### Comments on Local Plan 2018-2036 February 2018 Consultation

The report shows all comments made on the Local Plan 2018-2036 February 2018 Consultation and is ordered by the question.

| | |
|---|---|
| **Respondent Name** | Trefor Southwell |
| **Comment ID** | 16185185/2 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Further development of already overly populated areas without consideration for transport and parking issues is going to lead to problems.<br><br>As a resident of the development of Lyde Green is already having an adverse impact on traffic pollution in the area.<br><br>Pressure on local Schools is extreme and a new Secondary School has not yet been built.<br><br>Instead of more high density housing why can't we develop a new town within the County area, perhaps by re-purposing Green Belt? The new town needs to be linked directly to the Motorway by its own Dual Carriageway. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Chris Stow |
| **Comment ID** | 877825/7 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | This would appear to be a common sense approach to housing development and should have been used for previous large scale development. We are seeing, in Thornbury, and mainly due to the Local Authority putting its head in the sand with regard to new housing, a piecemeal approach to housing whereby there are around 1,500 houses planned and only 2 stores to service the incoming residents! |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kevin Wood |
| **Comment ID** | 19176641/11 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | To engage the community and take them on the journey the strong leadership needs to communicate more effectively. This is a voluminous Document which will put off most people. Add to this the complexity of accessing online (took 2 of us over half an hour to work it out). Finally the Council speak! Please simplify the Document, process and wording. Managing change is complex and this isn't helping.<br><br>2.26 makes sense. Protect, invest and joined up thinking with transport, facilities, services and infrastructure as part of the Plan from day 1, rather than an afterthought. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | James Fannon |
| **Comment ID** | 19203329/22 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | I have reviewed your Documentation for the Local Plan 2018 - 2036 and I feel that no consideration has been given to our Local Community in the following fields:<br><br>Roads and Highways - These are completely gridlocked and there is no plan to relieve or address this situation, or a plan on how to deal with this currently prior to more houses being built.<br><br>Our Hospitals - These are working at over capacity and patients are left in corridors to receive attention/treatment, and waiting lists are already unsatisfactory, without additional residents being added to this.<br><br>Doctors and Dentists - There are insufficient Dentists and Doctors in the local communities and are already unable to take on new patients in local areas forcing people to travel outside of their community to get registered on the books and receive treatment.<br><br>Our sewage works are working at over capacity and discharging untreated sewage, again no plans on how this is going to be addressed.<br><br>Schools - Are unable to take on all the children in their area, resulting in parents having to travel long distances and also parents finding their children are in two or so different Schools as unable to get a 2nd placement for their child in the same School due to being oversubscribed. |

| | |
|---|---|
| | Councils are unable to provide the services for their residents as it is, i.e. road maintenance, pot holes, waste management reduction in bin size encouraging now higher fly-tipping in the countryside, with additional houses this is only going to make the situation worse, and further breaking an already failing system.<br><br>I fully understand that the Council are instructed to provide more homes by the Government, however I think it is time that they stand up to the Government and refuse all Planning until all matters are addressed and sufficient services are able to be maintained and rectified.<br><br>In my views before we look ahead 20 years we need to look back at the previous 20 years to see what we have currently created and should be rectified.and to conclude I can only identify 3 words to rectify those matters, which are Infrastructure, Infrastructure, Infrastructure. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Gary Taylor |
| **Comment ID** | 19271809/25 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Dear Sirs,<br><br>I am writing with respect to the Planning Application associated with Site Reference SG32 – Land at Castle Farm Road, Hanham.<br><br>The proposal is to build numerous houses on farmland that has existed in the area for Centuries is a shame and ill advised for numerous reasons. For example: the land is currently the home of numerous forms of wildlife including: badgers, foxes, bats, woodpeckers, red deer muntjacs, slow worms, grass snakes, sparrow hawks, kestrels, owls, butterflies, hedgehogs and squirrels. All of which have visited at night or early morning. This land also provides an essential ecological buffer between the current housing developments and the woodland adjacent to the River Avon, allowing the wood's occupants to live, rest and travel safety and undisturbed. The land too is an ideal location for further occupation of endangered species such as skylarks, turtledoves.<br><br>The same land also provides a key wildlife highway into the centre of Bristol. Deer, bats, badgers, slow worms and especially bees and other insects travel along the Avon River to Conham and outer Bristol. The trees and hedgerows too provide a home to wildlife and maintain the historic farming nature of the area.<br><br>Hanham has a rich history including the famous Hanham Court and Hanham Mills and the Castle Farm area provides the continuation of the original Estate. The land is currently used for agricultural use, growing corn for use as a Biofuel. These fields are thus an ecological and Greenhouse positive unlike any other location under consideration. It is possible that tries to demonstrate on past production in an attempt to suggest a change of use is required. But given the high demand for Biofuels in the future, the financial outlook for this type of agriculture is good. The current productive agricultural use of this land make it the perfect barrier to urban spread and maintains this section of the Green Belt.<br><br>The footpaths crossing the area provide a wonderful opportunity for the local residents to enjoy the countryside without having to use their vehicles to travel long distances.<br><br>Development too would impact on the houses currently overlooking these fields and the noise and light pollution would impact on both the local residents and wildlife (Privacy will be lost as current houses would then be overlooked). The proposal for the development of the land says following an Ecological Survey, they intend to maintain green areas and footpaths to help local wildlife. I suggest the best way to protect the local wildlife would be to maintain their habitat as it is.<br><br>Since the construction of the Ring Road near to the Castle Farm area, the air quality of this once quiet area has deteriorated and the continuing development of housing and their associated vehicles will further exasperate this. Abbotts Road too is a narrow and congested road at peak times, with the single lane section outside the Elm Tree Pub and the cycle lane crossing especially dangerous. The additional traffic loads to the area would further increase the chance of accidents in the area.<br><br>With very limited work opportunities in the Hanham area, all new residents will need to travel for work opportunities resulting in high volumes of traffic in the area.<br><br>So in conclusion - I'm sure due to the fact the fields discussed have received numerous Planning Applications in recent years, and all have been turned down. You as responsible Planners will continue to see the sense in maintaining this part of Hanham in its original condition. With Hanham being the area with the richest and oldest history in the South Gloucestershire boundary, much of which was based around the Castle Farm Road location. Development of the fields associated with Castle Farm and the protective buffer they provide to the eco-rich Hencliffe woodland would be a sad mistake and detrimental to both Hanham and the Avon River area as a whole. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Stella Beecher |
| **Comment ID** | 19274081/26 |
| **Document Part Name** | Question 01 New Approach to Urban Living |

| | |
|---|---|
| **Comment** | Question 1:<br><br>My view of the S Glos Council Policy approach to the urban living element of the JSP in towns is that I do not think that this Policy will be successful in being sustainable. The stated aim of making these local centres "capable of supporting most of the urban living needs of the local residents" will not be achieved. An urban centre is more than a retail centre.<br><br>Relevant Policy:<br><br>NPPF 7 "*accessible local services that reflect the community's needs and support its health, social and cultural wellbeing"*<br><br>Current, and future, housing need will not be met by private sector homebuilders because the houses they build are too expensive for a huge percentage of the population. On 27th March 2018 the Rightmove website had 1,368 houses for sale in South Gloucestershire, the lowest price was £210,000 for a two bed semi in Yate. Rightmove also listed 464 houses for rent, the Lowest price was £795 per calendar month for a one bedroom flat, and £183 pw (fees apply). These houses would be sold, or let, immediately if desperate families could afford them.<br><br>-<br><br>The only solution is for Local Authorities to access alternative funding so that social/Council housing can be built on sites which are sustainable. A totally revised Local Plan is needed with radical changes to the housing proposals in it.<br><br>Relevant Policy:-<br><br>NPPF 47 *To boost significantly the supply of housing. Local Authorities should;*<br><br>*Use their Evidence Base to ensure that their Local Plan meets the full, objectively assessed needs for market and Affordable Housing in the housing market area.* |
| **Attached documents** | Question 1 Urban living .doc (26 KB) |

| | |
|---|---|
| **Respondent Name** | Robert Lomas - Iron Acton Parish Council |
| **Comment ID** | 15473953/32 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | The Plan Documents talk of "different Parking and Open Space Standards" without defining what new Standards are suggested. Are you proposing less parking provision or more?<br><br>Public Transport, walking and cycling provisions MUST be in place BEFORE homes are occupied. Once people find they cannot get about without a car they will never go back to non car use. Without viable convenient alternatives any attempt to restrict space for residential parking will lead to the congestion caused by on street parking. This has a negative effect on cycling further discouraging non car use. This problem is amply demonstrated by the existing roads in, for instance, Yate, when Estate roads have become linear car parks. Even main routes are so filled with parked cars that busses have difficulty passing through.<br><br>To be effective, cycle lane provision should, for safety, be segregated from the motor vehicle roads, Ideally cycleways should be separate from pedestrian walking paths. If you see anyone commuting by cycle they generally do not use shared paths due to the delays and conflicts with pedestrians, The Consultation Document says the intention is to encourage non car travel but fails to say in any detail how.<br><br>Currently our whole urban set up was designed to accommodate car use when a minority of people owned cars, now with mass car ownership those provisions are swamped. Even with the provision of local shops people still drive there to avoid carrying shopping home.<br><br>Nowhere in the Document is any attempt made to suggest how existing overcrowded roads and car parks etc are to be developed to accommodate the growth in population. An outpost of "new urban living" adjacent to an existing development will end up no different. Most households will own a minimum of 2 cars, minimum off street parking will mean more on street parking. That is unless a revolution in no private car use sweeps the whole region. Wishful thinking! |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anne Tyrer |
| **Comment ID** | 19338689/36 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Regeneration of our Town Centres would benefit everyone and hopefully lead to more local services and less centralisation of shops etc. It would be good to be able to walk to work and buy necessities without having to use the car. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kate Kelliher |
| **Comment ID** | 6031873/44 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | ‘Shift in future residents and workers expectations,’ ‘Will require strong leadership.’ Makes this Plan sound scarily dystopian.<br><br>However, words like ‘protection of our open countryside, Green Belt and valuable natural and historic resources sound good. Enhanced green infrastructure sounds like a full use of the symbols from Town Planning visualising software! We need some wild spaces too.<br><br>Plans to develop the existing towns and brighten them up, also sound excellent. As does renovation of existing work sites.<br><br>We know in South Glos that many Housing Estates are never finished by developers, especially the Affordable Housing elements. This must take priority over creating new housing areas, such as Coalpit Heath and Charfield.<br><br>I am extremely concerned about the degradation of the green environment between Coalpit Heath and Yate. Instead of Green Belt the Strategic Plan proposes a thin green area comprising an 84 acre gated Solar Farm with no access, a line of tall pylons and a railway line with only 1 way across at Broad Lane. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Margaret Pinder - Sustainable Thornbury |
| **Comment ID** | 19372321/55 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | We agree with the urban area proposals, particularly utilising Brownfield sites, increasing housing density, mixing housing/employment/retail/ community and providing a wider range of housing types in areas which already have good Public Transport. Enabling people to live, work and find shopping entertainment in their local area should reduce congestion and make local High Streets more viable. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mr. Hawthorn |
| **Comment ID** | 14671265/76 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | The intended Policy approach is contradictory. It speaks of a past approach of infill resulting in the loss of employment in certain areas and a need to encourage employment outside of Central Bristol yet the intended approach also involves infill and change of use from business to residential.<br><br>The proposal of reducing the need for travel is a pipe dream. In the East Fringe Urban Centres the travel options are finite. There are only a certain number of roads into Central Bristol yet Planners think it is appropriate to reduce these by creating One Way schemes (as proposed for Beaufort Road and discussed for Crews Hole Road). The result is to push more vehicles onto fewer roads and due to existing buildings there is no capability of creating new roads in these areas. To propose additional housing in these areas when the infrastructure is at breaking point already is ludicrous. The local Council and Planning Authorities seem to think that limiting parking in new developments will result in reduced car use/ownership. They only need to visit developments such as the Eco Village in Hanham and the development off of Carsons Road in Mangotsfield to see the eye-sore that these have become due to inadequate parking provision. In the latter in particular there are cars parked on every available piece of available space.<br><br>The focus should be on out of town development in areas that can be easily connected to existing infrastructure by train or tram with those facilities being so good that people prefer to use them over cars. Infill in existing urban areas should be limited unless/until major infrastructure improvements can be achieved. The gridlock at Hicks Gate during the week and around the Gallagher Retail Park (Aldermoor Way, Longwell Green) at weekends is atrocious and is only being made worse by ill-conceived Planning Decisions to allow additional development in urban areas.<br><br>The intended approach also speaks of poor air quality in certain areas. It is wholly unclear how any improvement will be achieved if there is further infill in urban areas or, worse, development on precious and rare Greenfield sites in urban areas that are vital for the health and wellbeing of residents in those areas and for flora and fauna. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Lisa Kopper - Friends of Acton Court |
| **Comment ID** | 10823233/81 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | I manage Acton Court which is a Grade One Listed Ancient Scheduled Monument, situated on the Latteridge Road near the Junction of the B4059 and the B4058. It is one of the most important Tudor buildings in the UK and as such attracts visitors from around the country and abroad. It has been filmed for many documentary series and its archaeological finds which are held at the Bristol Museum are said to be amongst the finest in Europe. |

| | |
|---|---|
| | The house and grounds are open to the public in the Summer and we host various other functions throughout the year. We have an active Association with The Hawk and Owl Trust. We are a Soil Association certified organic site.<br><br>Many of our visitors have expressed concern about the safety of Acton Court due to the large numbers of HGVs that currently use the Latteridge Road.<br><br>I was therefore dismayed to learn that South Gloucestershire's Planning Department intends to allow thousands of new build homes on Green Belt land both in Thornbury and 'North Yate,' including Iron Acton. As things stand, the Latteridge is the only Link Road between these two areas.<br><br>I attended one of the drop in centre exhibitions and asked one of the Planning Officers about the absence of infrastructure to support these new homes, I was told that 'Planning' doesn't work as I thought and Planners decide where they want to put the houses first. In my view, this statement indicates a shocking lack of awareness regarding the nature of good Planning. It is not tenable to add thousands of vehicles onto already overloaded roads like the Latteridge. There needs to be a viable solution for transport infrastructure issues included in the Plan.<br><br>I understand that one of the Policy principles is to 'ensure the protection and enhancement of the natural, built and historic environment.' Acton Court is a nationally important example of the historic environment that should be considered regarding new Plans. We already suffer from the effects of excess vehicle and HGV use on our narrow road which is clearly inappropriate for the weight of traffic it carries.<br><br>Recently some of our ancient stonework has begun to blacken due to acidic environmental pollution. Vibration has a negative effect on the dry stone building structure. The relentless noise from the traffic does little to enhance our historic environment and neither does the encroachment of industrial areas in close proximity to our site. I fear that the addition of more traffic will make our situation untenable; ever more dangerous for our visiting public, our wildlife which includes protected species and the integrity of the Monument and standing building.<br><br>The Local Plan recognises that the transport infrastructure in this area is not adequate but does not suggest any remedies. We call on the Council to properly evaluate transport infrastructure as an integral part of The Local Plan.<br><br>Lisa Kopper<br><br>FOAC/Acton Court |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Jodie Bailey - Pucklechurch Parish Council |
| **Comment ID** | 1061057/88 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Parish Council is concerned that a change that promotes house building where employment opportunities are reduced as a direct result, promotes unsustainable communities and will contribute to increased commuter traffic. Reduction in the levels of land restricted to employment is contradictory to the drive by the Authority to attract businesses to the area and risks South Glos becoming a series of Dormitory Towns (See SGC Briefing Note Economic Development Update March 2018). |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mayers |
| **Comment ID** | 16271713/89 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Bristol City Centre should be built up and the space used more creatively instead of constantly building on Green Belt and destroying nature and wildlife. The Government say they want o improve the environment and help nature, the only way to do this is to build on Brownfield and and build upwards in the cities and not outward. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Claire Normoyle |
| **Comment ID** | 7883105/105 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | It all sounds good, but the Council is already giving Planning Permission to developers when there is no agreed infrastructure in place to accommodate the new housing and there is no more employment in the area. Surely housing should be where it is needed near the employment sites? Maybe the Council should be looking at employers not housing.<br><br>I was under the impression that the JSP had yet to be agreed in public before there is any need to keep giving Planning Approval especially in Thornbury where we now have more building and houses than we can cope with. |

| | |
|---|---|
| | We now need to know when a Planning Application is Approved we should or the Council should insist on a start and finish date for the building so we all know where we stand. Otherwise Planning is Approved but may not happen for 5 years. The Council is not spending anytime looking at the infrastructure to cope with the problems like Health, Transport, air pollution to name but a few. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Payne |
| **Comment ID** | 19414017/106 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Yet again this Consultation has just considered mostly housing. This Consultation does not consider the building of new Schools, Hospitals or GP clinics or for the improvement of road structure. This Consultation alongside other Consultations in the area are not structured to work together.<br><br>The "DOWNEND, HENFIELD & WINTERBOURNE AREA Experimental Traffic Order 2018" Consultation is talking about decreasing the infrastructure of the local roads and increase traffic on the major road links. And the current Consultation "South Gloucestershire New Local Plan: Consultation Document (February 2018)" furthers to increase traffic as well. A proper Traffic Survery needs to be completed within rush hour to make a proper analysis to how long current journeys take. I travel in from and it takes me 45 - 1 hour to get to , where I work. This takes around 20 minutes in normal conditions. The new housing proposed will add at least 2,000 more cars on the road in the local area. How will the infrastructure be improved to accomdate them?<br><br>There are no rules around the building of these houses. Currently there is a high percentage of the population who own cars therefore. these houses need to be accommodated with a parking space for each bedroom in the house. Therefore, if there are 3 bedrooms then the house should be able to store 3 cars are the house without using road space otherwise parking will become an issue like it is for all new Housing Estates. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Claire Normoyle |
| **Comment ID** | 7883105/107 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | I would like to know what is this shift that we need to make, other than people should be living closer to where they work which is not the case in Thornbury so the Council is encouraging the opposition of what this Plan says. I am confused. I feel we are being led down a blind alley.<br><br>At the moment it would appear that the Council is trying to build more houses than is needed, by 35% why would this be happening? Where is the employment in Thornbury that requires all the development? So if we have no employment then we are going to increase the traffic problems and air problems and the Town Centre will not grow as most residents will be driving out of the town, I thought this is not what we want. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tamzen Bury |
| **Comment ID** | 19416385/114 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | I understand there is a lot of green space available in Hanham to build on, however Hanham was built as a village and is not set up for the increase in population proposed. I have the following concerns with the new approach to urban living, that will cause problems with traffic congestion in our areas with narrow roads, longer commutes to Bristol or Bath, a loss of our green spaces, reduction in house value, a loss of village feel, a loss of cricket ground in walking distance, and a requirement for more car parks in Hanham, more Doctors and more School places. Specifics are below:<br><br>TRAFFIC CONGESTION - The village of Hanham does not have the road structure to cope with an increase in population which would bring with it a large increase in numbers commuting to work. I live minutes from off and my commute to Harbourside in Bristol already takes me 1 hour if I get the number bus from , or it takes me 50 minutes if I drive into town and park in the @Bristol car park, but that costs around £14 a day to park. Sometimes I park for free around Barton Hill and walk in, or I get the Brislington Park and Ride, but again these options all take me 50 minutes. In the other direction, where traffic heads towards Bath using Abbots Road then Court Farm Road heading out to Bitton, the road is narrow and traffic has to take turns to pass along by the Elm Tree and at the sharp corner before reaching the top of Ellacombe Road. It would be ridiculous to build the number of houses proposed in Hanham without addressing the traffic problem. Either a Park and Ride, or a big increase in the frequency of the 44 bus would help, but there would still be a massive increase in traffic in Hanham.<br><br>CAR PARKING AVAILABLE BY HANHAM HIGH STREET - Hanham only has one car park near the High Street opposite the Co-Op and Lloyd's Bank. I often have to queue to get into the car park, as it is not big enough to deal with the number of people that want to use the High Street shops/cafes. A couple of cafes have closed down recently, which is possibly because people have nowhere to park since the Hanham Folk Centre community car park became private. I think the Kleeneze site should have been turned into a car park.<br><br>CAR PARKING BY HANHAM COMMON - The car park by Hanham Common is now used by the residents of the development on John Chiddy Close, and it's rare I can park there to use the Common Co-Op or butchers at the bottom of Whittucks Road. |

| | |
|---|---|
| | REDUCTION OF GREEN SPACE - The green space is one of Hanham's key attractions and people have paid a premium to live in a village surrounded by green space, that you now want to greatly reduce. Therefore it's very likely the value of people's houses will go down if the green spaces are built on.<br><br>CRICKET CLUB - This and the Social Club by the cricket group are popular, as they are fairly central to Hanham and people are able to walk there. The proposal wants to move this outside of Hanham. It's not on to reduce the sports facilities in Hanham, and move them to the outskirts. Not everyone wants to get in the car or walk too far. As there's currently no path to the area with the proposed sports ground, a new walkway would need to be built which I believe is mentioned, however, this would need to be well lit, as it could be risky for teenagers walking there if it's dimly lit and quiet.<br><br>SCHOOLS AND DOCTORS - The Doctors, Dentist and Schools in Hanham are already full with waiting lists. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anne Gale |
| **Comment ID** | 16344321/118 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Looking at the Maps for this Plan, I really wonder if your Department are aware we are required to get more exercise. Walking is wonderful exercise. We are also required to care for the environment and protect wildlife, Biodiversity, the planet.<br><br>And yet, South Glos wish to cover it in concrete, don't care for the environment but, seemingly, are more concerned with by to Developers. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anne Gale |
| **Comment ID** | 16344321/119 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | You build these big developments, such as Lyde Green, and Do Not provide GP Surgeries, shops, Pharmacies or amenities for residents. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Paula Hudson |
| **Comment ID** | 19424737/137 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | On reading the Plans for Urban Living I agree that we need to look at existing sites that have not been used for some time. In Hanham the old Kleeneze site has been left undeveloped for several years and is an eye sore for the people of Hanham. This site is crying out for housing development and I believe at the moment there may be a Planning Application put in next year. The site is huge and right next to the High Street for transport links and shops, restaurants, cafes etc and would therefore be more suitable for housing development as the infrastructure is already there. However, I believe that the Council needs to offer some incentives to prospective builders to help develop sites like this instead of them looking to develop residential sites on the open Green Belt areas of Hanham. I know the cost of clearing a site like the Kleeneze one would be high in comparison to clearing a field but we do not want to lose our Green Belt areas around Hanham.<br><br>The possibility of having houses built on the Cricket Club in Hanham, which has been there for as long as I can remember is very sad. The idea put forward at the moment is to re-locate the Cricket Club further along Abbots Road opposite the duck pond and then build more housing around it, this is absolutely stupid. This section of Abbots Road is very narrow with no pavements and reduces to single lane at each end by the Elm Tree Pub and Sally on the Barn.This would make it extremely unsafe for pedestrians in particular children walking to School plus impossible for Public Transport. The local Schools and Doctor's Surgery can not cope with more residents if houses were built here as well as the Kleeneze site, they are struggling as it is.<br><br>This is Green Belt land and if any development was permitted here it would open the door to further development across Hanham Hills, which have been used by the public to walk dogs and simply walk for years. I remember walking there and using in the snow and still use it for this today!!<br><br>Therefore make use of existing sites and possible Brownfield sites before taking away our Green Belt. I feel that the Keeneze site is in the ideal position for housing and would be Hanham's contribution to the Urban living Plan. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Martin Gillian |
| **Comment ID** | 19445537/145 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Generally support the direction of this Consultation Document, with caveats around village development. |

| | |
|---|---|
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Oliver Simmonds |
| **Comment ID** | 19446017/151 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | I endorse the new approach to Urban Living in principle, however would suggest that any increase in the density of development needs to be matched by an increase in the quality of the built environment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kit Stokes - Stokes Morgan Planning Ltd |
| **Comment ID** | 19451073/155 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | If the Council is to achieve this goal (which we support) the LPA will need to adopt a more pragmatic view on height (relative to the prevailing height) and to adopt a more pragmatic approach to Car Parking Standards. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Thompson |
| **Comment ID** | 17795873/160 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | I agree with the new approach to Urban Living for the areas identified in the Consultation Document. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Richard Hunter |
| **Comment ID** | 19451841/176 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Plan for the future. By 2036, I expect driverless cars to be standard. Together with better public transportation with flexible real-time routing in response to passenger demand, you should be looking to ban urban travel by private car and eliminate many car parks, freeing up lots of land. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christopher Tippetts |
| **Comment ID** | 19452065/177 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | I cycle every day on the roads around Thornbury. The reality is the A and B Roads are riddled with potholes making each journey a risky, uncomfortable experience.SGC may say they want to encourage cycling but I would say potential cyclists are often totally put off by the dreadful dangerous state of the roads . The new developments at Thornbury Fields and Park Farm have not generated lots of new cyclists evidenced by new bicycles appearing outside Aldi or Tesco. The infrastructure has to be improved first before any new developments are sanctioned. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David Eggleden |
| **Comment ID** | 19452161/182 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Objection to Plan Consultation Document for Willsbridge Site 2. |
| **Attached documents** | Objections Letter.pdf (57 KB) |

| | |
|---|---|
| **Respondent Name** | Christopher Tippetts |
| **Comment ID** | 19452065/197 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Why has SGC set a 35% excess build figure for housing for Thornbury for 24,000 houses? Why is there no requirement to have Infrastructure in place before the developments are built for Thornbury yet there are Infrastructure rquirements for other key areas in South Gloucestershire? |

| | |
|---|---|
| | Buckover Garden Village is definitely in the wrong location to be a sustainable development. It straddles the extremely busy A38 AND IT IS FAR TOO CLOSE TO THE BOUNDARY OF THORNBURY to have it as a separate development. It will negatively effect the Thornbury infrastructure which is struggling to cope with the extra housing developments in the North West of the town. Falfield and Charfield will also have extra developments so all of these will effect the traffic overload at the M5 Junction 14 which has one bridge to cope with all the extra traffic.<br><br>In addition the Buckover Garden Village will have a negative effect on the offset Tytherington/Thornbury Grovesend Traffic Light controlled Junction with the A38. Also the A38 is designated as a **Relief Road** for the M5 at times when the M5 is blocked or during peak traffic flows. For all the above reasons Buckover Garden Village is in the wrong location. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Carolyn Baker |
| **Comment ID** | 17252193/203 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | It is imperative that any changes to the Local Plan maximise the use of existing urban areas and Brownfield sites. I would support the improvement of existing urban areas.<br><br>Green Belt land must be preserved at all costs, thereby reducing:<br><br>The need of additional roads and increased car use;<br><br>Deterioration of air and other environmentally important qualities. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tamzen Bury |
| **Comment ID** | 19416385/207 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | I don't believe places such as Hanham that were built as a village should be considered to build additional houses, as there is already congestion in areas such as Memorial Road near the Hanham Woods entrance, which is narrow when people have cars parked on both sides of the roads, and also past the Elm Tree on Abbots Road where there is only space for one car to pass at a time as the road is narrow. The building of houses has been proposed on the field on the back of Hencliffe Way, however residents in that road often have cars, work vans or Motorhomes parked either side of the road, meaning the road set up is not suitable to route an additional c.300+ cars through a day (based on the assumption there will be an average of 2 people with cars living in each of the new houses proposed). Also there is not sufficient parking near the High Street for an increase in population to gain access to the shops, restaurants and cafes there. I think brand new sites that are purpose built with their own shops and eateries, with easy access to a large main road or Bypass makes far more sense, such as the Lyde Green area. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Peter D. Box |
| **Comment ID** | 19453441/218 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Like all local Councils within the UK, SG has an obligation to meet specified reductions in CO2 emissions (Green-House Gases - GHG). At present the target reductions are framed in EU regulations but will almost certainly be transferred to UK regulations post Brexit.<br><br>http://ec.europa.eu/environment/air/quality/standards.htm<br><br>Any and all increases in commuting within the County will all but guarantee that these targets will not be met. It should be borne in mind that housing schemes have been rejected on the grounds of predicted increases in air pollution.<br><br>https://www.airqualitynews.com/2015/07/03/plan-for-97-sussex-homes-rejected-on-air-quality-grounds/<br><br>https://www.airqualitynews.com/2017/11/14/planning-decision-upheld-after-air-quality-ruling/<br><br>Pollution is not confined to the atmosphere: soil and water courses are also polluted within metres of even minor roads. Nitrogen Dioxide (NO2), common in diesel exhaust, is particularly toxic as with water, it produces Nitric Acid. Other relevant forms of pollution include noise and the detritus which seems to accumulate in roadside verges and hedgerows: various forms of plastic are of particular concern because of their durability.<br><br>An effective way of controlling pollution is therefore to reduce commuting by locating housing developments as close as possible to places of employment. |

| | |
|---|---|
| | Developments of the sites proposed for Thornbury, Charfield and Buckover, require a significant amount of infrastructure to provide residents with the services that they would expect. These cover a very wide range of facilities: Medical, Police, Fire and Ambulance, Schools and Libraries, water and sewage treatments and systems, recycling and waste disposal, shops and supply and probably many more.<br><br>All these would not only require a considerable financial resource to set up, particularly at Buckover which is virtually a Greenfield site, but would all add considerably to increased traffic on the Road Network with resulting negative impact on congestion and pollution.<br><br>Throughout the JSP continual reference is made to the MetroBus as a solution to transport problems. Some of the references are deliberately vague as, like Thornbury and Buckover, no plans currently exist for routes to service those sites. Even if the vaguely promised MetroBus routes were implemented, could they provide the transport capacity required?<br><br>Consider Buckover, the JSP proposes a new Dormitory oTwn of 3,000 dwellings. This means a population of 10 - 12,000 people of which some 6,000 would initially be adults. Of these at least 5,000 would be in need of employment. Currently there are virtually no jobs at Buckover (one Public House and a medium sized garden centre) and as the nearest towns of Thornbury and Charfield are also scheduled to receive additional housing of 500 and 1,200 units respectively, there is little prospect of all the New Wave Buckoverians finding jobs locally.<br><br>Bristol, over 10 miles away, will be the obvious job centre attraction for say 40%, i.e. 2,000 jobs.<br><br>MetroBus vehicles will have a passenger capacity no more than a standard double-decker bus, i.e. less than 70. To carry the Buckoverians to work in Bristol will therefore require a fleet of about 30 vehicles, and this will be increased by existing Thornbury commuters (to reduce existing car use) and further to meet the needs of new residents.<br><br>That a fleet of around 50 vehicles (plus drivers) would be needed to cope with the demands of this one route alone, illustrates an important conclusion:<br><br>**MetroBus is NOT a mass transport system.**<br><br>Commuters will therefore resort to the use of private cars, and even encouraging car-sharing, the result will be severely increased road congestion and consequent air, soil and water pollution through the Green Belt which the Council is obliged to protect. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Gillian Sanders - Wessex Water |
| **Comment ID** | 19455361/228 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Overall, we support the proposed approach to urban living. We would note the following:<br><br>• Whilst intensification of development on existing urban or Brownfield sites is supported, we would note that this could give rise to capacity issues in sewerage networks and that requirements for improvement/upgrades to infrastructure will be required to support the new approach. Development on Brownfield sites can have the benefit of existing or recent connections to sewerage and water supply services. We will seek opportunities to reduce surface water flow from Brownfield sites by the use of Sustainable Drainage Systems (SuDS) and ask that the LPA supports securing green space within sites to accommodate SuDS whilst contributing to placemaking, wellbeing and water quality. Existing sewers at the edge of towns can be of small diameter, increasing in size towards the receiving Water Recycling Centres (WRC - sewage treatment works). Development of sites around the edge of existing settlements may require increasing capacity in our sewers which can be disruptive and costly depending upon the distance from the WRC and nature of the existing network.<br>• We welcome the acknowledgement that investing in the recreational and Biodiversity value of green space and water is important for people's wellbeing and Climate Change impacts. As the new approach developments, we would welcome further discussion on how these aspects could be set out in Policy and used to develop multifunctional open space solutions, which also address Sustainable Drainage Systems, flood storage and water quality improvements alongside Biodiversity and Climate Change adaptation and mitigation.<br>• We welcome and support the Place Shaping principles outlined in Policy 5 of the West of England Joint Spatial Plan. However, the desired outcome from the high-level Policy statements require support by linked detailed Planning Policies in the South Gloucestershire Local Plan and Supplementary Planning Documents (SPDs). We would welcome an opportunity to input into Consultation on detailed Policy Statements to help deliver the aspirations as set out in this Consultation Document.<br>• A design-led approach would ensure that minimum standards are met in terms of providing good accessibility to high quality local facilities including different types of green spaces, which are not oversubscribed and multifunctional green infrastructure alongside the new standards for high density. If these quality standards (or other minimum proposed standards) are not mandatory, it is unlikely that these will be delivered through major residential schemes. There is also a potential risk that new density standards could come into conflict with other Policy aspirations such as the provision of green space and multifunctional green infrastructure (including SuDS). This could be addressed through a needs assessment for an area beyond the redline boundary of proposed developments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Leslie Forrest - Campaign to Protect Rural England South Gloucestershire Dist... |
| **Comment ID** | 16478497/240 |
| **Document Part Name** | Question 01 New Approach to Urban Living |

| | |
|---|---|
| **Comment** | CPRE welcomes the vision of urban living and that S. Glos recognises that it will fail unless there is strong political leadership. Enhancing the urban areas is the most sustainable of the three means of delivering new housing. High density has been achieved in the past and today provides some of the more desirable dwellings, amongst which are the Edwardian Terraces built for artisans. Replicate those standards of floor space and room sizes and the shift in expectations will soon be achieved. Assembly of sites will be the critical issue and will certainly require public investment, leaving it to the market will not be sufficient. The text makes much use of the need to find suitable locations, exploring and encouraging but translating this into reality is likely to prove ambitious. The target of 2,900 houses could require the redevelopment of over 200 hectares within the six centres, is this achievable? Parking as an issue is identified but not Minimum Dwelling Standards; in the UK we are building the smallest houses in Europe and it is within S. Glos's power to set minimum standards and this needs to be laid out in the Policies, something that is currently absent. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ann O'Driscoll - North Bristol SusCom Ltd |
| **Comment ID** | 5846881/246 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | There is a need to undertake some detailed work to look at transport connectivity between the urban living areas and key employment locations. Orbital connectivity across the North and East Fringes relies heavily on the Ring Road at the moment and as growth continues this will become more and more constrained and we need to be addressing current public and active transport deficits to enable people to travel by more non-car modes - thereby freeing up constrained roadspace to allow a better flow for Public Transport and enabling a more healthy and active population. Whilst there are proposals for an orbital MetroBus in the Joint Transport Study there will need to be a review of the current bus network and a clear plan of additional improvements to Public Transport, cycling and walking corridors. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tom Barnes |
| **Comment ID** | 19456513/247 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | I strongly condemn this process as ineffective and inadequate, specifically:<br><br>- South Gloucestershire Council is failing in its duty to take the Draft Joint Spatial Plan (JSP) for the West of England and convert this into a Local Authority based Plan to show how, where and when this housing will be delivered, and more importantly what infrastructure will need to be in place in order to deliver it. This is a lightweight Document that performs none of these functions.<br><br>- This Document is in any case premature, in that the JSP has yet to undergo its Examination in Public, and we cannot yet know what will be included.<br><br>- South Gloucestershire's housing build target gives an astonishing margin of a 35% excess build over forecast need.<br><br>- South Gloucestershire has failed to explain why it has volunteered to take so many more houses than the forecast demand suggests. This is anti-democratic.<br><br>- This proposed Plan does not address failure of infrastructure to keep pace with development etc, rather it exacerbates the problems.<br><br>- South Gloucestershire has a commitment to achieve specified reductions in the level of CO2 emissions which this Spatial Policy will all but guarantee to cause the Authority to miss. This is a wilful neglect of duty which may also be illegal.<br><br>- South Gloucestershire has a statutory duty to explain what transport and infrastructure it proposes and how this will be funded, which it is clearly failing to do, and to guarantee that these developments will only be allowed if the infrastructure is built first.<br><br>This process should be stopped immediately and a full local Consultation should be carried out before such a Plan is drawn up. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Helen Johnstone - Stroud District Council |
| **Comment ID** | 14317537/248 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | 1. Support the general principle of making the best use of land in the four identified urban areas, including Yate, through higher density development, building above shops and offices and providing for a greater mix of uses in town centres alongside increasing housing choice and protecting historic assets.<br>2. Support the general principle of providing for the change of use of safeguarded employment land to mixed use or residential use where it can be demonstrated it would be a more effective use of land in accordance with proposed changes to the National Planning Policy Framework (NPPF). |

| | |
|---|---|
| | 3. Consider that Para 2.23 should promote **positive** changes to public realm, green spaces, community services and facilities, parking and sustainable forms of transport to cater for increased demand.<br>4. The identified Policy approach should also include identifying linkages within the wider area, including in neighbouring local authority areas, to maximise opportunities for transport and community infrastructure improvements and sustainable development.<br>5. The intended Policy approach should include identifying opportunities to create a Green Infrastructure (GI) Network throughout urban areas linking key community services and facilities, walking and cycling routes and maximising multi-purpose use.<br>6. Suggest that the intended Policy approach should be amended to refer to providing for flexibility in the provision of parking and open space (public and private) in different parts of the urban area. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | D. Dawkins |
| **Comment ID** | 19457889/268 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Why have all other Local Authorities in the West made it a requirement of a development to improve the local infrastructure before the development takes place - South Gloucestershire Council is alone in allowing development without the required infrastructure being in place.<br><br>The A38 is already full at peak times yet the plan is to have 3,000 more houses built on the edge of Thornbury!<br><br>Planners have suggested the MetroBus could be extended to Thornbury but offer no evidence that this will mitigate the 3,000 extra users of the A38 nor offer any plans as to how any dedicated bus lanes could be built. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Louise Seaman - Mactaggart & Mickel |
| **Comment ID** | 19457953/270 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | M&M have no objection to the principle of additional development within the urban area. Indeed the reuse of previously developed land is a core principle in the NPPF and the emerging Draft NPPF indicates a direction of travel to increase the density of such sites. However, such development is not without its problems in terms of issues of contamination, fragmented land ownership and site accessibility as well as viability issues. It is considered that the level of development for such sites may not be achieved. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Emma Jarvis |
| **Comment ID** | 2745345/277 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | The proposals for the urban areas should incorporate joined up Transport Interchanges and have plenty of parking for daily visitors from rural areas needing to use key facilities based there. Many rural areas do not have access to bus services. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Hicks - Falfield Action Group |
| **Comment ID** | 16618369/298 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | We support maximising development of Brownfield land in existing urban areas to minimise building required on Greenfield sites and to make the best use of existing transport opportunities and provide better opportunities for urban living.<br><br>This approach will however, only be effective if there are incentives for developers to invest in developing Brownfield sites as without which, the increased costs of developing these sites could lead to increased house prices and a key objective is to provide Affordable Housing.<br><br>There also needs to be a sound formula for not just identifying the community services and facilities required to support development, especially where some sites could see a total change from employment to housing. Without controls to ensure the services and facilities are delivered, there is likelihood of creating unsustainable developments, which increase use of the private motor car.<br><br>We are somewhat concerned over the Comment referencing different Parking and Open Space (public and private) Standards for parts of our urban areas. Although there is a drive to reduce travel, it will not be eradicated. Residents still need somewhere to park their cars and residential parking should not be reduced. South Gloucestershire is not Central London nor does it have a Public Transport system that supports residents making a decision not to own a car. The MetroBus delivers only a small proportion of the improvements needed to Public Transport that is needed. Encouraging people from outside a local area to make use of services and facilities supports local businesses and increases local revenue. There needs to be effective joined-up Public Transport and cost-effective visitor parking. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Louise Fowler |
| **Comment ID** | 19466561/301 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | **I agree with the approach to urban living; we do need to ensure that our spaces are well used and are good for people to live in. My concern is that the Council will concentrate on the 'in-filling' of housing/and other business type developments, and 'run out of money' to support urban life to be good - i.e. improve congestion, support infrastructure such as services to health, transport links etc. It is a whole system approach that is needed - which is described, however it must be delivered as such. We need confidence as residents that this will happen.**<br><br>**Coalpit Heath & Frampton Cotterell need a 'heart;' the few shops that there are, are spread out and lack a feeling of a 'centre' and needs more of a feeling or sense of 'community.' If this could be achieved in the new Planning developments, I will certainly be happy with that.**<br><br>**As ever, Affordable Housing for young people is needed, but keeping a sense of pride in our environment is key - reducing young teenagers to 'hang out' in parks/public spaces where they make a nuisance. over looks such a space and has had a big problem in the past with young people - this has reduced considerably over the years, with good community policing.**<br><br>**I live in - on the borders of and the Plan describes that there are new developments proposed for - but I'm not clear about exactly WHERE these proposals will be developed. Transport into Bristol, along the A4174 has been increasingly difficult over the years I've lived here - almost constant road works on the Ring Road for one reason or another. However, the bus lanes are really starting to work - I travel by bus into town almost on a daily basis and it is much quicker than a car. The other mode of transport is by bike from , to reach the cycle path at Henfield (going towards Pucklechurch) - this is a country road, and this link could be improved for cyclists to encourage people to use the cycle path. The approach from the bottom of Down Road onto Badminton Road needs improvement - traffic lights or mini roundabout as there are often incidents along there.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sarah Blackmore |
| **Comment ID** | 16193889/305 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Agree with the approach identified. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Claire Young |
| **Comment ID** | 916289/332 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | I welcome the commitment to making better use of Brownfield land in urban areas and encouraging more mixed use in Town Centres. With retail sales increasingly moving online, it's important to have a mixture of uses in the Town Centres to keep them vibrant.<br><br>I also welcome the commitment to flats and smaller homes. These are needed due to the changing demographics, with more people living alone and some older people wanting to downsize. Large house builders have focused on building family homes.<br><br>Improvements to Public Transport need to focus on reliability, frequency and cost – people need to be able to walk up to a bus stop and know there will be a bus along soon and that they can afford to ride on it. It is not just about linking Town Centres, thought needs to be given to how people move around within communities. We need express services between major centres with shuttle bus services feeding into them.<br><br>The Document doesn't explain what is meant by “Different Parking and Open Space (public and private) Standards for parts of our urban areas.” The Document correctly identifies as a challenge problems relating to on street parking. Does “different” mean that more parking will be available off-street to avoid this or are you still hoping that limiting parking will reduce car ownership? High car ownership is likely to continue in the Market Towns and if you want to encourage people out of their cars for some of their journeys, they still need to be able to park them at home. Similarly, what is envisaged for the different Open Space Standards? If you have more flats and small homes with limited private amenity space, you need better public open space. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David White |
| **Comment ID** | 5522945/348 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | All aims seem reasonable but more emphasis on transport infrastructure. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Caroline Brewser |
| **Comment ID** | 10284257/349 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Considered development of the urban centres is a good idea, but please recognise that people from nearby villages and rural communities should then be encouraged to travel to these urban centres to support them and help them thrive. If car parking and road transport are to be reduced, then regular, affordable Public Transport that travels directly to these centres from a wide range of locations is required, or else usable Park and Ride schemes. As of , I travel by car rather than bus not because I particularly want to use a car but because the bus service is infrequent, slow and does not take me to the places in South Gloucestershire that I want to reach at the time I need to travel. Public Transport is also expensive, even for people who are not on Benefits (just because someone does not qualify for Benefits doesn't mean they are wealthy or have money to waste). So please do not build on car parks unless there is a viable transport alternative, or people from outside the urban areas won't spend money in the urban areas but will instead spend it online or in places they can reach easily. Consider investing in Pilning Station so that it acts as an alternative to road transport to take people from to employment and education in the area around Patchway and Filton Abbey Wood (People cannot reach these areas of South Gloucestershire by train from Severn Beach). Use of this Station would also ease road transport to major centres such as Bristol, Newport, Cardiff. Improve cycle paths everywhere (not just where it's convenient to do so) and provide secure, supervised cycle parking in the urban areas. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tristan Clark |
| **Comment ID** | 19194177/355 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | This Policy approach aspires to build ‘a greater variety of homes [...] to complement existing stock’ (2.23). This, however, will not mitigate the current housing crisis because it contains no mechanism to counteract the prevalence of buy-to-let landlords. Increasing the number of affordable homes being built will enable some residents to rent property and some first time buyers to enter the Housing Market but this is insufficient to address the housing crisis. Diversifying the types of new housing on the market will have negligible effect if all this achieves is to diversify the types of housing owned by private landlords.<br><br>It also aspires to reduce ‘the need for travel which in turn can reduce congestion on transport routes’ (2.24). Whilst this is theoretically possible it is extremely unlikely because, with a significant increase in the population of South Gloucestershire in the next 18 years, the net number of weekly car journeys is almost certainly going to substantially increase. To reduce congestion below present levels the Local Authority will need to supply jobs and services to users on their doorsteps and to vastly increase the number of residents using Public Transport. South Gloucestershire Council simply does not have enough money to deliver these. Including aspirations that will inevitably fail to be delivered is pointless PR spin. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Jill White |
| **Comment ID** | 10710785/360 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | I do not understand what you are asking me to Comment on. This is almost impossible to understand. It has already taken me 1 hour to read this. Please CAN YOU MAKE YOUR QUESTIONS UNDERSTANDABLE!! |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christina Biggs - Friends of Suburban Bristol Railways |
| **Comment ID** | 19467329/374 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | FOSBR campaigns for local rail improvements. As such we do not have a Policy on what urban living projects to support, but we can comment that any urban project needs to have effective Public Transport links. We think that any sizeable urban settlement must have a rail link as well as any proposed bus links, whether MetroBus, GBBN or standard bus.<br><br>As such we have grave concerns around the proposals for Buckover Village and Coalpit Heath, unless rail projects such as restoring passenger services to Pilning, extending the freight line to Thornbury and reopening Coalpit Heath Station with a passing loop, are committed to and delivered before any Planning commitment is made.<br><br>We have the support of SevernNet, Pilning and Severn Beach Parish Council and the Pilning Station Group on this, as well as Matthew Riddle and Tim Bowles of WECA. Jack Lopresti MP is also supportive of Pilning Station.<br><br>Furthermore, the Cribbs Mall extension scheme proposer has committed to support a minibus service from Pilning to Cribbs Mall should passenger services be restored to Pilning Station.<br><br>SevernNet have also indicated that they would support a bus service serving Western Approach from Pilning Station.<br><br>There is also the fact that Pilning Station will be near to the new M49 Junction. |

| | |
|---|---|
| | Finally, Pilning is 21 minutes by train from Temple Meads and could be served by the hourly Cardiff to Taunton service and occasional trains on the Cardiff to Portsmouth service.<br><br>The service to Severn Beach is far inferior - even although timetabled for 80 minute frequency, these trains have had very poor reliability since July 2017, and with the new signalling BASRE project show no signs of improvement. A "belt and braces" approach must be taken.<br><br>As Pilning is operational, services could be resumed as early as the new timetable in December 2018, with a trial service in the run up.<br><br>The only infrastructure need is a footbridge - there is a temporary footbridge at Patchway and certain other stations across the UK. A fully compliant disabled access bridge would be a mere £2m. All that is needed is to request from GWR and DfT a timetable modelling with Railsys which WECA at present have access to. |
| **Attached documents** | Employment density for local Pilning area.pdf (40 KB)<br>FOSBR Pilning CBA February 2018.pdf (430 KB)<br>M49 jn and cycle path to Pilning.png (1.7 MB)<br>Gibbs Mall response to Biggs re Pilning 25Sept2017.doc (33 KB) |

| | |
|---|---|
| **Respondent Name** | Susan Simmons - Westerleigh Parish Council |
| **Comment ID** | 17221409/398 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | **1. New Approach to Urban Living: What are your views on our intended Policy approach?**<br><br>**WPC agree with the intended Policy approach, and of particular interest to WPC is Yate.**<br><br>**The following aspects would be important:**<br><br>**Provide smaller housing units for purchase or rental, in private and social housing ownership.**<br><br>**Create much more employment in the proximity of the new homes to limit travel away from area & associated congestion.**<br><br>**Improve parking.**<br><br>**Improve Public Transport** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kevin Wilkinson - Avon and Somerset Police |
| **Comment ID** | 1052481/419 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | The contents of Section 2.26 are noted as is the Supporting Documents compiled on behalf of the Authority by Nash Partnership. This Nash Partnership Document whilst including various demographic data fails to take into account any crime data for the areas and therefore fails to consider any crime and disorder implications for the approach.<br><br>This has subsequently led to the above Section in the Local Plan Consultation Document NOT taking into account crime and disorder as required by all the Planning legislation referred to in the Introduction.<br><br>Issues to consider are:<br><br>o The areas selected are the highest crime areas in South Gloucestershire, which means any developments, are at the highest risk of crime.<br><br>o Designing out crime is more problematical where the development has to be integrated into an existing area.<br><br>o The developments even well designed would also have to ensure that they do not place existing properties at an increased risk of crime. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alveston, Rudgeway, and Earthcott Parish Council |
| **Comment ID** | 19784545/428 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | **Supportive of this approach. NB With uncertainties of Brexit on the economy this must be factored into the proposal.** |

| | |
|---|---|
| | **A strong emphasis should be given to the infrastructure to support these Communities.**<br><br>**Rather than build more houses what can be done to utilise empty rooms? I.e. ensuring a good ratio of occupancy.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Donna Ford - Iron Acton Parish Council |
| **Comment ID** | 1060385/460 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | **New Approach to Urban Living:**<br><br>Iron Acton Parish Council welcomes and supports the approach to urban renewal set out in Paragraph 2.26 and the prioritisation of regeneration in Yate. The Parish Council considers that this approach has the potential to increase the viability and liveability of the urban area, improving opportunities and facilities for residents while reducing the need for new building on Greenfield sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | J. Bond |
| **Comment ID** | 17779105/472 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | The strategic structure Plan envisages far more housing than would satisfy local needs, and is excessive and inappropriate in places.<br><br>The aspirational aims for multi-modal, non-car, transport and for employment to be immediately adjacent to the housing needed by the relevant work force, is worthy but unrealistic.<br><br>People not in work need to find a job as soon as possible, a person has to find an employer who currently needs the skills he or she has to offer even if there is no such employer with vacancies locally. The only currently available job is likely to require transport home to work and vice-versa and it would be fortuitous if there happened to be a useable direct Public Transport route that would serve.<br><br>These days both husband and wife need to work. It is unlikely that "green" sustainable travel to work arrangements could be found for both. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alan Jones - Hanham District Green Belt Conservation Society |
| **Comment ID** | 17236353/500 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | * On reading 'Our focus going forward,' Clause 2.26 (Pg 31) of the Consultation Document, one can only wonder whether the Author has taken the time to visit the areas being reviewed. The predominant housing stock in these areas are, in the main 'ordinary.' To move this current townscape to the '.. new vision of urban living ..' wistfully described, is a quantum leap, rather than a 'shift in expectations.'<br><br>* To date, the current Planning appears to be 'more of the same' as recent development sites comprise standard housing units 'off the shelf' of national housebuilders. It would appear that overnight, from 'somewhere else' there is going to be a new bold dawn of architecturally enhanced accommodation.<br><br>* Do we see this at Magpie Bottom, Hanham - where McCarthy & Stone are erecting one of their signature blocks of retirement flats? No! So where is this new approach going to come from - certainly not from the overworked Planning Department in SGC's Offices!<br><br>* The Clause mentions '.. potentially new public investment ..' Where from? This opening statement is a long-way from reality!<br><br>* As far as we are aware, the District Shopping Centres in South Gloucestershire are in corporate ownership and any master plan for 'Town Centre regeneration' will have to be in partnership with them. Retail footfall is declining, year on year and whilst it is possible these areas could be redeveloped, funding would have to be generated by these corporate entities, constrained by uncertain longterm economics.<br><br>* Opportunities for investment in Historic Assets, public realm and urban tree stock could start with the historic village pound at Hanham Abbots, within the Green Belt. The remains of this historic structure has recently been exposed from the undergrowth by concerned volunteers, now requires protecting from cars parking close by and needs signposting and the erection of information boards to broaden interest and appreciation of this historic site. |

| | |
|---|---|
| | * The interest in investing in Historic Assets is another quantum leap, when compared with the dereliction of The Whitfield Tabernacle, a world Historical Asset, suffering from at least 40 years of neglect and only located a few hundred metres from SGC's Offices in Kingswood!!<br><br>* Where does this change of heart come from??<br><br>* Where will the money come from??<br><br>* Had the Author visited our area, they would have observed that the aspiration to Identify key sites for change through redevelopment is underway, as under-utilised premises in High Street locations/employment sites, etc are being redeveloped in a piecemeal-manner, to suit individual commercial opportunities, without any SGC masterplan - opportunity for 'fundamental change' lost!!<br><br>* Identifying the Community Services and Facilities….<br><br>How will these be funded??<br><br>* Different Parking and Open Space Standards:<br><br>* This section is a mixture of issues - firstly without identifying any areas of green spaces that are underused/poorly connected/poorly maintained, how can SGC expect a meaningful response?? Reference to street trees affecting the quality of life and character of urban areas is fatuous - surely trees offer advantages in lowering the CO2 contamination, provide shade in Summer and improve the visual appearance of any street?<br><br>* Oh - maybe it's because they need to be trimmed, pruned and maintained - that is the problem!!<br><br>* Key Transport Infrastructure Opportunities:<br><br>* The current transport initiative of the MetroBus is awaiting its first passenger - expenditure and years of traffic disruption!!<br><br>* Future '.. opportunities ..' need very careful pre-planning and community buy-in.<br><br>* Explore Policy Options:<br><br>Unaware what is meant by this - surely this is standard practice!<br><br>* How on earth will 'Place Making' encourage active & healthy Lifestyles? |
| **Attached documents** | Hanham District Green Belt Conservation Society (Alan Jones).pdf (20.3 MB) |

| | |
|---|---|
| **Respondent Name** | Roy Crew |
| **Comment ID** | 3973121/529 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | My responses to the specific Local Plan Questions:<br><br>Question 1:<br><br>I can not see where the money is coming from, a developer will move in maximise is profit and then find every reason for not putting money into the area even to correct problems caused.<br><br>A typical example was the recent development on the corner of Whittucks and Abbots Road.<br><br>A warning was given about the drainage of this boggy area, the developer built his houses and moved on. This left the Council at Council Taxpayer's expense to install new drains at considerable expense! |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Daphne Dunning - Cromhall Parish Council |

| | |
|---|---|
| **Comment ID** | 16475073/601 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | 1. Urban Living:<br><br>The Council agrees that Brownfield sites should be targeted for development and would also state that specific Greenfield sites should also be considered for development under strict criteria.<br><br>Greenfield sites that offer a simple transition into an already formed infrastructure or are located in such a position that complete transport, employment and welfare, Schooling, domestic and leisure services can easily be established as a whole and built as a whole concept - without a detrimental impact on the existing and surrounding communities.<br><br>Just 'plonking' a development in an area because there is space to build but which clearly has and will never have the ability to cope with such developments is not acceptable.<br><br>Unfortunately from ALL of the meetings, briefings, glossy PR Brochures and 'new' Plans that the Council has seen over the last few years, it can draw no other conclusion than that this all may work well for towns, large enclaves and extended suburbs with established infrastructure, functioning employments hubs and Transport Networks, or that can attract investment, but it is a disaster in waiting for the rural locations at the top end of S. Glos. Here the proposal is to essentially shove any housing allocation that can't be fitted in anywhere else, despite the knowledge that there is little or no infrastructure of any meaningful quality to cope with the existing population and it is proposed adding a hugely disproportionate quantity of houses to an area that will NOT see the major investment targeted for other areas or fundamental infrastructure growth required.<br><br>The Council has asked your Representatives many times just how you expect to fund the new roads needed, to cope with a ten-fold increase in traffic, the new Schools, welfare zones, employment, the almost non-existent Public Transport links and the Council are yet to hear ONE definitive answer on ANY of the questions posed or where the money will come from.<br><br>SGC is making decisions in that in reality WILL put the existing residents of North S. Glos in a position of increased danger and disadvantage as even at the most basic level, it will be less likely to receive acceptable Emergency Service response, there will be 1,000's more HGV and multiple thousands more cars on the roads, all travelling down 'B' Roads and country lanes (the only roads there are) and through rural villages towards the bottleneck of Junction 14 of the M5.<br><br>In all previous letters to SGC on this subject the Council has been consistent in its response and pleaded for some sense to prevail but there appears to be NO willingness to look into the future, when all of these housebuilders have made their money and left the scene. They may have prettied up the road to their housing estate or made a token gesture to the immediate community BUT they will not have provided a Dual Carriageway from Yate to J14 of the M5, made the vital improvements that MUST be made to J14, provided a Hospital, further education sites, new Secondary Schools (the current Secondary School serving North S. Glos actually sits in Gloucestershire and has already reduced its catchment area), a solution to how upwards of 10,000 people are supposed to commute to work, to the distant shops or to School without an effective bus or train system… This list goes on, and on, and on.<br><br>The Council recently attended the Buckover Village Workshop and has great concerns with regards to the lack of joined up thinking between building projects and their impact on areas outside of their immediate vicinity. The Buckover Development Team actively believe that they can reduce the flow speed of the A38 to accommodate a Village type road through Buckover. There is no wider thinking associated with traffic flow through the A38 when the all too regular accidents occur at M5 Junctions South of Junction 14. A slower more congested A38 will push even more traffic down the Country lanes bordering J14. In fact there are so many transport impact issues raised from the Workshop that these would need a whole Response of its own. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Zoe Hancock - Bristol Avon Catchment Partnership |
| **Comment ID** | 19832225/672 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Overall, the BACP supports the proposed approach to Urban Living. We would note the following:<br><br>• Whilst intensification of development on existing urban or Brownfield sites is supported, we hope that the LPA supports securing green space within new sites to accommodate SuDS whilst contributing to placemaking, wellbeing and water quality.<br>• We welcome the acknowledgement that investing in the recreational and Biodiversity value of green space and water is important for people's wellbeing and Climate Change impacts. As the new approach developments, we would welcome further discussion on how these aspects could be set out in Policy and used to develop multifunctional open space solutions, which also address Sustainable Drainage Systems, flood storage and water quality improvements alongside Biodiversity and Climate Change adaptation and mitigation.<br><br>• A design-led approach would ensure that minimum standards are met in terms of providing good accessibility to high quality local facilities including different types of green spaces, which are not oversubscribed and multifunctional green infrastructure alongside the new standards for high density. If these quality standards (or other minimum proposed standards) are not mandatory, it is unlikely that these will be delivered through major residential schemes. There is also a potential risk that new density standards could come into conflict with other Policy aspirations such as the provision of green space and multifunctional green infrastructure (including SuDS). This could be addressed through a needs assessment for an area beyond the redline boundary of proposed developments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Chelverton Developments Ltd |

| | |
|---|---|
| **Comment ID** | 16478625/730 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Q1 – New Approach to Urban Living:<br><br>Chelverton is generally supportive of the Council's intended Policy approach for delivering 'Urban Living' through higher density development at sustainable urban locations. It is considered that Yate has been correctly identified as an 'opportunity area' where this approach can boost housing delivery, reinvigorate centres, and make better use of underutilised land by introducing mixed use. The approach is likely to encourage diversification of the housing market by creating opportunities for smaller homes, build-to-rent models and specialist accommodation, thus complementing more family-focused housing developments that will continue to be needed on larger, Greenfield sites.<br><br>It is important to ensure that an adequate range and quantum of deliverable non-strategic Greenfield housing sites are allocated in the Local Plan, informed by an accurate assessment of the housing contribution that is likely to be made through urban living. This will ensure that all facets of housing need/demand are planned for. In this regard, the Development Strategy for the Yate/Chipping Sodbury area can and should provide for proportionate non-strategic Greenfield housing development to supplement new housing likely to come forward through the urban living approach. This is especially important in Chipping Sodbury where the historic nature of the Town Centre provides limited scope for delivering new housing through urban living principles but where there are identified wider opportunities for sustainable growth. In this way, Chipping Sodbury (one of the three largest places identified for further investigation for non-strategic growth) will be able to make an appropriate and necessary contribution to prevailing housing needs over the Local Plan Period. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | James Carpenter - Falfield Parish Council |
| **Comment ID** | 16617825/736 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Higher density development in existing town centres has advantages in terms of proximity to amenities and commuting times and we encourage the development of Brownfield land as opposed to open countryside and agricultural fields. Challenges are already identified in the Plan on the knock on effect of increased pressure on Public Transport and roads, problems relating to on street car parking, pressure on community services and health facilities.<br><br>In section 2.26 it mentions a potential Policy which may include different parking standards for parts of our urban areas. Reducing residents parking provision is rarely a good idea and leads to on street fly parking.<br><br>As a rural Parish Council we are concerned that if parking provision in the urban areas is reduced, that this may adversely affect those living in rural Parishes that often have no other practical option than to use their own private motor vehicle to travel to use the services and facilities which are based in the urban areas. Rural dwellers often cannot walk or cycle to these locations due to the distances involved, the road conditions and less choice and timetabling of Public Transport.<br><br>For example, travelling from Falfield to Kingswood or Yate Council Offices is a difficult cross country journey which is time intensive if attempted by Public Transport, if not impossible at certain times e.g. evenings. Parking provision at Kingswood is poor and this deters people from using their public facilities and prevents engagement which leads to rural isolation.<br><br>The Local Plan for the urban areas must factor in the needs of daily visitors to the facilities as well as those who live there in terms of joined up Transport Interchanges plus sufficient, safe and cost effective parking nearby. |
| **Attached documents** | Falfield Parish Council (Mr. James Carpenter).pdf (1.9 MB) |

| | |
|---|---|
| **Respondent Name** | Heather Elgar - West of England Nature Partnership |
| **Comment ID** | 19839553/784 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Please find below Comments from the West of England Nature Partnership (WENP) in response to the South Gloucestershire Local Plan Consultation.<br><br>For transparency, please know that Dominic Mellon (Consultant in Public Health for South Gloucestershire Council) sits on the WENP Board and thus note a declared conflict of interests. This Response reflects the aims and objectives of the Partnership and does not reflect views of individual Board members.<br><br>Question 1: New Approach to Urban Living:<br><br>The West of England Nature Partnership (WENP) supports the principles of Urban Living, which promote more sustainable modes of living where effectively combined with Transport and Economic Strategies, so long as green infrastructure is effectively built into, upwards and across developments so as to provide the green space people and wildlife need to flourish. As such, WENP strongly welcomes the Plan's acknowledgement of the importance of green space for health and wellbeing, and the acknowledgement that green infrastructure is an important and equal aspect of infrastructure (P. 4).<br><br>WENP also welcomes the 'stronger focus on regeneration to realise the development potential of Brownfield sites in urban areas' (P. 4), but cautions that, in some cases, Brownfield sites can have high Biodiversity value. As such, these sites should be developed in mind of strategic green infrastructure principles, which are expected as part of the emerging West of England Green Infrastructure Plan. |

| | |
|---|---|
| | As acknowledged on P. 30, development will ‘increase demand on green spaces, Biodiversity and wildlife habitats.’ In the Strategic Planning for multifunctional green infrastructure, it is important the needs of wildlife are safeguarded and enhanced alongside people’s accessibility to quality green space.<br><br>WENP recommends the promotion of the Building with Nature Benchmark across developments, which considers the effective design of green infrastructure across and between developments, and at all scales. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | SPM Homes Ltd |
| **Comment ID** | 19732097/819 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | In addition to the locations identified under Paragraph 2.22 of the Consultation Draft, the writer submits that Almondsbury should be added to the list of the areas offering the greatest opportunity for change. Almondsbury is well located close to the North Fringe Cluster and can easily accommodate additional growth to assist in the support of the Northern Fringe. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ian Beckey |
| **Comment ID** | 19952961/902 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | 1. Urban Localities - Staple Hill, Kingswood and Hanham:<br><br>***Light Rail Around Bristol and Bath:***<br><br>*We support the principles of a Light Rail Route to Bristol Airport as a top priority and later to Bath especially from Lambridge across the City to Newbridge which could then make use of the Light Rail Corridor to Bristol through Bitton, Saltford, Kelston, Warmley to Yate and East Bristol via Mangotsfield, Staple Hill and Fishponds (with a Light Rail/Bus Interchange there for the UWE) as well as linking into the RUH at Weston, the new Bath Spa Art & Design College at Weston Lock and Park & Ride sites which need to be co-ordinated with the Bristol Mayor's Rapid Transit Project. The two schemes must link to Staple Hill and Fishponds (with a Light Rail/bus located Interchange there for the UWE), Warmley and the Bristol and Bath Science Park at Emersons Green. Retention of Avon Valley Railway Steam services at weekends. Provision should be made for a continuous cycle/walkway between Bristol and Bath where possible. The implementation of Light Rail will help bring the City region into line with EU emission and clean air targets together with clean fuel buses and taxi's.*<br><br>*The corridor to Odd Down is welcomed however the majority of the traffic is to the Somer Valley at Peasedown, Radstock and Midsomer Norton and therefore an extension of a Rapid Transit System to this area would be beneficial. What evaluation of the Somerset and Dorset Railway Corridor has been carried out as Norton Radstock is an Enterprise Zone and needs Public Transport improvement.*<br><br>*The route to Bath University seems to have gradient constraints and requires considerable engineering works and it should also be noted that all LRT schemes approved in the UK have been conurbation wide e.g. Midland Metro (Birmingham - Wolverhampton), Greater Manchester, Nottingham and Croydon and will require DFT funding and approvals in the long term and in the short term to be in the Metro Mayor's Joint Transport Plan.*<br><br>*We need to improve the Bus Networks to Kingswood, Hanham and Staple Hill from Bristol City Centre, Bristol Parkway, Cribbs Causeway/ Southmead Hospital and Bath (including the RUH) and Route 16 to Cossham Hospital - UWE - Bristol Parkway.*<br><br>*Each Town Centre should have a Transport Hub improving bus shelters, taxi's and real time information including toilets and signposting to local heritage sites (Kingswood Museum and Wesley's Whitfield Tabernacle).*<br><br>*Kingswood and Staple Hill both need major regeneration - shops, houses, hotel and MetroBus stops jointly with Bristol City Council.*<br><br>*A new Light Rail Station at Warmley could be an Interchange for Kingswood.*<br><br>*Air quality is a huge issue for this area.* |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ian Beckey |
| **Comment ID** | 19952961/903 |
| **Document Part Name** | Question 01 New Approach to Urban Living |

| | |
|---|---|
| **Comment** | 2.27, 2.28 & 3<br><br>Local Communities:<br><br>***Bus/Rail Integration:***<br><br>*This is required at Bath Spa Station and other locations where Light Rail might possibly connect with buses. Across Europe and Greater Manchester/London Rapid Transit is fully integrated into the bus network. We need to make progress on bus/rail integration at Temple Meads as the proposed Temple Gate stops do not work for passengers.*<br><br>*On rail we welcome the work on disabled access at Stapleton Road and Patchway but the Stapleton Road temporary ramps do not provide good access without grab rails.*<br><br>*There should be investment in MetroWest between Westbury, Bath and Bristol currently out for Consultation with the DFT as part of the GWR Franchise with First Group as the operator until 2022. This could include a business unit for Bristol and Bath, Somerset, Gloucestershire and Wiltshire & Greater Bristol.*<br><br>*SWTN also want to see the GWR Franchise kept as one complete business unit and not split up as proposed by the DFT. The GWR IEP Electrification Programme should also be completed in the shortest possible time to assist with high technology rail job creation opportunities in the region together with the Henbury Loop Rail Project serving the proposed Arena, Filton North and Henbury with an extension to St. Andrews Road (Severnside) to connect with the Severn Beach Branch (major employment site and destination for tourists on the Severn Walkway - the village is in need of investment).*<br><br>*The Gloucester Line serving Ashley Down, Horfield, Filton Abbey Wood, Bristol Parkway, Yate (investment in housing and employment and urban living), Charfield (welcome new housing there), Cam and Dursley, Stonehouse and Gloucester.*<br><br>*Patchway and Pilning need investment as part of the housing and Enterprise Areas with new footbridges and disabled facilities i.e. Shelters, car park and CCTV.*<br><br>*There should also be a Greater Bristol business unit within the GWR Franchise with devolved powers similar to the West Midlands and Greater Manchester PTE's.*<br><br>*Bus proposals can be included as should future schemes e.g. Light Rail integration and the Overground Rail Project in Bristol.*<br><br>*The Westerleigh Line should be protected for rail freight and future Light Rail to Bristol from Yate, Staple Hill and Fishponds. We would like to see a new station at Coalpit Heath as part of the new housing on the South Wales - Parkway Line.*<br><br>***Bus Strategy:***<br><br>*There should be no cuts in bus subsidies but more investment in the local bus network with the Metro Mayor and these issues must be addressed alongside any Light Rail proposals in Bristol and Bath especially where services like the 16 from Bristol Parkway to Longwell Green via Lodge Causeway have already been cut leaving residents with no buses. The 510/511 bus services should also be reinstated as part of an improved orbital bus network including Yate, Thornbury, Kingswood, Staple Hill, Bath and villages towards Wotton Under Edge and Gloucester.*<br><br>*Passengers interchanging between bus/rail routes should have accessible toilet facilities on key routes with money for maintaining/cleaning bus shelters/bus bays. These should include facilities at Shirehampton Green, Eastville Park and Fishponds Park. One way to fund Public Transport would be to use money raised by parking fees instead of spending it on non transport infrastructure projects like pavement repairs. These toilets are also used by bus drivers and passengers on routes around Bristol. Has an Equalities Impact Assessment been carried out regarding the closures and any new facilities? Of course in South Gloucestershire, BANES and North Somerset have protected these facilities as part of the network.*<br><br>*We remind you that the tourism industry in Bristol is worth and we do not want the reputation damage to Bristol so these facilities including community toilets and private sector transfers must work.*<br><br>*Cross boundary working on 20mph zones review with South Gloucestershire Council in East and North Bristol and would like to see parking standards for new electric cars.*<br><br>***Arena Issues:***<br><br>*A full Transport Plan would need to be drawn up with First Group on whichever site the Mayor and Metro Mayor decide.* |

| | |
|---|---|
| | *Temple Meads Arena would require coach parking, MetroBus stops, coach stops in Avon Street, bus stops at this location and on Bath Road Park & Ride services from Brislington, Parkway, Portway, Ashton Vale, extra trains from Bath and West Wilts, Taunton, W-S-M, Cardiff, Newport, Patchway, Filton, Yate, Gloucester/Cheltenham, Severn Beach via Clifton Down, Henbury Loop, Portishead and Swindon.*<br><br>*Regarding a shuttle train from Bristol Parkway to Temple Meads, taxi ranks, ferry terminal, service coaches and car parking including disabled.*<br><br>*Construction of Station Street and Bus Interchange at the Friary is required as part of the new University Campus development at Temple Meads.*<br><br>***Brabazon Hanger Option:***<br><br>*Potential Arena will require coach parking, MetroBus stops, coach stops, bus stops at this location and on Park & Ride services to Brislington, Parkway, Portway, Ashton Vale, extra trains from Bath and West Wilts, Taunton, W-S-M, Cardiff, Newport, Patchway, Filton, Yate, Gloucester, Cheltenham, Severn Beach via Clifton Down, Henbury Loop, Portishead and Swindon. There should be 15 minute frequency services on the Henbury Loop serving the Arena and 10 minute shuttle bus service on main routes to it.*<br><br>*The IET trains will need to operate from London and South Wales via Parkway to Filton North Station for the Arena, services from the South West, West Midlands to the Henbury Loop Station, coach parking will need to be provided, taxis, bus links Greater Bristol wide, links to Cribbs Causeway and hotels will need to be addressed.*<br><br>*We urge the City Council, WECA and Bristol Mayor's to address a full Integrated Transport Plan for the Arena similar to those at Manchester Victoria/Wembley.*<br><br>*The Arena rail services will need to be included in the new rail franchise.*<br><br>*Whilst we welcome fully the City Business Plan, transport outcomes which are in-line with the congestion task group the main issue that we need to address is to get the MetroBus Rapid Transit Network fully operational on all lines and routes especially the South Bristol Link (Hengrove - Hartcliffe to the Floating Harbour and City Centre/Temple Meads) and the link via the M32 to UWE, Bristol Parkway, Aztec West and Cribbs Causeway along with routes already commissioned (Emersons Green - Bristol M3), Hengrove - Bradley Stoke and Cribbs Causeway M2).*<br><br>*We need to commission with public subsidy through WECA some of the start up services in South Bristol/North Somerset (perhaps X75, X76 to the City, Filton, Henbury, Patchway and Cribbs Causeway and across to Bristol Parkway and Emersons Green (MetroBus Phase 3).*<br><br>*There are concerns that if MetroBus is not successful then pushing forward with our first Light Rail Rapid Transit route to the Airport could be more difficult. Equally, MetroBus needs to show good progress on Interchanges at Temple Meads and Parkway so as to improve our chances of getting of MetroWest Phase 1 money for the Portishead and Severn Beach Lines.*<br><br>*We would urge the Mayor and Metro Mayor & WECA/North Somerset to sort out the commissioning of MetroBus so as we can plan the next phases of Rapid Transit/bus/Light Rail and heavy rail into a Metro Network for Greater Bristol which we need to work with First Group and Network Rail.*<br><br>***Thornbury:***<br><br>*We welcome growth at Thornbury including housing (mixed use and affordables, healthcare (Hospital) employment sites, good public realm) and protecting the rural location of the town as a service centre for the Severn Vale but we need to see MetroBus implemented between Aztec West, Parkway, UWE and Emersons Green. Support Thornbury MetroBus route stopping in the Bradley Stoke area as from 26th May 2018 as requested by First Group.* |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Eric Heath - Avon Wildlife Trust |
| **Comment ID** | 19883713/993 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | **This Response represents the views of Avon Wildlife Trust. We have members of staff and members. It has been drafted by the Head of Land Management with input from the Director of Conservation and Delivery Programmes and signed off by the CEO.**<br><br>AWT is broadly supportive of the approach to Urban Living. The drivers behind this new approach are all laudable, including the promotion of more sustainable forms of transport and improved Economic Strategies. We would echo the concerns highlighted on P. 30 particularly those around the increased demand for, and pressure on, green spaces.<br><br>In order to successfully deliver this approach green spaces are going to have to be multi-functional delivering multiple ecosystem services to justify their place within the urban mosaic. Given the concerns highlighted on P. 26 about underused and poorly connected green space it is vital that a Strategic Green Infrastructure Plan is a key part of any masterplanning for the roll out of this new approach to Urban Living. AWT therefore |

| | |
|---|---|
| | welcomes the statement on P. 4 which gives equal weight to Green Infrastructure and more traditional forms of infrastructure. It will be vital that Green Infrastructure is integrated into all developments at an early stage to ensure that the needs of wildlife are taken into account whilst ensuring people have access to high quality green space.<br><br>A design led approach with minimum standards for the delivery of all types of green space should be mandatory for all major residential schemes. AWT recommends the promotion of the Building with Nature benchmark, which considers the effective design of green infrastructure across and between developments and at all scales.<br><br>AWT are also concerned about the statement on P. 4 that there will be a *'stronger focus on regeneration to realise the development potential of Brownfield sites in urban areas.'* Whilst in the majority of cases Brownfield land is of minimal ecological value, it is true that occasionally Brownfield sites are exceptionally ecologically rich. AWT would therefore expect that each site brought forward for development is judged on its ecological merits and not have a predetermined valued according to its status as Green or Brownfield land.<br><br>AWT welcomes the acknowledgement that investing in the recreational and Biodiversity value of green space is important for people's health and wellbeing. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ann Weaver |
| **Comment ID** | 19808897/1003 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Please think again. Use disused city sites for new homes. Consider building some homes for older residents, and once and for all improve the bus service to encourage its use instead of cars. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Cate Davidson - Sodbury Town Council |
| **Comment ID** | 4877793/1004 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Dear Planning Team,<br><br>Sodbury Town Council responds as follows to the Local Plan (non strategic) Consultation:<br><br>Q. 1 STC agrees with the intended Policy.<br><br>Please note the Comments as appropriate. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Andrew Rigler |
| **Comment ID** | 1029377/1045 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | 5. There is a need to improve transport links, also parking to encourage car sharing and address the need for Town Centre parking. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Gill Pirie |
| **Comment ID** | 19840321/1053 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Brownfield sites across South Gloucestershire should be identified first before the devastation of Hanham Village community and natural Green Belt right on the outskirts of the County. Once our heritage is lost it is gone for ever. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Adrian and Judy Howourth |
| **Comment ID** | 19843649/1056 |
| **Document Part Name** | Question 01 New Approach to Urban Living |

| | |
|---|---|
| **Comment** | There is adequate space within the existing designated building areas and within the existing 'urban' area to easily accommodate the requirements of Central and Local Government targets without the need to destroy nationally critical and protected Green Belt areas. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Clifton Homes Ltd |
| **Comment ID** | 16617921/1078 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | **Please see submitted Representations.** |
| **Attached documents** | Clifton Homes Ltd - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (1.7 MB) |

| | |
|---|---|
| **Respondent Name** | Barwood Development Securities Ltd and The Thornbury Landowner Consortium |
| **Comment ID** | 19884545/1093 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Please find attached Representation. |
| **Attached documents** | Barwood Development Securities Ltd and The Thornbury Landowner Consortium - Savills (Miss. Felicity Tozer).pdf (650 KB) |

| | |
|---|---|
| **Respondent Name** | South West Strategic Development and Ian and David Knipe |
| **Comment ID** | 19884577/1102 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Please see submitted Representations. |
| **Attached documents** | SW Strategic Development and I. and D. Knipe - Grass Roots.pdf (27.4 MB) |

| | |
|---|---|
| **Respondent Name** | Progold Ltd |
| **Comment ID** | 19737665/1116 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Please see submitted Representations. |
| **Attached documents** | Progold Ltd - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (7.9 MB) |

| | |
|---|---|
| **Respondent Name** | Susan E. Green - Home Builders Federation (HBF) |
| **Comment ID** | 10761601/1131 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | The Council's proposed housing requirement of 32,500 dwellings is based on the West of England (WoE) JSP which has not yet been tested at Examination. The HBF is supportive of the WoE JSP to provide a high level strategic Planning Policy Framework for its constituent Authorities comprising of Bristol City, Bath & North East Somerset (BANES), North Somerset and South Gloucestershire for the Plan Period 2016 – 2036. However as set out in HBF Representations to Consultations on the WoE JSP the HBF profoundly disagrees with the Council's calculation of Objectively Assessed Housing Needs (OAHN). It is considered that the OAHN for the WoE Housing Market Area (HMA) has been under-estimated and the OAHN for the HMA is greater than 102,200 dwellings (5,110 dwellings per annum). This under-estimation arises from overly conservative approaches to improving housing affordability (only +9,400 dwelling adjustment applied), no "Policy on" adjustment to the housing requirement to help deliver Affordable Housing despite a significantly sizable identified Affordable Housing need and low economic growth assumptions so that the lack of housing itself could become a constraint on economic prosperity.<br><br>Indeed in South Gloucestershire the housing requirement should account for the specific impact of the construction phase of the Oldbury New Nuclear Build. For comparative purposes the Government's proposed standardised methodology for the calculation of OAHN using only household projections and housing affordability excluding any uplift to support economic growth results in 116,500 dwellings (5,825 dwellings per annum) for the HMA between 2016 - 2036. The establishment of a housing requirement figure based on a correct OAHN is the fundamental starting point for the South Gloucestershire Local Plan. It is essential that the Council's proposals for the distribution of housing growth across the District are based on a correctly derived housing requirement.<br><br>The proposed timeframes of the WoE JSP 2016 – 2036 and the South Gloucestershire Local Plan 2018 – 2036 are also misaligned. It is important that the timeframes of the two Plans are the same so that housing needs between 2016 – 2018 are met. If there is a misalignment of timeframes there is a serious risk these housing needs will become lost and not accounted for.<br><br>The HBF agree that the housing requirement of South Gloucestershire should be met by a combination of Strategies including the construction of existing Consents (circa 22,300 dwellings), maximising the use of Brownfield land (circa 2,900 dwellings), 5 Strategic Development Locations (SDL) as identified by the WoE JSP at Charfield, Thornbury, Yate, Coalpit Heath & new Garden Village at Buckover (circa 6,000 dwellings plus a proposed contingency of 775 dwellings at Chipping Sodbury & 225 dwellings at NW Yate to be released at the time of the 5 yearly Plan Review if |

| | |
|---|---|
| | needed) and non-strategic sites in the rural area (circa 1,300 dwellings plus a proposed contingency of 500 dwellings to be released at the time of the 5 yearly review if needed).<br><br>However this agreement is not an endorsement of the Council's proposed quantum of development in each category or the selection of individual sites. The HBF have no Comment on the selection of individual SDLs or other non-strategic sites. Nevertheless it is noted that the proposed SDLs have not yet been tested at the WoE JSP Examination. If any SDL located in South Gloucestershire or elsewhere in the WoE was found unsound there would be repercussions for the Council's Housing Land Supply (HLS). Similarly if the quantum of dwellings assumed in maximising the use of Brownfield land was over-estimated any subsequent reduction would have consequences for the Council's HLS. The Council has identified 4 Urban Living Opportunity Areas including North Fringe Cluster (Cribbs Causeway, Patchway, Filton Airfield, Harry Stoke & Stoke Grifford), East Fringe Urban Centres (Staple Hill, Kingswood & Hanham) and Yate. The revised NPPF emphasises the effective use of land rather than maximising the use of Brownfield land and in principle the HBF is supportive of the efficient use of land. The HBF agree that it is appropriate to encourage the development of higher densities in appropriate locations such as those benefiting from good Public Transport connections but an increase in density across most areas should only be applied with caution.<br><br>In this Consultation the Council has provided very little information on the achievement of higher densities in these Urban Living Opportunity Areas. Density should be appropriate to the area in which the development is located. It is inappropriate for all development to be of a higher density than the prevailing character of the area. The Council should not impose densities that are unacceptable to local communities and/or make no commercial sense to developers. Density intensification is not a panacea to meeting housing needs. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Emma Powell - Redrow Homes Limited |
| **Comment ID** | 19737921/1147 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Part 2 - A New Approach to Urban Living:<br><br>The new approach to Urban Living i.e. to maximise the use of Brownfield land within the urban areas for residential and employment is supported. It is noted that there has been an assessment of the potential to improve and restore the status and performance of the urban areas. The Council commissioned the Nash Report to review the capacity of urban localities to support the growth.<br><br>The Plan sets out the advantages and also documents the challenges to this approach and the potentially negative impacts which the Plan will need to address.<br><br>This approach of assessing the capacity and focus on increasing density is consistent with the Draft NPPF. However, this is **only one element** of the approach to new development, **importantly only a combination of the elements** will deliver the scale of development needed and provide the choice across all communities.<br><br>Non-strategic sites such as Land off Bristol Road, Hambrook are key to ensuring housing delivery in the Plan Period. |
| **Attached documents** | Redrow Homes Limited (Emma Powell) - Pegasus Group (Mrs. Sarah Hamilton-Foyn).pdf (34.1 MB) |

| | |
|---|---|
| **Respondent Name** | BAE Systems Pension Funds Trustees Ltd |
| **Comment ID** | 19738113/1169 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | As per the Bullet Points in Paragraph 2.26 of the Draft Plan, it is considered that a variety of Policy mechanisms will be required to help achieve the Urban Living objective. Whilst the approach of identifying broad locations at the North Fringe Cluster, and the East Fringe Centres is effective, a more site specific approach could also be taken where sites outside of these broad locations are identified to help improve the density and efficiency of land uses in sustainable locations. Alternatively, a broad set of Policy criteria could be established to enable a flexible approach to the achievement of urban living principles on unallocated sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Phill Bamford - Gladman Developments Ltd |
| **Comment ID** | 15612065/1175 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | ## 3.1 Question 1 – New Approach to Urban Living:<br><br>3.1.1 One of the stated intentions of the SGLP is to maximise Brownfield development to create more homes and jobs with more and higher density development around Town Centres, providing a greater variety of homes by introducing more flats and smaller homes and the redevelopment of underused land and buildings. |

| | |
|---|---|
| | 3.1.2 The SGLP identifies that this approach does bring with it certain challenges which need to be balanced against the need to regenerate these areas including disruption to existing communities, increased demand on limited green space, increased pressure on existing environmental public realm and increased transport and air quality related issues.<br><br>3.1.3 Whilst the Government encourage the re-use of Brownfield land, the Council will need to consider whether this approach is truly viable, whether it can be delivered and whether this form of development will address other issues such as affordability, as many redevelopment schemes do not provide Policy compliant levels of Affordable Housing. Clear evidence will need to be gathered to justify the choice of redevelopment sites and to ensure that the SGLP is ultimately deliverable. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Bovis Homes Limited |
| **Comment ID** | 20044801/1200 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Please refer to enclosed letter. |
| **Attached documents** | Bovis Homes Limited - Rapleys LLP (Mr. Tony Clements).pdf (259 KB) |

| | |
|---|---|
| **Respondent Name** | Lidl UK GmbH |
| **Comment ID** | 20050593/1210 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | The West of England Joint Spatial Plan (JSP) has identified that 2,900 additional homes, as well as further employment opportunities will be delivered within the urban areas of South Gloucestershire up to 2036. This includes the main urban areas of Bristol's North and East Fringes as well as the settlement of Yate. It has been identified within the Consultation Document, and particularly at Paragraph 2.18 that a change in approach to delivering sustainable growth in these urban areas is required to respond to the aspirations of the JSP and national and local employment and demographic trends. This includes the underuse of land being used for employment or safeguarded for future employment uses. Of particular relevance to this Representation, is the proposed new approach to sustainable growth in the North Fringe Cluster which includes the areas of Cribbs Causeway, Patchway, Filton Airfield, Harry Stoke and Stoke Gifford.<br><br>Paragraph 2.19 states that if the Council continue with their current approach to directing growth in line with existing Planning Policy, the high growth ambitions and requirements of the JSP cannot be achieved. However, it is considered by the Council that there are opportunities for a change in approach which would make a significant impact on using employment land more productively and 'ensure access to a range of employment opportunities for all our communities to reduce inequality.'<br><br>The New Approach proposes the development of underused land and buildings to enhance existing employment sites, as well as some changes of use from land which is currently safeguarded for business uses to mixed-use or just residential use. This proposed approach is supported by Lidl and considered to offer a number of significant benefits to the sustainable growth of the North Fringe Cluster including:<br><br>o Diversifying the local economy of neighbourhoods will revitalise employment areas and ensure long-term economic prosperity for communities;<br><br>o Providing a mix of uses on sites close to existing and planned residential development would reduce the need to travel which in turn can reduce congestion on major routes in and around Bristol; and<br><br>o Positively planning for the growth agenda by providing a sufficient range of employment land and premises to meet the needs of business and delivering a range of good job opportunities accessible to all communities.<br><br>Given the nature of Lidl's operation, it is considered that the new approach to incorporate a mix of uses on suitable sites provides a significant opportunity to provide for the retail services required by the growing population of Bristol, and to ensure the long-term health of existing residential areas such as Charlton Hayes and planned residential growth at Filton Airfield.<br><br>Paragraph 2.26 identifies the need for a different delivery model to focus on creating urban density, structure and character in appropriate locations. Lidl agrees with and supports the approach to identify key employment sites for re-designation to mixed-use, where this would improve place-making and improve accessibility for the local community to local employment, services and facilities. It is agreed that there are a number of site opportunities in the North Fringe Cluster that have the potential to significantly improve the identity of the locality, maximise the use of land and enhance connectivity across the area and realising these opportunities should be a key focus going forward.<br><br>In light of the above, it is recommended to proceed with the consideration of a new approach to delivering sustainable growth in the Urban Areas of South Gloucestershire. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Malcolm Pink - John Alison Land & Research Ltd |
| **Comment ID** | 19458817/1232 |
| **Document Part Name** | Question 01 New Approach to Urban Living |

| | |
|---|---|
| **Comment** | Fully support the Council in their new approach to Urban Living and support a bold approach. Also support the view that because of the dangers of poor integration with the existing community in urban areas, the Council may need to designate special Planning status for each of the proposed areas, which masterplans in more detail the development requirements. The Council should not be afraid of making this prescriptive, particularly for: design of the built form, materials, public realm, involvement of community stewardship organisations to support change, setting strict timescales for delivery of improvements to infrastructure including Schools and services and requirements for size and locations of suitable green spaces as well as early delivery. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Messrs Keller, Grace, Moorlen and Barnes |
| **Comment ID** | 19889409/1233 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Part 1 (Housing Requirements) and Part 2 (Spatial Strategy) including Questions 1, 2, 3 and Strategic Development Locations:<br><br>Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Messrs Keller, Grace, Moorlen and Barnes - Pegasus Group (Mr. Daniel Weaver).pdf (423 KB) |

| | |
|---|---|
| **Respondent Name** | IM Land Ltd and The Davison Family |
| **Comment ID** | 19925889/1289 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Please see enclosed Representations Report on behalf of IM Land Ltd and The Davison Family prepared by Peter Brett Associates dated 30th April 2018. |
| **Attached documents** | IM Land Ltd and The Davison Family - Peter Brett Associates (Mr. Colin Danks).pdf (673 KB) |

| | |
|---|---|
| **Respondent Name** | Hanham Community Trust (Land at Hanham Community Centre) |
| **Comment ID** | 19926241/1325 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | As per the Bullet Points in Paragraph 2.26 of the Draft Plan, it is considered that a variety of Policy mechanisms will be required to help achieve the Urban Living objective. Whilst the approach of identifying broad locations at the North Fringe Cluster, and the East Fringe Centres is effective, a more site specific approach could also be taken where possible as this would provide more detail and certainty for landowners and/or developers with an interest in these sites. For sites outside of the identified urban living locations, a broad set of Policy criteria could be established to enable a flexible approach to the achievement of urban living principles on sites that are not allocated or within the identified urban living zones.<br><br>Overall, the proposed approach is supported at this stage as a positive and proactive method by which to realise the urban living objective in communities within South Gloucestershire. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hanham Community Trust (Land at Hanham Sports Ground) |
| **Comment ID** | 20104449/1350 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | As per the Bullet Points in Paragraph 2.26 of the Draft Plan, it is considered that a variety of Policy mechanisms will be required to help achieve the Urban Living objective. Whilst the approach of identifying broad locations at the North Fringe Cluster, and the East Fringe Centres is effective, a more site specific approach could also be taken where possible as this would provide more detail and certainty for landowners and/or developers with an interest in these sites. For sites outside of the identified urban living locations, a broad set of Policy criteria could be established to enable a flexible approach to the achievement of urban living principles on sites that are not allocated or within the identified urban living zones.<br><br>Overall, the proposed approach is supported at this stage as a positive and proactive method by which to realise the urban living objective in communities within South Gloucestershire. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hanham Community Trust (Land North of Abbots Road) |
| **Comment ID** | 20107489/1367 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | As per the Bullet Points in Paragraph 2.26 of the Draft Plan, it is considered that a variety of Policy mechanisms will be required to help achieve the Urban Living objective. Whilst the approach of identifying broad locations at the North Fringe Cluster, and the East Fringe Centres is effective, a more site specific approach could also be taken where possible as this would provide more detail and certainty for landowners and/or developers with an interest in these sites. For sites outside of the identified urban living locations, a broad set of Policy criteria could be established to enable a flexible approach to the achievement of urban living principles on sites that are not allocated or within the identified urban living zones. |

| | |
|---|---|
| | Overall, the proposed approach is supported at this stage as a positive and proactive method by which to realise the urban living objective in communities within South Gloucestershire. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Daniel Kelly - South Gloucestershire Liberal Democrat Council Group |
| **Comment ID** | 10311137/1420 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | **Pg 31 – Our Focus Going Forward:**<br><br>Under Section 2.26 we believe there should be an additional Paragraph after the Third Paragraph, on identifying Policies to encourage roof gardens and other communal green spaces into the design of high density buildings, in order to aid wildlife and improve the quality of life for residents. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Taylor Wimpey |
| **Comment ID** | 20128769/1435 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | In principle we support the aim to maximise the use of Brownfield land within urban areas for residential, and employment, use. However, the new Local Plan merely restates the JSP level of provision from this source of 2,900 dwellings. Given Brownfield sites are often slower to deliver than Greenfield options and given the significant proportion of South Gloucestershire's supply that is suggested to be delivered from this source, we request that the Council provide additional justification to demonstrate that there are sufficient genuinely deliverable sites within the existing urban areas to accommodate this level of development.<br><br>We note that the Council has provided a 'Review of Potential' for the Urban Localities provided as part of the Evidence Base to the current new Local Plan Consultation (authored by Nash Partnership, November 2017). This Report states that its purpose is to review the capacity of urban localities to support the requisite growth that needs to be accommodated based on the Emerging JSP requirement. However, although this Report provides information about the demographic makeup of various localities and considers economic indicators (and other issues such as health and employment) in some detail the review fails to properly consider where the urban localities actually have sufficient deliverable sites to meet the requirement. The approach taken has not properly considered potential development areas at a sufficiently fine-grained level and has not given sufficient analysis to the potential barriers to delivery of such sites.<br><br>At any point in time Brownfield land is a finite resource (albeit one that is refreshed over long term cycles) and without sufficient evidence setting out historic levels, and remaining sources, of supply we do not consider it a sound approach to assume more than double the number of units can be accommodated within Urban Areas than on Non-Strategic development sites within the rural areas.<br><br>While we broadly support the JSP's Urban Living Agenda (and understand that the new Local Plan is seeking conformity with this strategic Policy), the maximisation of housing development in urban areas should not prejudice existing employment provision or exacerbate the economic imbalance which gives rise to unsustainable commuting patterns. While higher densities are preferable these may not be deliverable (given the myriad of constraints which are unique to each site) or desirable to local communities in specific parts of South Gloucestershire. Urban Living delivery targets must derive from a robust Evidence Base. For example, scheme viability is an important consideration which could have a consequential impact upon the identified development opportunities within urban areas and as a result, impact upon the deliverability of the JSP and associated new Local Plans. It is not clear from the existing Evidence Base supporting both the sub-regional and local Policies that viability has properly been considered.<br><br>As identified above, we do not agree with the overall level of housing provision planned for within South Gloucestershire as it is based on the suppressed level of OAHN currently included within the Draft JSP. The JSP housing requirement has not yet been subject to Examination by an Independent Inspector and it is our view that the overwhelming evidence suggests that this level of housing delivery will need to be increased to prevent the suppressed provision of new homes stifling the growth aspirations of the region. Accordingly, the housing requirement to be planned for in the Emerging new Local Plan will also need to increase.<br><br>The proposed approach to supporting Urban Living as a source of new development is generally supported, albeit additional robust delivery information is required. This is necessary to demonstrate that the required housing supply can be accommodated, in a timely manner, on sites within the Urban Area to accommodate at least 2,900 dwellings over the Plan Period and potentially more given the JSP overall requirement should increase. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ian Knipe |
| **Comment ID** | 20133153/1457 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | In principle we support the aim to maximise the use of Brownfield land within urban areas for residential, and employment, use. However, the new Local Plan merely restates the JSP level of provision from this source of 2,900 dwellings. Given Brownfield sites are often slower to deliver than Greenfield options and given the significant proportion of South Gloucestershire's supply that is suggested to be delivered from this source, it is imperative that the Council provide additional justification to demonstrate that there are sufficient genuinely deliverable sites within the existing urban areas to accommodate this level of development.<br><br>We note that the Council has provided a 'Review of Potential' for the Urban Localities provided as part of the Evidence Base to the current new Local Plan Consultation (authored by Nash Partnership, November 2017). This Report states that its purpose is to review the capacity of urban |

| | |
|---|---|
| | localities to support the requisite growth that needs to be accommodated based on the Emerging JSP requirement. However, although this Report provides information about the demographic makeup of various localities and considers economic indicators (and other issues such as health and employment) the review fails to properly consider where the urban localities actually have sufficient deliverable sites to meet the requirement. The approach taken has not properly considered potential development areas at a sufficiently fine-grained level and has not given sufficient analysis to the potential barriers to delivery of such sites.<br><br>At any point in time Brownfield land is a finite resource and without sufficient evidence setting out historic levels, and remaining sources, of supply it is not a sound approach to assume more than double the number of units can be accommodated within Urban Areas than on Non Strategic development sites within the rural areas.<br><br>While we broadly support the JSPs Urban Living Agenda (and understand that the new Local Plan is seeking conformity with this strategic Policy), the maximisation of housing development in urban areas should not prejudice existing employment provision or exacerbate the economic imbalance which gives rise to unsustainable commuting patterns. While higher densities are preferable these may not be deliverable (given the myriad of constraints which are unique to each site) or desirable to local communities in specific parts of South Gloucestershire. Urban Living delivery targets must derive from a robust Evidence Base. For example, scheme viability is an important consideration which could have a consequential impact upon the identified development opportunities within urban areas and as a result, impact upon the deliverability of the JSP and associated new Local Plans. It is not clear from the existing Evidence Base supporting both the sub-regional and local Policies that viability has properly been considered. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mr. Mike Kerton - Bloor Homes South West and Mr. Jeremy Sutcliffe - Baratt |
| **Comment ID** | 16646593/1467 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Please see attached Representations. |
| **Attached documents** | Bloor Homes South West (Mr. Mike Kerton) and Barratt (Mr. Jeremy Sutcliffe) - Barton Willmore.pdf (14.6 MB) |

| | |
|---|---|
| **Respondent Name** | Rebecca Thompson - Wallace Land Investments |
| **Comment ID** | 19935809/1472 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Firstly and fundamentally, the Council's proposed housing requirement of 32,500 dwellings is based on the West of England (WoE) JSP, which has not yet itself been tested at Examination. Whilst Wallace are supportive of the WoE JSP to provide a high level Strategic Planning Policy Framework for its Constituent Local Authorities (Bristol City, Bath & North East Somerset (BANES), North Somerset and South Gloucestershire) for the Plan Period 2016 - 2036, we disagree entirely with the Councils' calculation of Objectively Assessed Housing Needs (OAHN). The OAHN for the WoE Housing Market Area has been woefully underestimated. The approach taken to calculating the OAHN is overly conservative, the adjustment applied to improve housing affordability is simply too low (only 9,400 dwelling adjustment applied). A 'Policy on' adjustment has not been made, nor have appropriate economic growth assumptions been made.<br><br>By way of comparison the Government's proposed standardised methodology for the calculation of OAHN based on household projections and housing affordability alone, i.e. excluding any uplift to support economic growth, results in 116,500 dwellings over the period 2016 - 2036 for the HMA, in comparison to the WoE current calculation of a mere 102,200 dwellings. The establishment of a housing requirement based on a correct OAHN is fundamental to the start of the Local Plan, as stated in both the NPPF and NPPG Guidance. This must be rectified before the South Gloucestershire Local Plan proceeds any further.<br><br>It is also noted that the Plan Period for South Gloucestershire does not align with that of the WoE JSP, the former being 2018 - 2036 and the latter 2016 - 2036. The Plan Periods for the two should align so as to avoid any chance for housing needs between 2016 - 2018 being missed/ unaccounted for.<br><br>It is agreed that the housing requirement for South Gloucestershire should be met by a combination of Strategies, including the delivery of existing Consents (accounting for 22,300 dwellings), maximising the use of Brownfield land (approximately 2,900 dwellings) 5 Strategic Development Locations (SDLs) as identified by the WoE JSP (around 6,000 dwellings plus a proposed contingency of 1,000 dwellings across two further sites to be released at the time of the 5 yearly Plan Review if needed), and non-strategic sites in the rural area (circa 1,300 dwellings plus a proposed contingency of 500 dwellings to be released at the time of the 5 yearly review if needed). However, we do not agree with the proposed quantum of development in each category or the selection of individual sites.<br><br>It is reiterated that the proposed SDLs contained within the WoE have not yet been tested at Examination and should therefore be viewed with some caution. It is possible that at Examination one or more of these SDLs could be found unsound, which would have significant repercussions for the Council's Housing Land Supply (HLS). Similarly, if the quantum of dwellings assumed to be delivered at these SDLs or in maximising the use of Brownfield land was over-estimated any subsequent reduction would have consequences for the Council's HLS.<br><br>Finally, the Council have identified 4 Urban Living Opportunity Areas where developments of high densities will be encouraged in appropriate locations such as those benefiting from good Public Transport connections. Wallace support this approach, however an increase in density should be applied with caution. Very little information has been made available by the Council as to how higher densities will be achieved, density should be appropriate to the area in which the development is located. The Council should not impose densities that are unacceptable to local communities and/or make no commercial sense to developers. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Laurence Parsons |
| **Comment ID** | 18822945/1491 |
| **Document Part Name** | Question 01 New Approach to Urban Living |

| | |
|---|---|
| **Comment** | **New Local Plan Consultation Questions and Responses**<br><br>1. What are your views on our intended Policy approach to achieving the Urban Living element of the Joint Spatial Plan (JSP) Strategy?<br><br>*(To help answer this question, see Section 2.26)*<br><br>The New Local Plan makes reference to the Strategic Development Locations but does not ask for Comment in this area. However, in order to have a joined-up approach, the SDLs must be considered in the NLP as the choice of location is a key element in the overall Strategy.<br><br>The decision to propose Charfield as a Strategic Development Location is in direct opposition to:<br><br>1. The Large Scale Development Strategy which aims to make "best use of Transport Corridors and existing and new services and facilities and employment opportunities" none of which Charfield will provide.<br>2. The Urban Living Element of the JSP, which aims to reduce high car use and make better use of underused urban areas, and<br>3. The SGC's own Climate Change Strategy, which looks to reduce carbon emissions by at least 80% by 2050 in order to meet its targets as part of the Climate Act 2008.<br><br>The Council needs to recognise that, in order to meet its other targets and provide a coherent Strategy, Charfield cannot be seen as a SDL purely because there is land available. The New Local Plan acknowledges that there are underused urban areas and should concentrate its efforts here, providing housing where it is needed rather than where it is easy but not sustainable.<br><br>Para 2.32 states that SGC want "to ensure that the aspirations that local people may have for their particular communities are incorporated into the development where possible." It has clearly been the case that the views of Charfield residents, collected during SGC Consultations, have been ignored, and that any Consultations have only been a tick-box exercise. If the exhibitions referred to in Paras 2.33 and 2.34 did obtain reaction and feedback, there has been no sign of it in the subsequent Plans. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | The Engine Common Trustees (ECT) |
| **Comment ID** | 19741409/1557 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | The notion of maximising housing delivery in existing urban areas has long been accepted as good practice. The concern, however, is whether too great an emphasis is being placed on this source of supply. In response to such opportunities, inevitably the type of housing is dominated by flats and small dwellings but doesn't provide a preferred choice for family based housing. A balanced assessment of such opportunities needs to accompany the overall capacity to achieve wider housing needs for the area. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | M. S. Howes |
| **Comment ID** | 19741377/1568 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | The notion of maximising housing delivery in existing urban areas has long been accepted as good practice. The concern, however, is whether too great an emphasis is being placed on this source of supply. In response to such opportunities, inevitably the type of housing is dominated by flats and small dwellings but doesn't provide a preferred choice for family based housing. A balanced assessment of such opportunities needs to accompany the overall capacity to achieve wider housing needs for the area. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Rockfield Farms Limited (RFL) |
| **Comment ID** | 20069217/1582 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | The notion of maximising housing delivery in existing urban areas has long been accepted as good practice. The concern, however, is whether too great an emphasis is being placed on this source of supply. In response to such opportunities, inevitably the type of housing is dominated by flats and small dwellings but doesn't provide a preferred choice for family based housing. A balanced assessment of such opportunities needs to accompany the overall capacity to achieve wider housing needs for the area. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Downend Estates Limited (DEL) |
| **Comment ID** | 1463137/1593 |
| **Document Part Name** | Question 01 New Approach to Urban Living |

| | |
|---|---|
| **Comment** | The notion of maximising housing delivery in existing urban areas has long been accepted as good practice. The concern, however, is whether too great an emphasis is being placed on this source of supply. In response to such opportunities, inevitably the type of housing is dominated by flats and small dwellings but doesn't provide a preferred choice for family based housing. A balanced assessment of such opportunities needs to accompany the overall capacity to achieve wider housing needs for the area. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hannah Saunders - Dodington Parish Council |
| **Comment ID** | 19931969/1605 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | **COMMENTS:**<br><br>With regard to the Planning Policies that were mentioned in Section 2.26 Members feel:-<br><br>o It is a VERY GOOD idea to prioritise areas which are capable of change by identifying Town Centre regeneration areas, etc…. but it must be controlled.<br><br>o It is VITALLY IMPORTANT that opportunities be identified for investment in Historic Assets, public realm, Green Spaces and urban tree stock…..<br><br>o When identifying key sites for change through redevelopment and reuse within and outside Town Centres……. the infrastructure MUST be considered and there MUST be sufficient job opportunities locally (particularly if employment areas are being changed to housing).<br><br>o It is ESSENTIAL that community services and facilities are delivered to support this potential development.<br><br>o AGREE that different Parking and Open Space Standards for parts of urban areas be adopted… as need to avoid over dense development as this could lead to social problems.<br><br>o It is VITAL & ESSENTIAL to explore Policy options and mechanisms to support this delivery and to make areas that encourage active and healthy lifestyles. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Taylor Wimpey |
| **Comment ID** | 20068353/1640 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | In principle we support the aim to maximise the use of Brownfield land within urban areas for residential, and employment, use. However, the new Local Plan merely restates the JSP level of provision from this source of 2,900 dwellings. Given Brownfield sites are often slower to deliver than Greenfield options and given the significant proportion of South Gloucestershire's supply that is suggested to have been delivered from this source, we request that the Council provide additional justification to demonstrate that there are sufficient genuinely deliverable sites within the existing urban areas to accommodate this level of development.<br><br>We note that the Council has provided a 'Review of Potential' for the Urban Localities provided as part of the Evidence Base to the current new Local Plan Consultation (Authored by Nash Partnership, November 2017). This Report states that its purpose is to review the capacity of Urban Localities to support the requisite growth that needs to be accommodated based on the Emerging JSP requirement. However, although this Report provides information about the demographic makeup of various localities and considers economic indicators (and other issues such as health and employment) in some detail the Review fails to properly consider where the Urban Localities actually have sufficient deliverable sites to meet the requirement. The approach taken has not properly considered potential development areas at a sufficiently fine-grained level and has not given sufficient analysis to the potential barriers to delivery of such sites.<br><br>At any point in time Brownfield land is a finite resource (albeit one that is refreshed over long term cycles) and without sufficient evidence setting out historic levels, and remaining sources, of supply we do not consider it a sound approach to assume more than double the number of units can be accommodated within Urban Areas than on Non-Strategic development sites within the rural areas.<br><br>While we broadly support the JSPs Urban Living Agenda (and understand that the new Local Plan is seeking conformity with this strategic Policy), the maximisation of housing development in urban areas should not prejudice existing employment provision or exacerbate the economic imbalance which gives rise to unsustainable commuting patterns. While higher densities are preferable these may not be deliverable (given the myriad of constraints which are unique to each site) or desirable to local communities in specific parts of South Gloucestershire. Urban living delivery targets must derive from a robust Evidence Base. For example, scheme viability is an important consideration which could have a consequential impact upon the identified development opportunities within urban areas and as a result, impact upon the deliverability of the JSP and associated new Local Plans. It is not clear from the existing Evidence Base supporting both the sub-regional and local policies that viability has properly been considered.<br><br>As identified above, we do not agree with the overall level of housing provision planned for within South Gloucestershire as it is based on the suppressed level of OAHN currently included within the Draft JSP. The JSP housing requirement has not yet been subject to Examination by an Independent Inspector and it is our view that the overwhelming evidence suggests that this level of housing delivery will need to be increased to prevent the suppressed provision of new homes stifling the growth aspirations of the region. Accordingly, the housing requirement to be planned for in the Emerging new Local Plan will also need to increase.<br><br>The proposed approach to supporting urban living as a source of new development is generally supported, albeit additional robust delivery information is required. This is necessary to demonstrate that the required housing supply can be accommodated, in a timely manner, on sites |

| | |
|---|---|
| | within the Urban Area to accommodate at least 2,900 dwellings over the Plan Period and potentially more given the JSP overall requirement should increase. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | E. H. Schubert Will Trust |
| **Comment ID** | 12403425/1668 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Dear Sirs,<br><br>DRAFT SOUTH GLOUCESTERSHIRE LOCAL PLAN CONSULTATION, FEBRUARY 2018<br><br>COMMENTS BY E. H. SCHUBERT WILL TRUST<br><br>In response to the Draft Consultation South Gloucestershire Local Plan Consultation Document, we present the following Comments. Please also see attached the Call for Sites Submission for Land at Villa Farm on Main Road in Aust – to which some Comments relate (A separate Call for Sites Submission has been made).<br><br>Question 1. What are your views on our intended Policy approach to achieving the urban living element of the Joint Spatial Plan (JSP)Strategy?<br><br>This Question (and others) ignores the approach presented in the four approaches to new development outlined at Paragraph 2.3 and expanded upon thereafter. There is an overwhelming need for new development to support pent up demand for housing, offer choice to relocate or grow to employers, and provide and sustain facilities and services to the population of South Gloucestershire.<br><br>The Strategy presented takes us a quarter of the way through the 21st Century but continues to ignore the wider requirements of local rural needs.<br><br>For Decades there has been concern over the pressure placed on sustaining rural services and facilities - shops, Post Offices, Doctor's Surgeries, Pubs, Schools, halls and meeting places have struggled to remain viable impacting significantly on the local populations that rely on them to meet social and economic needs.<br><br>With just 1,300 homes being delivered in South Gloucestershire's Rural Area (ignoring the proposed Buckover development), this is insufficient and particularly ineffective where it is delivered at locations outside of the Green Belt given that it is areas within the Green Belt that have seen development restricted by Green Belt Policy. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | G. E. Forward |
| **Comment ID** | 20176577/1707 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Who would fund this pipe dream?<br><br>Hanham Abbots has a wonderful urban living atmosphere, green spaces, a cricket pitch, assorted housing, shops, play areas. Why ruin it? |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David Jonathan Redgewell - Bus Users UK, Railfuture, Severnside |
| **Comment ID** | 20187233/1772 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Urban Living:<br><br>Question No. 1 - Urban Living:<br><br>Support this Policy but there is a need for a Master Plan for Cribbs Causeway as North BRISTOL City Centre Including the Regeneration of the Large Shed into an urban sense of place including urban public Releam.<br><br>New Bus and Coach Station at Cribbs Causeway Shopping Centre.<br><br>Railway station and opening of the Henbury Loop to Henbury and onwards to St. Andrews Road. |

| | |
|---|---|
| | Investment in MetroBus to Bristol Parkway and onwards UWE Bus rail Interchange at Patchway Including disabled Lifts, New Shelter CCTV and Car park.<br><br>Bus Interchange of Gypsy Patch Lane.<br><br>The Cribbs Causeway development needs Banks, Post Offices, Libraries and Public Toilets.<br><br>The Rail Link needs to expand to St. Andrews Road for Links to Severnside.<br><br>The site needs public squires street footway and Bus only MetroBus routes.<br><br>There needs to be more Affordable Housing Including part rent part buy and Tail building With a City Centre Type Locialsion.<br><br>Higher density must be built on this site.<br><br>Key Rail heads are Bristol Parkway, Filton Abbeywood, Patchway, and New Filton North, Henbury for Cribbs Causeway.<br><br>New Green Space and Parkland need crating and a New Bus Network.<br><br>Tourism need to including Wild Place and Aerospace Centre, Skating ring and New Arena. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tony Albon-Crouch - Marshfield Parish Council |
| **Comment ID** | 15617697/1875 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Dear ,<br><br>**South Gloucestershire Local Plan Consultation 2018 - 2036**<br><br>Please find below our Responses to the Local Plan Consultation:-<br><br>**Question 1. New Approach to Urban Living.**<br><br>The proposed Policy approach to concentrate on an 'urban living focus' is rational, but this must not mean that infrastructure resources are only targeted at those urban areas. For example, with particular regard to Public Transport, we have seen urban bus infrastructure upgraded so that bus times are digitally displayed at some urban bus stops, whilst at the same time services in the rural areas are withdrawn completely. The stated Policy aspiration should be that all services and infrastructure should be upgraded to the same basic level and rural areas and residents should not be left behind. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ian Beckey |
| **Comment ID** | 19952961/1891 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Page 31 - Question 1:<br><br>Severnside |

| | |
|---|---|
| | 2. Charfield, Buckover<br><br>With Housing Development in North Bristol at Cribbs Causeway Patchway New Town in Bristol, around Severn Beach, Severnside. More Employment Land needs developing around the Port.<br><br>Severn Beach Lacks a Hotel Development. Travelodge or Premier Inn to serve the village and Cabot Park.<br><br>Severn Beach is in need of regeneration and a small amount of Housing in Severn Beach and Pilning.<br><br>The Henbury Line needs extension to St. Andrews Road. To connect with the Bristol Severn Beach 30 minute Service Metro West.<br><br>Severn Beach is a Tourism and Walking Centre and South Gloucestershire need to Regeneration Strategy for the Seaside village seafront. It should not be a location for Hostels.<br><br>Which need to be sited in urban areas.<br><br>Public Transport Connection needs addressing.<br><br>Access to Pilning Station rebuilting with access disabled Lighting Footbridge shelters and car parks.<br><br>Severn Beach Station needs a Bus Interchange, platform Lengthening and car park and a full Henbury Loop/Severn Beach Line Service.<br><br>MetroBus Could extend from Cribbs Causeway but is not a replacement for a rail upgrade.<br><br>Support Charfield With New rail head for Bristol and Gloucester.<br><br>With Local Services Centre at Wotton Under Edge plus MetroBus extension through Buckover from Bristol through Thornbury along the A38.<br><br>Affordable Housing office development District Centre at Buckover public realm. Bus services, Schools and GP Medical Centre. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Bloor Homes (South West) |
| **Comment ID** | 20211105/1947 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Please find attached Representation. |
| **Attached documents** | Local Plan 2018-36 - Coalpit Heath.pdf (205 KB)<br>Appendix 1 - Part 4.pdf (6.0 MB)<br>Appendix 1 - Part 2.pdf (6.7 MB)<br>Appendix 1 - Part 1.pdf (11.3 MB)<br>Appendix 1 - Part 6.pdf (17.4 MB)<br>Appendix 2.pdf (453 KB)<br>Appendix 1 - Part 3.pdf (7.3 MB)<br>Appendix 1 - Part 5.pdf (6.4 MB) |

| | |
|---|---|
| **Respondent Name** | H2 Development Management (Land to Rear of Mount Pleasant Farm, Longwell Green) |
| **Comment ID** | 20377281/1962 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Please see the attached Document. |
| **Attached documents** | H2 Development Management - Tetlow King Planning (Sean Lewis).pdf (5.4 MB) |

| | |
|---|---|
| **Respondent Name** | JFG Gunnery |
| **Comment ID** | 19741793/1970 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Dear Sirs,<br><br>**DRAFT SOUTH GLOUCESTERSHIRE LOCAL PLAN CONSULTATION, FEBRUARY 2018**<br><br>**COMMENTS ON BEHALF OF JFB GUNNERY**<br><br>In response to the Draft Consultation South Gloucestershire Local Plan Consultation Document, we present the following Comments. Please also see attached the Call for Sites Submission for Land at Church Lane, Elberton to which some Comments relate (A separate Call for Sites Submission has been made).<br><br>**1. What are your views on our intended Policy approach to achieving the urban living element of the Joint Spatial Plan (JSP)Strategy?**<br><br>It is unfortunate that this question (and others) ignores the approach presented in the four approaches to new development outlined at Paragraph 2.3 and expanded upon thereafter. There is an overwhelming need for new development to support pent up demand for housing, offer choice to relocate or grow local employers and provide facilities and services to present and future residents of South Gloucestershire. Whilst urban living is one focus, it is notable in this Consultation Document that only passing reference is made to the opportunities that could arise from Self Build homes – and no reference made to a Self-build Home Policy.<br><br>The Consultation Document recognises that delivery models for a range of house types and tenures are required to meet housing needs to 2036. With the final housing figures some way from being confirmed following the JSP Examination this presents an opportunity for further consideration to be given to the benefits of Self-build homes in delivering a useful proportion of identified need. Small deliverable sites for Self-build should be planned for and allocated through the Local Plan as a positive approach to delivering such homes.<br><br>Such homes could be provided in rural locations that are not identified for non-strategic growth. It is notable that Appendix 2 of the Local Plan Consultation recognises that at certain villages and settlements with limited access to facilities, allocating 10 or more homes for non-strategic growth might raise issues of unsustainability. Therefore, allocations or Policies that support developments of up to, say, 10 new Self-build homes would be a positive step forward in supporting housing delivery. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Douglas Homes |
| **Comment ID** | 20120033/2009 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | **New Approach to Urban Living:**<br><br>The Local Plan's stated “New Approach to Urban Living” which seeks to make better use and maximise the use of Brownfield sites is supported. There are many sites within the Fringe areas of Bristol which offer the opportunity for redevelopment which will greatly benefit the surrounding area. The sites, being within built up areas, will generally be in sustainable locations, with good access to services and transport and their redevelopment will offer the opportunity to improve the environment of the site and the surrounding area and provide a good proportion of the housing requirement. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ellandi LLP and The Englander Group |
| **Comment ID** | 20119969/2016 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | **Part 2 - New Local Plan Strategy for Development:**<br><br>Our Comments in relation to Part 2 of the Consultation Document focus on the new approach to Urban Living which is underpinned by an objective to maximise the use of Brownfield land within urban areas for both residential and employment uses. This seeks to address, inter alia, the underperformance of the District’s High Streets and Town Centres, an over-reliance on the car and a continuing pressure on housing demand leading to high prices and affordability issues for local people (and therefore a significant need for new homes).<br><br>In practical terms, it is understood that this new approach could result in:<br><br>o More and higher density building around Town Centres, including higher buildings, building on “back land” and building above shops and offices;<br><br>o A greater mix of more retail, employment, services, homes and community uses in Town Centres;<br><br>o A greater variety of homes by introducing more flats and smaller homes, private rented and Affordable Homes to complement existing stock; |

| | |
|---|---|
| | o Redevelopment of underused land and buildings to enhance existing employment sites, as well as some Changes of Use from land which is currently safeguarded for businesses uses to mixed use or just residential use;<br><br>o Safeguarding, celebrating and repurposing Historic Assets; and<br><br>o Changes to public realm, green spaces, community services and facilities, parking and all forms of transport to cater for increased demand.<br><br>Question 1 – New Approach to Urban Living:<br><br>We support the intended Policy approach to achieving the Urban Living element of the Joint Spatial Plan (JSP) Strategy and note the contribution that Yate Town Centre can make to achieving this Policy objective (in particular more and higher density building around Town Centres, including higher buildings, building on "back land" and building above shops and offices). |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ellen Kenny - Siston Parish Council |
| **Comment ID** | 7853761/2024 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | **NEW LOCAL PLAN - MARCH 2018**<br><br>**Consultation on this replacement Local Plan will close on 30th April 2018 with this key Planning Policy Document then being used to determine all future non-strategic Planning for the whole of South Gloucestershire. The purpose of this Report though is to identify specific local issues, Policies and questions which it is felt we should respond to.**<br><br>**PAGE 31 Our Focus Going Forward – 'Identifying key sites for change through redevelopment and reuse …..... there could be better use of existing employment sites so that these would be redesignated for mixed use, new business premises and also homes. On some sites this may be total change from employment to homes.'**<br><br>**QUESTION 1:**<br><br>*Comment - In 2011, as a suggested response to the then Core Strategy, a single page Report was adopted by Full Council proposing the long established industrial/employment use designation at this Chapel Lane, Warmley site be available for review should any such proposition be forthcoming. This site was dependent on the neighbouring station and railways for so many Decades, but its more recent use, associated commercial vehicle movements and off-site parking needs bring daily conflict for so many local residents. A future opportunity to review such use should now be offered.*<br><br>***Recommend this Report be resubmitted.***<br><br>**Submitted by Cllr John Hunt in advance of the meeting of Siston Parish Council on Thursday 15th March 2018 providing relevant background information and recommendations for the consideration of those present on that occasion.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sebastian Loyn - YTL Developments (UK) Limited |
| **Comment ID** | 19779841/2075 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | **YTL Representations, SGC Local Plan 2018**<br><br>Dear South Gloucestershire Policy Team,<br><br>Please find below YTL's formal Response to your Local Plan 'Consultation Document' February 2018.<br><br>YTL in general welcomes SGC's approach to maximising the development potential of urban locations, delivering much needed housing for the Authority and surrounding areas. SGC's acknowledgment that some Policies will need to be reviewed and amended, to allow for the successful delivery of these areas is also supported by YTL. |

| | |
|---|---|
| | Within Section 2, YTL welcomes the identification of an additional 2,900 homes to be delivered within specific urban locations, one of these areas being identified as the Airfield. This additional housing requirement will also need to be supported through the JSP which currently identifies South Gloucestershire delivering 32,500 within the Plan Period.<br><br>YTL welcomes the identification of the Airfield within the 'North Fringe Cluster' and support the Council's acknowledgment that this site can deliver "a significant portion of the urban housing needs." YTL would like, where possible for this to be formalised through specific unit numbers/ allocation within the Local Plan to help ensure the appropriate Planning measures and delivery of such homes are identified in unison with the scheme currently being delivered. Any new Policy/approach will build on the existing vision for the site. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alex Atkinson - Edward Ware Homes (Land East of the A4174, Shortwood) |
| **Comment ID** | 19323937/2095 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Edward Ware Homes (Mr. Alex Atkinson) - Pegasus Group (Mr. Daniel Weaver).pdf (2.6 MB) |

| | |
|---|---|
| **Respondent Name** | Alex Atkinson - Edward Ware Homes (Land East of Coalpit Heath) |
| **Comment ID** | 20247169/2105 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Edward Ware Homes (Mr. Alex Atkinson) - Pegasus Group (Mr. Daniel Weaver).pdf (57.6 MB) |

| | |
|---|---|
| **Respondent Name** | Alex Atkinson - Edward Ware Homes (Land at Woodhouse Down, Almondsbury) |
| **Comment ID** | 20248001/2116 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Edward Ware Homes (Mr. Alex Atkinson) - Pegasus Group (Mr. Daniel Weaver).pdf (14.4 MB) |

| | |
|---|---|
| **Respondent Name** | Peter D. Box |
| **Comment ID** | 19453441/2155 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | **7.2 Urban Regeneration:**<br><br>One of the functions of the Green Belt Policy is to assist urban regeneration. This obviously covers the use of Brownfield sites. Each Council within the West of England region has created and does maintain a register of Brownfield sites. Figures from the latest records (end of 2017) reveal the following:<br><br>Please see the attached Document for the information which is referenced above.<br><br>It should be noted that the number of dwellings for each site is a **minimum.** Thus it is conceivable that, with a little imagination, the total number of housing units which could be constructed on Brownfield sites may be well in excess of the already large number of over 16 thousand recorded.<br><br>In addition to registers of Brownfield sites, registers are kept of unoccupied properties. Recently a figure of almost 3,000 within Gloucestershire and South Gloucestershire was published (Thornbury Gazette, Thursday November 30th 2017, Page 8). The corresponding figure for the City of Bristol is over 1,300. Whilst figures for the other two Councils are unknown, it is clear that there is, within the West of England, a significant pool of housing which could be brought into use.<br><br>**7.3 Dispersal:**<br><br>Major expenses in terms of finance, infrastructure provision and loss of productive countryside are associated with large developments on virgin land. All could be reduced or even avoided entirely if smaller, manageable developments were dispersed around already serviced areas. These could be the Brownfield sites mentioned above, or gaps and spaces as yet unused. |
| **Attached documents** | Peter D. Box.pdf (113 KB) |

| | |
|---|---|
| **Respondent Name** | Crest Strategic Projects & Crest Nicholson (South West) Limited |
| **Comment ID** | 20274273/2168 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | 1) The concept of urban living is supported and should be promoted as a means of maximising the efficiency of land; it is most likely to yield results in developments that have not yet started or are in early stages of development such as CPNN and Harry Stoke/East of Harry Stoke. The range of initiatives is supported in principle, but it remains the case as set out in our JSP Representations that the figure of 2,900 has not been properly tested. It represents an increase from the 1,300 homes expressed in the December 2016 Draft JSP that was not properly evidenced or explained in the December 2017 Consultation. Whilst an element of the urban living might sit within a 'large site urban windfall' pot, given that it must constitute development of 10 homes or more, the majority of the supply should be clearly identified through the SGLP via allocations.<br><br>2) AK supports the contention that the opportunity can only be realised by a shift in current SGC Development Plan Policy, particularly in respect of Parking and Open Space Standards. Achieving higher density schemes has been severely hampered by existing Public Open Space Policy; and where space is a constraint providing off site payments as mitigation is not a satisfactory response in achieving viable development. It is entirely right that standards could differ across the District as needs in the urban area (given access to existing facilities) is often entirely different to the rural areas. Higher density living is less likely to be attractive to families and this must be measured by the approach for example to providing for children's play. The ability to provide Policy compliant sports pitch provision will be near impossible, and onerous off site payments need to be measured against the vast array of sports available in the Bristol urban area. It is a missed opportunity not to have developed some ideas around POS provision and Consulted upon it at this stage of Plan preparation.<br><br>3) AK would also advocate an approach that shares ideas and Policies with its neighbour Bristol City Council. In the context of Open Space Standards, the current Policies are very different; it shouldn't be the case that Policies for new development in Patchway and Henbury should be entirely different. Of course the Northern and Eastern Fringes of Bristol are different to the City Centre, but that is the only obvious distinction. Given that the Nash work transcends LPA boundaries, it should be the case that consensus can be reached and unified Policies drafted. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Land at Bromley Heath Landowners |
| **Comment ID** | 20293793/2191 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | 1. The concept of urban living is supported and should be promoted as a means of maximising the efficiency of land; it is most likely to yield results in developments that have not yet started or are in early stages of development such as CPNN and Harry Stoke/East of Harry Stoke. The range of initiatives is supported in principle, but it remains the case as set out in our JSP Reps that the figure of 2,900 has not been properly tested. It represents an increase from the 1,300 homes expressed in the December 2016 Draft JSP that was not properly evidenced or explained in the December 2017 Consultation. Whilst an element of the urban living might sit within a 'large site urban windfall' pot, given that it must constitute development of 10 homes or more, the majority of the supply should be clearly identified through the SGLP via allocations.<br><br>2. If through the SGLP process it is not possible to identify a significant proportion of the 2,900 homes via clear allocations then consideration should be given to how certainty of delivery can be secured.<br><br>3. In respect specifically of the urban living opportunity areas, five urban edge locations have been identified for non-strategic growth which are located within 5 minutes walk of these urban living opportunity areas. In the interests of ensuring that growth in the urban edge locations is proportionate and the Plan Strategy is sufficiently flexible to deliver the housing requirement, a contingency for delivering the urban living allowance should be provided in urban edge locations. This would allow for suitable Greenfield/Green Belt sites to be delivered in the event that the urban living target is not achieved. This would be over and above what might be directed towards those locations via the non-strategic allowance. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Spitfire Bespoke Homes Ltd |
| **Comment ID** | 19738689/2198 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Dear Sir/Madam,<br><br>Representation to the South Gloucestershire New Local Plan: Consultation Document (February 2018), Submission of Land off Bristol Road, Winterbourne.<br><br>I am writing to provide the following Representation on behalf of Spitfire Bespoke Homes Ltd (hereafter referred to as Spitfire) to the South Gloucestershire new Local Plan: Consultation Document. Spitfire Bespoke Homes have an interest in Land off Bristol Road, Winterbourne.<br><br>The Representation specifically addresses approach to non-strategic housing growth (Question 3) and promotes the site for a future non-strategic housing allocation.<br><br>Spitfire is an award winning forward thinking, modern, privately-owned property development company specialising in the construction of sustainable, high-quality bespoke residential dwellings.<br><br>Passionate about design, sustainability and quality of construction, Spitfire have the skills, experience and creative flair to blend the latest trends in interior styles with practical modern day living. And because they are a niche house building company, they carefully consider each home as if it was their own.<br><br>Recognition for their design has come in the form of multiple awards; these include Residential Property Awards 2017 Winner and What House Awards 2016, Gold Winner. |

**Relevant National Policy:**

The National Planning Policy Framework is clear what the presumption in favour of sustainable development means for Plan-making:

o Local Planning Authorities should positively seek opportunities to meet the development needs of their area;

o Local Plans should meet Objectively Assessed Needs, with sufficient flexibility to adapt to rapid change, unless:

- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the Policies in this Framework taken as a whole; or specific Policies in this Framework indicate development should be restricted.

This means bringing forward sufficient land, of a suitable quality and in appropriate locations, in order to meet the expected needs for housing development. In preparing Plans, the LPA are required to 'boost significantly the supply of housing' (Paragraph 47).

To meet national Policy the Draft Local Plan and its Policies must meet the tests of soundness as defined by Paragraph 182 of the NPPF:

• Positively Prepared – The Plan should be prepared based on a Strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring Authorities where it is reasonable to do so and consistent with achieving sustainable development.

• Justified – The Plan should be the most appropriate Strategy, when considered against the reasonable alternatives, based on proportionate evidence;

• Effective – The Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

• Consistent with National Policy – The Plan should enable the delivery of sustainable development in accordance with the Policies in the Framework.

**Introduction:**

The recently submitted West of England Joint Spatial Plan once adopted will be a higher level Plan which acts as the driving force behind the preparation of the New South Gloucestershire Local Plan, which will respond to the changing needs and challenges of the District and allocate new sites for housing.

This Consultation is still at a relatively early stage and is seeking views on the approach for the future delivery of development.

The Joint Spatial Plan sets out the housing target across the four Authorities for the wider Bristol and Bath Housing Market Areas.

The Spatial Strategy identifies an overall supply of 105,500 new homes to enable flexibility across the four Authorities, with 32,500 of these to be provided in South Gloucestershire.

The Emerging Local Plan is proposing to meet this housing demand by the following Strategy:

• Completion of the planned developments in the existing Core Strategy.

• Maximising the use of Brownfield land.

• Strategic developments in five key locations.

• Non-strategic smaller scale development in rural areas.

The focus of this Representation is on the fourth bullet point – non-strategic smaller scale development in rural areas, where the Emerging Local Plan has identified a need for 1,300 new homes with a potential contingency of 500 homes if required – only to be released through the process of Plan Review where it can be demonstrated required delivery levels are not being met.

Given the above, there is clear scope for non-strategic (10 - 500 homes or 0.5-25ha) sites to come forward, in direct accordance with National Planning Policy which supports growth in smaller rural settlements as set out in Paragraph 55 which states;

"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby."

This position is also supported by the Rural Housing Section of the National Planning Policy Guidance which recognises that;

*"… All settlements can play a role in delivering sustainable development in rural areas – and so blanket Policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided."*

**Attached documents**

| | |
|---|---|
| **Respondent Name** | Strategic Land Partnerships/ Mr. S. Jarrett |
| **Comment ID** | 20312833/2205 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | 1) The concept of urban living is supported and should be promoted as a means of maximising the efficiency of land; it is most likely to yield results in developments that have not yet started or are in early stages of development such as CPNN and Harry Stoke/East of Harry Stoke. The range of initiatives is supported in principle, but it remains the case as set out in our JSP Reps that the figure of 2,900 has not been properly tested. It represents an increase from the 1,300 homes expressed in the December 2016 Draft JSP that was not properly evidenced or explained in the December 2017 Consultation. Whilst an element of the urban living might sit within a 'large site urban windfall' pot, given that it must constitute development of 10 homes or more, the majority of the supply should be clearly identified through the SGLP via allocations.<br><br>2) If through the SGLP process it is not possible to identify a significant proportion of the 2,900 homes via clear allocations then consideration should be given to how certainty of delivery can be secured.<br><br>3) In respect specifically of the urban living opportunity areas, five urban edge locations have been identified for non-strategic growth which are located within 5 minutes walk of these urban living opportunity areas. In the interests of ensuring that growth in the urban edge locations is proportionate and the Plan Strategy is sufficiently flexible to deliver the housing requirement, a contingency for delivering the urban living allowance should be provided in urban edge locations. This would allow for suitable Greenfield/Green Belt sites to be delivered in the event that the urban living target is not achieved. This would be over and above what might be directed towards those locations via the non-strategic allowance. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ashfield Land |
| **Comment ID** | 16658689/2271 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | 4.0 **THE EMERGING SPATIAL STRATEGY AND CONSIDERATION OF ALTERNATIVES:**<br><br>**Overall Approach:**<br><br>4.1 Map 2 entitled 'Proposed Spatial Strategy for South Gloucestershire' (Page 19 of the NLP Consultation Document) supposedly illustrates the Spatial Strategy that is being pursued as part of the Emerging NLP. An extract of this Map is shown below in Figure 1 for ease of reference.<br><br>4.2 In respect to NSDLs their distribution is yet to be determined and therefore the reference to this Diagram representing the SGC Spatial Strategy is misleading, given that the NLP's Consultation Questions clearly ask whether a range of Spatial Strategies should be pursued in respect to the potential distribution of NSDLs. This includes *'the use of land solely outside of the Green Belt; or land solely within the Green Belt; or a mix of land both within and outside the Green Belt.'*<br><br>Figure 1. Extract of the Spatial Strategy proposed in the NLP Consultation Documents<br><br>Please see the attached Document for Figure 1 which is referenced above.<br><br>4.3 We have raised concerns about the Spatial distribution of the SDLs in our Representations to the Emerging JSP and in separate NLP Representations, particularly in relation to the allocation of highly peripheral and inaccessible land at Buckover and Charfield. Putting aside those concerns we support a Spatial Strategy that considers the use of both sustainably located Green Belt land to assist in meeting the demand that is clearly evidenced as arising in the 'Greater Bristol' area; alongside the use of limited, smaller-scale non-Green Belt land on the edge of existing towns and villages to meet required need in the more rural peripheral fringes of SGC.<br><br>4.4 However, such support is predicated on a strong opinion that whilst the more rural and peripheral areas of SGC need to be considered as locations for small-scale housing development, the majority of housing numbers should be directed to accessible locations where access to everyday facilities and employment opportunities of a sufficient scale are available via multi-modal travel.<br><br>4.5 The majority of SGC's employment hubs and many facilities lie within the existing urban area of Bristol; therefore, it is logical that the majority of the most accessible areas will lie adjacent to this area, which are mostly within the Green Belt. This factor, considered alongside the evidence that clearly shows that demand for housing is greatest in the Bristol Urban Area (see our separate JSP Representations made in respect to Woodlands Golf Club) means that the optimal Spatial Strategy should focus the majority of new development in these locations, albeit with proportional growth at other accessible existing settlements that offer extensive employment opportunities, such as Thornbury and Yate.<br><br>4.6 Such an approach to the allocation of NSDLs would follow the general Spatial Strategy that the 2006 Core Strategy set outs. This was chosen because sites adjacent to the Bristol Urban area and Thornbury and Yate were considered to be the most sustainable locations for growth. In our view this conclusion remains valid today and there is no robust evidence to suggest that the NLP should deviate away from a similar distribution, in the way that the SDL proposals set out in the JSP do (for example, Buckover and Charfield).<br><br>4.7 Finally, we question why the NLP makes repeated and exclusive reference to 'rural' areas when discussing NSDLs. Many potential locations are not in rural areas, as they lie directly adjacent to large urban areas, such as Bristol, and it is these locations that development should be focused towards – not in more remote areas that could be considered to be rural by definition (such as Buckover).<br><br>8.0 **SPECIFIC RESPONSES TO QUESTIONS RAISED IN THE NLP CONSULTATION DOCUMENT:**<br><br>8.1 Although our Representations should be read as a whole, we have also prepared Responses as follows to the specific Questions that the NLP Consultation Documents pose. However, these should not be considered to be our full Response which is set out in preceding sections: |

| | |
|---|---|
| | ***Q1. New Approach to Urban Living:***<br><br>***1. What are your views on our intended Policy approach to achieving the urban living element of the Joint Spatial Plan (JSP) Strategy?***<br><br>8.2 We support the principle of the Council seeking to maximise delivery in existing urban centres by increasing the density of development in such areas, as well as seeking to regenerate inefficient commercial estates and underused areas of open space.<br><br>8.3 However, at the current time both the JSP and the NLP place too great an emphasis on this form of supply.<br><br>8.4 We consider that while more efficient use of existing urban land is to be encouraged, this will generally lead to the provision of more flats and smaller properties. In areas where this type of unit is in demand, and/or in areas where existing house types are fairly homogenous this will be very useful in diversifying existing housing stock. However the Council must carefully consider whether a 'one shoe fits all' approach is appropriate across all of the locations identified.<br><br>8.5 There is significant demand for family homes that meet lifetime homes standards; many families also seek garden space for young children. New build family homes are becoming more rare in Central Bristol as Policies seek to increase densities and provide for taller buildings in the central core of the city. This further restricts the supply of this housing type across the wider JSP area.<br><br>8.6 The Council also rightly refer to the need to provide a diverse portfolio of housing land that can deliver a range of house types and tenures in different ways, including affordable, open market, Self and Custom Build as well as Build to Rent. Focusing on urban renewal is also more complicated than Greenfield development, with land assembly and viability issues often leading to significant delays in delivery. In the context of SGC's ongoing failure to meet housing requirements since the adoption of the Core Strategy, along with the inability to identify a five-year housing land supply, the need to provide unconstrained land that can be developed quickly is particularly pressing and important.<br><br>8.7 At the curent time we consider that the Policy focus, particularly in the urban fringe areas, places too much emphasis on urban living as a source of housing supply. Our reasoning behind this is set out at Paragraphs 4.54 – 4.63 of these Representations.<br><br>8.8 In respect to both this Question and Questions 2.1 and 2.2, we must note that it is difficult to respond in full because the Evidence Base Document prepared by the Nash Partnership entitled *'Urban Localities Review of Potential: Supplementary Report – Prospectus and Delivery'* is not available. As this forms the only substantive Evidence Base Document relating to how the potential urban living yields have been derived from each of the localities chosen the Consultation process is flawed, as we are unable to properly consider and respond to this evidence. |
| **Attached documents** | Ashfield Land - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (30.0 MB) |

| | |
|---|---|
| **Respondent Name** | H2 Development Management (Land at Williams Close, Longwell Green) |
| **Comment ID** | 20376737/2300 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | *Local Plan Prospectus Document – Report of Engagement (February 2018):*<br><br>3.1 In response to Question 1 – relating to cross boundary strategic matters – housing was identified as one of the main topics. Within the feedback, the Report notes that *"Respondents felt it was important to consider and understand cross-boundary relationships with adjoining Authority areas relating to housing, including the supporting infrastructure associated with new housing"* (Paragraph 4.9).<br><br>3.2 The site at Williams Close would not require any new infrastructure provision as it already has this due to its sustainable location adjacent to the built-up area of Bristol. This includes expanding on the Affordable Housing provision provided by the nearby site adjacent to Mount Pleasant Farm as developed by Sovereign.<br><br>3.3 Sovereign's presence in the area is illustrated in the South Gloucestershire Urban Localities Review which identifies the wider Longwell Green site as one of the Registered Social Landlord sites (Appendix 3 of the Review). This presents a good opportunity to contribute towards meeting Bristol's acute Affordable Housing needs.<br><br>3.4 Another Response outlined in the Report *"Questioned the ability of Bristol City Council to deliver against its own housing requirement and, should this situation arise, the need for the other neighbouring Authorities to have to consider how they take this forward and apportion that need between them."*<br><br>3.5 Here, it is therefore important that both South Gloucestershire Council and Bristol City Council exercise their 'Duty' to Co-operate with each other within the preparation of their respective Local Plans, as required by Paragraph 178 of the NPPF.<br><br>3.6 In addition, the consideration of how neighbouring Authorities should consider how they accommodate housing needs arising from Bristol has been completely ignored by the Planning Officer's response to this question. At some points the Officer relies on the West of England JSP fulfilling this role, however it is also for each Local Plan to address how Bristol's housing need will be apportioned across each respective Local Authority area. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Fortannia Ltd |
| **Comment ID** | 19741217/2319 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | Dear Sirs, |

| | |
|---|---|
| | **DRAFT SOUTH GLOUCESTERSHIRE LOCAL PLAN CONSULTATION, FEBRUARY 2018**<br><br>**COMMENTS BY FORTANNIA LTD**<br><br>In response to the Draft Consultation South Gloucestershire Local Plan Consultation Document, we present the following Comments. Please also see attached the Call for Sites Submission for Land at Vattingstone Lane, Alveston – to which some Comments relate. (A separate Call for Sites Submission has been made).<br><br>***1. What are your views on our intended Policy approach to achieving the urban living element of the Joint Spatial Plan (JSP) Strategy?***<br><br>It is unfortunate that this Question (and others) ignores the approach presented in the four approaches to new development outlined at Paragraph 2.3 and expanded upon thereafter. There is an overwhelming need for new development to support pent up demand for housing, offer choice to relocate or grow local employers and provide facilities and services to present and future residents of South Gloucestershire.<br><br>The Strategy presented will guide development a third of the way through the 21st Century. However, as presented it continues with a Development Strategy that ignores the wider requirements of rural areas outside of both the main towns and North Bristol's urban area.<br><br>For Decades now, there has been concern over the decline in rural services and facilities. Shops, Post Offices, Doctor's Surgeries, Pubs, Schools, halls and meeting places struggle to remain viable or attract funding and investment leading to inequality and impacting significantly on the local populations that rely on them to meet social and economic needs. Policy initiatives have failed to stem decline. It is therefore essential for the Local Plan to have Policies that more than 'address' rural decline and inequality but 'solve' it – this is particularly relevant where the delivery of new homes can inject much needed spending capacity into a local area supporting its retention to sustain and encourage inward investment.<br><br>With just 1,300 homes (as it presently stands) being delivered in South Gloucestershire's Rural Area (ignoring the proposed Buckover settlement), this is insufficient and particularly ineffective where it is delivered at locations outside of the Green Belt given that it is areas within the Green Belt that have seen development and growth restricted in many ways by Green Belt Policy. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Redrow Homes South West, Julia Wallington, Debra Turner, Andrew Williams, Chr... |
| **Comment ID** | 20167105/2340 |
| **Document Part Name** | Question 01 New Approach to Urban Living |
| **Comment** | 8.2 We support the principle of the Council seeking to maximise delivery in existing urban centres by increasing the density of development in such areas as well as seeking to regenerate inefficient commercial estates and underused areas of open space.<br><br>8.3 However, at the current time both the JSP and the NLP place too great an emphasis on this form of supply.<br><br>8.4 We consider that while more efficient use of existing urban land is to be encouraged, this will generally lead to the provision of more flats and smaller properties. In areas where this type of unit is in demand, and/or in areas where existing house types are fairly homogenous this will be very useful in diversifying existing housing stock. However the Council must carefully consider whether a 'one shoe fits all' approach is apropriate across all of the locations identified.<br><br>8.5 There is significant demand for family homes that meet lifetime homes standards; many families also seek garden space for young children. New build family homes are becoming more rare in Central Bristol as Policies seek to increase densities and provide for taller buildings in the central core of the city. This further restricts the supply of this housing type across the wider JSP area.<br><br>8.6 The Council also rightly refer to the need to provide a diverse portfolio of housing land that can deliver a range of house types and tenures in different ways, including affordable, open market, Self and Custom Build as well as Build to Rent. Focusing on urban renewal is also more complicated than Greenfield development, with land assembly and viability issues often leading to significant delays in delivery. In the context of SGC's ongoing failure to meet housing requirements since the adoption of the Core Strategy, along with the inability to identify a five year housing land supply, the need to provide unconstrained land that can be developed quickly is particularly pressing and important.<br><br>8.7 At the curent time we consider that the Policy focus, particularly in the urban fringe areas, places too much emphasis on urban living as a source of housing supply. Our reasoning behind this is set out at Paragraphs 4.52 – 4.61 of these Representations.<br><br>8.8 In respect to both this Question and Questions 2.1 and 2.2, we must note that it is difficult to respond in full because the Evidence Base Document prepared by the Nash Partnership entitled 'Urban Localities Review of Potential: Supplementary Report – Prospectus and Delivery' is not available. As this forms the only substantive Evidence Base Document relating to how the potential urban living yields have been derived from each of the localities chosen, the Consultation process is flawed, as we are unable to properly consider and respond to this evidence. |
| **Attached documents** | Redrow Homes South West and Others - Grass Roots Planning (Mr. Matthew Kendrick).pdf (7.2 MB) |

| | |
|---|---|
| **Respondent Name** | Trefor Southwell |
| **Comment ID** | 16185185/3 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Emerson's Green/Science Park: |

| | |
|---|---|
| | The Ring Road is totally unusable during morning rush hour periods, it's not attractive to companies to move there while there is such bad access to the Motorway. Building the new M4 link will help but the Ring Road needs fixing. Removing the 2+ lane and the bus lane at the Hambrook lights would be a very good start.<br><br>Lack of parking in Lyde Green is already a major issue and only set to get worse due to poor parking when building new houses. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Damien McBraida |
| **Comment ID** | 3973217/5 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | The Road Network surrounding the Filton area is already completely overloaded at peak times. Those peak times now extend to around 4 hours every weekday evening during which time every major road in and out of Filton is almost gridlocked for a 2 mile radius in every direction. Current proposals for a massive increase in housing and employment on and around Filton Airfield with no appreciable increase in transport infrastructure appear totally unworkable in the light of the current already severe situation. Any large scale development in the "North Fringe cluster" including Filton Airfield will require a major increase in transport capacity to happen first. A major increase in both road and rail access and capacity in the area are clearly required but I see no signs of any improvements being considered. Even proposals to utilise the existing local railway infrastructure to re-open a circular passenger loop line around North Bristol (the so called Henbury Loop line) have been repeatedly rejected by the Authorities even though this could serve the proposed development. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tim Keen - North Bristol Trust |
| **Comment ID** | 19118785/6 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | There needs to be consideration of the increased population's Health Service access requirements and what investment is required and what the funding sources are - primarily for Primary and Community Health Services. Access to existing secondary and tertiary health care services needs consideration, in particular access via Public Transport as their available capacity for parking is already strained. This means planning Public Transport routes from these new communities directly to the main acute Hospitals to ensure patients, visitors and staff have reliable travel options other than by car.<br><br>There should be consideration of the healthy new towns initiative and what can be learned from that programme to support development in South Gloucestershire that is designed to enhance health and wellbeing. Whilst the population of South Gloucestershire may have generally good health and above average life expectancy, there has been rising demand on urgent care services over and above that which can be explained by demographics. |
| **Attached documents** | Drivers of nonelective activity at North Bristol Trust.pdf (123 KB) |

| | |
|---|---|
| **Respondent Name** | Chris Stow |
| **Comment ID** | 877825/8 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | I feel that transport issues should be the main consideration within these localities because current congestion is already a concern. Perhaps larger employers, within these localities, could provide a bespoke bus service for their employees if practicable. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Lynne Goldsack-Rowland |
| **Comment ID** | 12185665/16 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | "Existing road space could be reallocated for other forms of sustainable transport" is not a solution. This has already been done in Patchway and causes additional miles to be driven with the consequent negative effect on air quality. Similarly reducing residential parking does not stop people using cars but leads to conflict. There needs to be a complete rethink in the road layout of the North Fringe. Current solutions are not working and residents are trapped in or out of their homes for many hours at peak times. Ideally through-traffic and work traffic should be diverted away from residential areas. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Daniel Summers |
| **Comment ID** | 19200225/21 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |

| | |
|---|---|
| **Comment** | I have particular concerns with regard to the proposals to decrease residents' parking and reallocate existing road space. The logic of decreasing available parking for residents was tried in the early 2000's under the Prescott proposals with the theory being that, if less parking is provided, people will buy less cars. This turned out to be totally wrong, it simply means that streets are littered with cars causing aggravation between residents, difficulty for people pushing prams where people park on the pavement and difficult access for Emergency Service vehicles. From a practical point of view it simply does not work, and, from an ideological perspective, the state should not be forcibly making people's lives more difficult.<br><br>It is absolutely right to promote more sustainable forms of transport and make life easier for those who wish to walk or cycle and I absolutely applaud designing cycle paths and such into future Development Plans but this absolutely should not be at the expense of those who need to get to work by car, or travel to other areas by car. As a further point, new developments give the opportunity to create separated cycle paths, rather than forcing cyclists to co-exist on roads which is dangerous and not at all good for the environment with the extra fuel use and emissions caused through cars struggling to get around cyclists. As a Local Authority, it is your duty to serve people's wants and needs, not dictate to them.<br><br>Similarly, proposals to reallocate existing road space appears to be frankly idiotic when considering the level of congestion in the North Bristol Fringe in peak hours at present. By building new housing, therefore bringing more people who need to commute in peak hours, this problem only gets worse. A plan to reduce road space available is, again, not serving the needs of the community and is in fact making life more difficult for an ever growing number of residents. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Stella Beecher |
| **Comment ID** | 19274081/27 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | 2.1 The Opportunities:<br><br>The S Glos Local Plan should concentrate on enhancing the quality of life of existing residents by delivering sustainable living in urban centres, with an emphasis on its rural environment and historic origins.<br><br>Relevant Policy:-<br><br>NPPF 23 *retain and enhance existing markets, and where appropriate, re-introduce or create new ones.*<br><br>I do not think that Yate can be described as having the major asset of being in proximity to the Bristol and Bath Science Park, it is approx 11 miles away. The time taken to travel this distance by Public Transport such as a bus is so long that people use their cars.<br><br>The Challenges:<br><br>It is not possible to develop Yate in a sustainable manner, as the huge city of Bristol dominates the whole of the South Gloucestershire area.<br><br>As Yate has no Hospital, and there is the lure of countless huge retail centres such as The Mall and entertainment venues scattered around a fifteen mile radius, and employment centres elsewhere, means that traffic congestion will inevitably increase. An urban centre such as Yate will continue to be a commuter town, and potentially by 2036 the town will have an even increased total of people who are commuting.<br><br>The South Glos Council 2011 Census analysis for Chipping Sodbury, Yate Central and Yate North includes the total percentages of people in employment who travel to work by driving, or as a passenger, in a car or van . The percentage of employees using this method of travel for Chipping Sodbury is 76.9%, for Yate Central it is 71.9% and for Yate North it is 77.2 %.<br><br>http://www.southglos.gov.uk/council-and-democracy/census/census-2011/<br><br>Policies which will lead to strenuous efforts to solve this vehicle usage problem are needed within the currently existing Yate and Chipping Sodbury urban centre.<br><br>2.2 Potential sites which I consider are suitable for sustainable development are the areas of Almondsbury and Easter Compton as they are adjacent to Bristol. There is a low probability risk of flooding in these areas as shown on the UK Govt website.<br><br>https://flood-map-for-planning.service.gov.uk/<br><br>Flood Zone 1 Almondsbury. Land and property in Flood Zone 1 have a low probability of flooding. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Robert Lomas - Iron Acton Parish Council |
| **Comment ID** | 15473953/33 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Yate: I welcome the commitment to a whole town approach. However it has to be admitted that so far Yate has developed in a series of uncoordinated add ons. How will Planners be able to "take charge" of a whole town approach in the current Planning environment to avoid another set of add ons?<br><br>Yate has developed to be a mainly Dormitory Town with inadequate links to other areas. For the foreseeable future a high percentage of residents will travel to other locations for employment or leisure. While many travel in for employment from other areas. The Document has a wish list stating there is potential to improve Public rTansport, but does not suggest how. Except that is, to suggest a connection to the MetroBus and improved rail services. Before the development of more homes takes place this wish must be planned for with identified funding provision.<br><br>As with all transport issues, once people feel compelled to use the private car they are very unlikely to view Public Transport as a usable alternative unless it is very convenient, inexpensive and comfortable. Once you buy a car you are going to use it even if the bus runs past your home every half hour. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kate Kelliher |
| **Comment ID** | 6031873/45 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | The local community needs to be properly engaged with the Consultation process.  Not just landowners and developers. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Martin Swinburne |
| **Comment ID** | 10327617/51 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Regarding Yate I have three Comments.<br><br>a) The railway station is indeed a major asset for Yate. However my experience is that the trains into and out of Bristol are running at maximum capacity at peak times. The 17.41 from Bristol Temple Meads to Yate is typical - a five carriage train with every seat taken, lots of standing passengers and very little space to accommodate more. My understanding is that running more local trains at peak times is not possible because they then start to impact upon the Bristol - Birmingham express trains. If the station and the line are to be upgraded to allow for the passing of faster trains, then this needs to be done before any further large development in Yate. Therefore the plans for Yate should be dependent upon the Network Rail plans for upgrading the line.<br><br>b) As the proposed MetroBus route into Yate will come along Badminton Road, it seems to me logical to focus new housing along that route. Putting houses anywhere else in Yate will push people into car use. I didn't see that mentioned explicitly anywhere.<br><br>c) Further development of Yate's retail space should take into acount the technological shift of retailing online. I don't see the trend away from High Street retailing changing in the next 20 years. There are already a number of empty retail units in Yate. Therefore a more pertinent question is how to preserve Yate's Retail Centre when there is a shift away from High Street retailing. I welcome the proposal to improve and increase the car parking to make the existing retailers more accessible. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Miles Morgan |
| **Comment ID** | 3552513/71 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | With regards to Yate, if development is unavoidable It would make sense to me to prioritise development as near as is practical to the new Metro Hub and the railway station near Badminton Road. The land behind the new Council Offices down to the River Frome and to the South of Nibley Lane down to the river is not very good agricultural land and is not very pretty. There are a line of ugly pylons in this area. This would be a sustainable location.<br><br>At the moment there is no Right of Way along the river bank between the fields near to the railway bridge at the Iron Acton end of Nibley Lane and Nibley Village near Badminton Road. Walkers using the Frome Valley Walkway from Iron Acton have to leave the river bank and proceed along the dangerous narrow Nibley Lane towards Nibley Village. |

| | |
|---|---|
| | As part of future development the flat fields along the river bank in this area could be opened up for public access as part of a wider development of the higher land. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mr. Hawthorn |
| **Comment ID** | 14671265/77 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Hanham - I agree that it retains a sense of village character and this should be preserved rather than jeopardised by ill-conceived and inappropriate development on the surrounding open spaces. Transport into the Centre of Bristol is already a problem and will only become worse as a result of further residential development.<br><br>Protection of the area's open spaces is vital. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mayers |
| **Comment ID** | 16271713/90 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | The Science Park would be a goood area to build near, avoiding the over-development of the countryside and green field areas. The Filton Airfield would also be able to hold many houses and thus creating a large chunk of the housing needed, However as also with these new areas the road infrastructure can't cope at rush hour due to the amount of people living in the area. Roads should be key when building new developments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Claire Normoyle |
| **Comment ID** | 7883105/108 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | No Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tamzen Bury |
| **Comment ID** | 19416385/115 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | For Hanham:<br><br>Challenges are as follows:<br><br>TRAFFIC CONGESTION - The increase in traffic in the village will mean congestion in the areas where the roads are narrow e.g. going past the Elm Tree on Abbots Road, or along Memorial Road at places where residents have to park on both sides of the road, due to lack of parking that came with the houses. The road width does not allow for more than one car to pass through at a time, and often there is a build up of traffic waiting to get through. The village of Hanham is not set up for further increase in population.<br><br>INCREASE IN COMMUTE TIME - The increase in volume of traffic will be frustrating, and will also greatly increase the commute time into Bristol or Bath, due to the large number of residences being proposed for Hanham. Currently it already takes me around an  on the number  to get into the Centre of Bristol, or it costs me £14 to park in town with a 50 minute drive whether I go along Crews Hole, or Hanham High Street, or go out to the Brislington Park and Ride.<br><br>TRANSPORT - Unless a Park and Ride near the Longwell Green or Hanham area is built, or a big increase in frequency of the buses, there will not be enough Public Transport to get people to work, or teenagers to College if the population increases dramatically in Hanham.<br><br>CAR PARKS IN HANHAM - There is already a lack of parking near Hanham High Street and near the Hanham Common shops. I often have to queue for a space in the Laburnam Road car park off the High Street, or drive round the block until a space becomes free by the Common shops. The village of Hanham has already had a massive increase in population over the last few years (John Chiddy Close and the Hanham Hall/Roman Way area), and can not cope with any more residents. |

| | |
|---|---|
| | AMENITIES - The Doctors, Dentist and Schools are already full in Hanham, which needs to be considered with the number of new residences being proposed. The lack of School places available plus the fact that Hanham Woods is in special measures, is likely to mean that families with children would not be keen to move to the area. There are not enough amenities to cope with any more increase in population in Hanham.<br><br>IMPACT ON WILDLIFE - I live in and often have bats flying over our garden, have squirrels in the trees, mice and vowls live in the field over the back of us, and there is a badger set close by.<br><br>IMPACT ON THE RESIDENTS - In a group of Junior School aged children often cycle their bikes around and play by the roadside, as it is so quiet in our road. People have paid a premium to live in a house and road that they thought would be for life. Also a lot of elderly people live in the road and walk their dogs in the field off . These elderly would not be stable enough to walk their dogs in the woods instead. The proposal to build a large number of houses on the field off the back of is causing the residents a lot of distress. It would be a complete repurpose of the road and have a large impact on the resident's way of life due to the amount of traffic that would be driving through the Estate via and Castle Farm Road onto Abbots Road. I already have to queue in the morning to pull out of at the exit due to the traffic on Abbots Road at 7.30am. There would be a massive queue every morning if more houses were built at this end of Hanham, as the roads and exit routes are not big enough to cope with any more traffic. It's bad enough as it is! |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anne Gale |
| **Comment ID** | 16344321/120 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | They are terrible. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Thompson |
| **Comment ID** | 17795873/161 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | No. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Philip Box |
| **Comment ID** | 19453025/192 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | **Patchway or Northern Fringe Cluster:**<br><br>There is no mention of preserving and enhancing natural infrastructure or capital in association with this future development area. Although the site is clearly "Brownfield," this does not exclude the imperative to preserve existing, or create new and genuinely beneficial, wildlife habitats. This is important given the Government's current proposals to introduce the principle of "net gain for nature" in housing developments. This itself follows from ongoing efforts to tackle sharp decline in the UK's Biodiversity - also reflected in the UK's Biodiversity Action Plan following on from the UN Convention on Biodiversity Obligations - and ensure the greater integration of natural infrastructure concerns to the Planning System. As such, this should be reflected more in the core principles for development in this area.<br><br>The mention of "high-quality housing" fails to define this term in relation to environmental harms or benefits, in line with the "net gain for nature" principle currently inbound. For this development to be "future proof" and genuinely sustainable, the impact on Biodiversity must be more clearly outlined.<br><br>**Science Park/Emersons Green:**<br><br>Given the location of the Science Park expansion near the Green Belt, and the advance of housing development onto former agricultural land, the impacts on Biodiversity and nature in the area should be more clearly outlined. The impacts of the development on the nature of the area are not mentioned, nor are any provisions to ensure that damage is either mitigated or compensated for. Likewise no mention of the "net gain for nature" principle, or "high-quality housing" in relation to green infrastructure. Consideration of these principles should be clearly outlined from the offset, and not form part of subsidiary Planning Submissions, given the sensitivity and former use of the location. Likewise this is important given the likely impact of any substantial development on pre-existing wildlife in the area. If these principles are not clearly included, it would be a negation of national commitments to enhance and preserve Biodiversity, in line with the national Biodiversity Action Plan, and soon to be introduced principle of "net gain for nature" in new developments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Carolyn Baker |

| | |
|---|---|
| **Comment ID** | 17252193/204 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Staple Hill has the potential to be a very pleasant urban area however it is currently disadvantaged by its retail outlets, lack of parking and congestion on its roads leading to slow transport links and pollution. Every effort should be made to improve these and to make the most of the green spaces.<br><br>Yate has already seen a huge amount of housing development with no improved road or rail infrastructure to cope with it resulting in congestion and reduced air quality. The road structure around the Shopping Precinct does not encourage easy flow of through traffic resulting in long queues. Its green spaces must be preserved and attention paid to improving transport facilities. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Peter D. Box |
| **Comment ID** | 19453441/219 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | The JSP was based on an unsubstantiated projection of housing requirements made *circa* 2014. Significantly this was before the UK Referendum on membership of the European Union and hence while the UK was subject to EU laws on Freedom of Movement. Leaving the EU will, in all probability, lead to less immigration into the UK from EU countries and this could be reflected in a lower than projected housing requirement.<br><br>The JSP uses the Strategic Housing Market Assessment (SHMA) as a basis for its forecast to derive an Objectively Assessed Need (OAN) of 97,600 dwellings. The planned build of the JSP is for 105,500 units giving a contingency allowance of 8%. Of the JSP total, 32,500 units were allocated to SG but as the SHMA was prepared on a local Council basis, the figure for SG is available, and gives a corresponding OAN of 24,000. The contingency allowance is therefore an eye-watering 35%. A fairer revision of the figures is called for.<br><br>The JSP Document identified the three major urban sites within the West of England area as Bristol (pop. 617,280), Bath (pop. 94,782) and Weston-Super-Mare (pop. 84,452). These three form a shallow isosceles triangle with an East - West base of about 50 kilometres (30 miles).<br><br>Considering the employment for the rising population of the area, the JSP identified several Enterprise Zones and Business Parks, all of which were sensibly within or adjacent to, the Bris - Bath - W-S-M triangle: **i.e. they were nowhere near the major developments proposed for Thornbury, Charfield and Buckover.** Proceeding with these developments is therefore an unsound Policy which should be abandoned forthwith. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Gillian Sanders - Wessex Water |
| **Comment ID** | 19455361/229 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | We note the areas identified as having potential to accommodate a new approach to urban living which seeks to intensify development in a sustainable manner. Wessex Water will continue to work with the Council and other Stakeholders to consider the impact of additional development upon existing and planned sewerage infrastructure. We will continue to support development which promotes sustainable use of water for the benefit of the community and environment. Water efficient development will reduce demands on the environment in terms of water resource and treatment. Rainwater run off from new development must be returned to watercourse via the use of innovative Sustainable Drainage Systems (SuDS) including green roofs, rain gardens, swales and ponds. SuDS can reduce Flood Risk and provide additional ecological and amenity benefits.<br><br>The “Key Sites for change” will need to embrace SuDS to enable classification as “exemplar urban living development.” We will welcome discussions on the potential to improve existing rainwater run off arrangements at:<br><br>• Douglas Road and Lucas Works, Kingswood<br>• Kleeneze Site, Hanham<br>• Station Road Yate<br><br>We welcome the approach stated in The North Fringe Cluster that existing road space could be re-allocated for other forms of sustainable transport and other uses such as green infrastructure. We welcome the approach to introduce new cycleways and highway trees and suggest that these areas also include water sensitive urban design as new multi-functional open space can help to integrate new developments within existing area. We welcome the approach to reduce residential car parking on some developments in recognition of the good Public Transport and walking and cycling opportunities available. We suggest that these approaches could be adopted throughout the South Gloucestershire area.<br><br>We welcome the approach stated in The Science Park and Emersons Green area to increase Public Transport, cycling and walking connections with existing communities in the East Fringe, Downend, Staple Hill and Kingswood, from the Science Park, to improve the life chances of local people, reduce inequalities and reduce reliance on private cars. |

| | |
|---|---|
| | We welcome the approach stated in the East Fringe Urban Centres to improve green infrastructure links from the focal point of Page Park along the High Street through an enhanced network of street trees and suggest that this is expanded to include connections to existing and new cyclepaths to Central Bristol and the Bristol Bath Science Park.<br><br>We welcome the "whole town" approach to the regeneration and development of Yate and the potential benefits of the "whole sub catchment" approach via the Bristol Frome Improvement Project. We believe that a significant opportunity exists to link development within the area to the emerging Partnership Project currently being developed in the Bristol Frome (mentioned above). |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Helen Johnstone - Stroud District Council |
| **Comment ID** | 14317537/249 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | 1. Yate functions as an employment, shopping and Public Transport hub, including the mainline rail connection to Bristol, for a wide area including rural settlements in the Southern part of Stroud District. Opportunities and challenges for Yate should include identifying and maximising opportunities for linkages with rural communities, including those within Stroud District and integrating with wider cycling/ walking networks.<br>2. Stroud District Council would welcome the opportunity to work with South Gloucestershire Council to explore these opportunities and challenges as the Plan is developed. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ann O'Driscoll - North Bristol SusCom Ltd |
| **Comment ID** | 5846881/267 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | North Bristol SusCom produced an updated Group Travel Plan in October 2017. In the Plan we highlighted a number of issues in the area that need to be addressed. We attach those pages from our Group Travel Plan for info here.<br><br>Our main Comments on the opportunities and challenges identified for the Localities are around ensuring that residents and employees are enabled to travel and commute by sustainable transport. It is important that people have choices on how and when to travel if we are going to reduce car use/dominance and congestion in the area. We want to see #GrowthWithoutGridlock.<br><br>**North Fringe Cluster -**<br><br>• Railways stations - Improvements need to be made at the existing railway stations in the area (Parkway, Abbey Wood and Patchway) to enable them to be the multi-modal Transport Hubs they should be. Better integration with the bus network is required. Pedestrian and cycle access to Parkway Station under the Brierly Furlong Bridge needs to be addressed - this is a longstanding barrier that makes access to Parkway very unsafe for pedestrians and cyclists. MetroBus also needs to be accommodated at Parkway Station as soon as possible.<br>• Bus Network - Many buses in the North Fringe operate a very circuitous route and take a long time to get from A to B. This needs reviewing and gaps need to be filled to enable people to travel around the area more quickly and efficiently by Public Transport.<br>• Cycle & Walking Infrastructure - We would like to see segregated cycling infrastructure put in place - cycling superhighways - to protect cyclists from road traffic and also make walking more enjoyable.<br>• Permeability - Often times cycling and walking routes are alongside the busy A4174 Corridor or along the back of buildings etc. Need to ensure cycling and walking is in a pleasant environment, direct, safe, well lit, animated and ideally segregated etc.<br>• Cars - We need to reduce the need for people to travel short distances around the area by car. We need to enable travel by bus, train, cycling, walking, mobility scooter etc. We need to support car sharing, car clubs, electric vehicles so that when people do have to use their car they do so more sustainably and less often.<br><br>**The Science Park and Emersons Green:**<br><br>For such a major and growing employment area the provision of sustainable transport infrastructure is poor. Improvements are on the way with MetroBus M3 route and the cycling route to Yate but more needs to be done to connect wider areas to the employment opportunities at Emersons Green. Pavement Parking in some employment areas is very bad (Folly Brook Road) and impacts on pedestrians and cyclists. Road restrictions and enforcement can help but people also need alternative ways to get to/from work.<br><br>**East Fringe Urban Centres:**<br><br>These locations need better sustainable transport connectivity not just to the City Centre of Bristol but to the major employment areas of Emersons Green, Yate, Cribbs/Filton. In some instances it can be almost quicker to walk from Kingswood to the Science Park than to catch a bus - that needs to change.<br><br>**Yate:** |

| | |
|---|---|
| | We would like to see Yate Station developed as part of the MetroWest Phase 2 project which will increase frequency of services and access and welcome any improved Public Transport connections along the Badminton Road Corridor and to the Bristol & Bath Science park and other major employment locations. |
| **Attached documents** | Area Issues and Opportunities - NBSC Group Travel Plan 2017 - 2020.pdf (210 KB) |

| | |
|---|---|
| **Respondent Name** | Emma Jarvis |
| **Comment ID** | 2745345/279 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | The development locations show that the Plan is over reliant on the A38 Transport Corridor for the period up to 2036 which is in danger of becoming overly congested, leading to longer journey times and more pollution for most. It is too much development alongside one route at once, the transport implications for the Bristol area could be dire.<br><br>There are few strategies to alleviate pressure on the A38 and no new roads or bypasses to supplement it when it grinds to a halt. Residential roads and country lanes are at increasing risk of becoming rat runs. An increased number of lorries, delivery vehicles, construction trucks etc will still be on the roads, they cannot decant to a MetroBus. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Lesley Brown |
| **Comment ID** | 16384673/286 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | YATE.<br><br>There are already huge numbers of housing proposed surrounding Yate as Strategic Development Locations. To add even more housing would not be tolerable due to lack of infrastructure especially health facilities. Currently the transport system is unreliable. lives in and bus was recently cancelled with another one not due for 40 minutes. This is not an unusual occurance. The Minor Injuries Unit struggles to cope with the existing population and sometimes has to close. Our local General Hospital at Frenchay was closed and Departments transferred to Southmead in Bristol with the loss of hundreds of beds. The promised recuperation beds that had been promised at Frenchay now look in doubt. Further development is not feasible. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Hicks - Falfield Action Group |
| **Comment ID** | 16618369/299 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | The level of development proposed in the North Fringe Cluster brings with it the very real risk of significantly increased congestion of the A38, which is a key transport route in and out of Central Bristol. The impact on the A38 is not limited to the stretch South of the M4/M5 Interchange as the proposal for Thornbury to Buckover will increase traffic and congestion on the A38. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sarah Blackmore |
| **Comment ID** | 16193889/306 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | As the Consultation itself recognises 'Bristol City Centre will continue as the primary focus of the Greater Bristol urban area.' Better transport links from these areas into Central Bristol will be very important. In particular the infrequent, unreliable & lengthy bus service from Yate to Bristol should be addressed. It is vital to ensure that the necessary infrastructure is in place in the areas that are developed e.g. School places, GP Surgeries & transport links. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sarah Blackmore - VALID Action Group |
| **Comment ID** | 19467105/319 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | As the Consultation itself recognises 'Bristol City Centre will continue as the primary focus of the Greater Bristol urban area.' Better transport links from these areas into Central Bristol will be very important. In particular the infrequent, unreliable & lengthy bus service from Yate to Bristol should be addressed. It is vital to ensure that the necessary infrastructure is in place in the areas that are developed e.g. School places, GP Surgeries & transport links. |

| | |
|---|---|
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Claire Young |
| **Comment ID** | 916289/334 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | There appears to be a lack of reciprocity between the identified challenges and opportunities for the different locations. For example, the section on the Science Park and Emerson's Green talks about a "Review of opportunities for small scale businesses/start-ups at the Science Park and/or in nearby locations (e.g. Yate, Kingswood and Staple Hill)" but this isn't reflected in the Yate section. Similarly although the section on the Science Park refers to transport links from “existing communities in the East Fringe, Downend, Staple Hill and Kingswood, from the Science Park,” the Staple Hill section refers to it being “well located and connected in relation to accessing the Enterprise Area at the Bristol and Bath Science Park” with no mention of the need to improve transport links and there is no reference to transport links to the Science Park in the Hanham section. The motivation may be to avoid duplication but the result is that the Plan doesn't seem joined up.<br><br>In the Yate section:<br><br>• I welcome the references to regenerating the “Western Gateway” to Yate. Plans for this area should include a redeveloped railway station, providing upgraded passenger facilities, the capacity for more frequent services and a multi-modal Interchange linking rail and bus services and providing car and bike parking.<br>• If Yate is to continue to provide the “lifestyle offered by a free-standing town in a rural setting” it needs to retain that status. I made my objections to the JSP SDL proposals clear in my Response to that Consultation. However, it is worth repeating here that Yate should remain distinct from the communities in the surrounding rural area, and they from it. That is threatened by the loss of Green Belt involved in the SDLs.<br>• Yate serves an important role for the surrounding villages as a centre for employment, retail and leisure. That needs to be taken into account when considering the requirements for services and transport infrastructure but this section seems to focus only on what is required within the town or to link it to other major centres.<br>• More detail is needed on how “issues of traffic movement within and through the town“ will be addressed. Improved Public Transport to other major centres will only be used by people if they can get to it easily from their home.<br>• As I said in my JSP Consultation Response, there are too many constraints on the A432 Corridor to deliver segregated cycling and Public Transport lanes. An alternative approach is needed to extending the MetroBus to Yate if the service is to be fast and reliable.<br>• More detail is needed of how the new “Yate” SDL, which is actually in two of the neighbouring rural Parishes, will link with the “Western Gateway” area and the rest of the town. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Caroline Brewser |
| **Comment ID** | 10284257/353 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Yate is a hub, providing facilities for people from many local villages (including some of the villages around Thornbury, which does not have as many facilities as Yate, especially the Minor Injuries Unit, but also the range of shops and services). Please recognise that people from nearby villages and rural communities need to be able to travel to and from Yate quickly and easily (e.g. after collecting children from School, or during their lunch hour, or in the evening). Do not reduce or remove car parking unless regular, affordable Public Transport to Yate is provided from more locations, or else a usable Park and Ride scheme is in place. As  of , I travel by car rather than bus not because I particularly want to use a car but because the bus service is infrequent, slow and does not take me to the places in South Gloucestershire that I want to reach at the time I need to travel. For instance, the bus from Tockington to Yate takes an hour (compared with 20 minutes to drive), and only runs every 90 minutes between 09.15 and 16.45. Travelling to Yate on the bus for an after School appointment just isn't an option. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tristan Clark |
| **Comment ID** | 19194177/356 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | The Consultation Document claims that the Bristol & Bath Science Park at Emerson's Green ‘will increasingly have a role in providing employment opportunities in South Gloucestershire, including the residents of the new ‘Strategic Development Locations’ at Coalpit Heath and Yate’ (P. 37). Given that the JSP proposes to build roughly 1,800 homes at Coalpit Heath and at least 2,000 homes at “Yate” (i.e. Iron Acton) this is a gross misrepresentation of employment potential. When the Science Park was opened it was predicted to eventually yield 6,000 jobs. The new residents of Coalpit Heath and Iron Acton will have to compete for those jobs with thousands of residents from the suburban areas of Bristol and South Gloucestershire .The percentage of new residents of Coalpit Heath and Iron Acton finding employment at the Science Park will therefore be minuscule. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christina Biggs - Friends of Suburban Bristol Railways |
| **Comment ID** | 19467329/377 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | As stated above we would support the developments only if adequate rail access is provided. This requires commitment in the Joint Local Transport Plan but also commitment in the S Glos Local Plan and also the WECA Joint Spatial Plan. |

| | |
|---|---|
| | In addition to Pilning (which could be a P&R for the region up to Thornbury until Charfield is delivered), we would also commend Thornbury Rail Station at Grovesend Rd roundabout. This is walking distance from much of the new housing in Thornbury itself and also within cycling and walking distance of the proposed Buckover village development.<br><br>We strongly suggest that the Thornbury Rail project be brought forward, funded and the business case with Network Rail (up to GRIP 3) is developed well before any further progress is made on Buckover Village. We understand from the Thornbury Residents Against Poorly Planned Development that even the usual infrastructure of sewage and water is absent in much of the region to the East of Thornbury and that the frequency of total gridlock on the A38 and M5 is frequent enough that even a MetroBus route would not solve the problem. MetroBus has the weakness that it cannot be always independent of the road network and that there are pinch points. Furthermore the travel time for the stops necessary to make the MetroBus service profitable would be well in excess of one hour to Bristol Centre, whereas the train journey from Thornbury via Yate would most likely be 48 minutes. |
| **Attached documents** | FOSBR Rail Plan 2018 postcard.pdf (831 KB)<br>FOSBR update on Tytherington Oct2017.pdf (1.9 MB) |

| | |
|---|---|
| **Respondent Name** | Jill White |
| **Comment ID** | 10710785/378 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Cromhall has already had considerable development in Bibstone including Drews Orchard and The Burltons and infill development. There are very high levels of HGV traffic along the B4058 through Cromhall much of this is from the Yate Industrial Site and traffic continues to break the speed limit. Cycling along this road is extremely hazardous. There is no cycle path and there are limited pavements, some very narrow and lorries pass very close to pedestrians on these narrow pavements. Many houses are situated very close to the road. More development would result in even greater traffic, noise and pollution causing a risk to health. Public Transport is very limited and most people use cars to get to services in Yate and Thornbury. There is only 1 small community shop, no Doctors, Dentists, a small Primary School and virtually no local employment. The sewage system cannot cope as flush their waste through the village and this has caused it to be overloaded causing obnoxious smells. It regularly floods into the road by Greenline Tanks. This is a small rural village and more development would overwhelm its character. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christina Biggs - Friends of Suburban Bristol Railways |
| **Comment ID** | 19467329/379 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Finally, we commend Coalpit Heath - a Park and Ride there would serve Emerson's Green as well, as this would be against the commuter traffic flow.<br><br>Coalpit Heath Railway Station is accessible both from the North and South and has space for parking as well as reinstating the rail passing loop to allow the Paddington to Cardiff trains to pass when the local train is stopped at Coalpit Heath. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Simmons - Westerleigh Parish Council |
| **Comment ID** | 17221409/399 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | **2.1. Urban Localities: Do you have any comments on the opportunities and challenges identified for the Localities?**<br><br>**WPC are particularly concerned with the impact on Westerleigh & Coalpit Heath.**<br><br>**As indicated in Appendix 3 of the SGLP Consultation Document it is important that Green Belt areas which define the villages are protected and differential maintained. This is particularly sensitive at the Western end of Yate.**<br><br>**Transport concerns are dominant;**<br><br>**Yate Railway Station is away from the Town Centre – the whole of Station Road needs a Transport Strategy to enable faster movement from the station to the centre.**<br><br>**Infrastructure support – there needs to be provision for all required services, educational, health, community & leisure, to support the additional population and reduce travel and congestion.**<br><br>**Employment for Yate: there are not enough local employment opportunities and any new jobs in Yate will also attract the increased populations of Iron Acton and Coalpit Heath, amongst others.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kevin Wilkinson - Avon and Somerset Police |
| **Comment ID** | 1052481/420 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | The areas all face challenges due to the high levels of crime in the areas. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alveston, Rudgeway, and Earthcott Parish Council |
| **Comment ID** | 19784545/429 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | **When considering the opportunities we need to ensure the unique selling points for each of the locations is considered and understood.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Daphne Dunning - Cromhall Parish Council |
| **Comment ID** | 16475073/602 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | 2.1 Cromhall Parish Council feels there are still not enough concrete promises on how a possible additional 10,000 people within a 4-mile radius of Junction 14 are going to gain employment or travel to this employment without penalty of future Congestion Charging even though the MetroBus will not come anywhere near our location, the 'Charfield Train' is only a possibility and local bus services do not offer a realistic service to any large employment zone. The persistence with Buckover Village in the Planning Schedule and the huge expansion of Charfield Village (serviced by a corner shop) highlights the desperation to hit targets despite viability issues staring us all in the face.<br><br>Cromhall Parish Council believes the JSP is still not offering enough practical solutions for the problems that it will create in and around the M5 Junction 14 area. Despite reassurances it still feels like the whole approach to the 'problem' of creating so many housing units within South Gloucestershire is – 'let's stick as many as we can up near the Gloucestershire border and worry about it later.' There are still no real plans to support the health, safety, educational and employment needs of the existing or proposed expanded community.<br><br>Currently there are no ' large' food outlets within 8 miles of Cromhall Village, residents have to travel to the nearest town for a Dentist, Doctor, bank, Secondary School etc. As the bus services are so limited, journeys must be completed by car, yet the town of Wotton Under Edge has a paltry amount of parking spaces. Where will access to basic services be found when an extra 3,000 people are between Cromhall and its current essential living resources?<br><br>Cromhall Parish Council believes with the vastly increased HGV road use from Yate to the M5 and associated local traffic increases effectively trebling the area's road use, it cannot see ANY concrete proposals to offer a solution to the fact that there is not an 'A' Road within 8 miles of the East side of Junction 14 of the M5, and many of the roads are nothing more than tarmac farm tracks. Junction 14 itself appears to have plans for improvements revised like the tides with no firm upgrade timescales.<br><br>With the road issues noted it is evident from the Emergency Service Response Data and the ongoing scaling back of fully Operational Service Despatch Centres that the safety of the residents can only get worse – this is neither progress nor acceptable as you are knowingly populating an under resourced area with 1,000's of people and multi thousands of extra vehicular movements. Despite the HGV Sustainability Survey, Cromhall Parish Council still stands by the belief that there are points on the pathway of the Bristol Road through Cromhall Village that are dangerous for pedestrians when HGV go past especially when at speeds far in excess of the imposed speed limits. Surely a Bypass is needed from Yate to the M5.<br><br>The JSP this year as opposed to last year when Councillors attended numerous Briefing Sessions and Community Forums is the same beast. Cromhall Parish Council does not see any real movement in accommodation of the voices of the communities affected or Plans put in place to alleviate their anxieties. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Zoe Hancock - Bristol Avon Catchment Partnership |
| **Comment ID** | 19832225/673 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | We note the areas identified as having potential to accommodate a new approach to Urban Living which seeks to intensify development in a sustainable manner. We will continue to support development which promotes sustainable use of water for the benefit of the community and environment. Water efficient development will reduce demands on the environment in terms of water resource and treatment. Rainwater run-off from new development must be returned to watercourse via the use of innovative Sustainable Drainage Systems (SuDS) including green roofs, rain gardens, swales and ponds. SuDS can reduce Flood Risk and provide additional ecological and amenity benefits.<br><br>The "Key Sites for change" will need to embrace SuDS to enable classification as "exemplar urban living development." |

| | |
|---|---|
| | We welcome the approach stated in The North Fringe Cluster that existing road space could be re-allocated for other forms of Sustainable Transport and other uses such as green infrastructure. We welcome the approach to introduce new cycleways and highway trees and suggest that these areas also include water sensitive urban design as new multi-functional open space can help to integrate new developments within existing area. We welcome the approach to reduce residential car parking on some developments in recognition of the good Public Transport and walking and cycling opportunities available. We suggest that these approaches could be adopted throughout the South Gloucestershire area.<br><br>The BACP is supportive that development around the river environment should endeavour to revitalise the rivers for people and wildlife. The Bristol Frome Improvement Project provides one opportunity to work in partnership to help identify sustainable solutions to help revitalise the Bristol Frome River Corridor and the areas for growth identified within this project boundary. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | James Carpenter - Falfield Parish Council |
| **Comment ID** | 16617825/737 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | As a result of the North Fringe cluster of developments (which includes sites at Cribbs Causeway, Patchway, Filton Airfield, Harry Stoke and Stoke Gifford) there is a very real danger of clogging up the A38 key transport route into the City Centre of Bristol.<br><br>We are concerned about the impact of intensifying so much development beside and reliant on the A38 at a number of sites (i.e. from Filton to Buckover) within one Local Plan Period.<br><br>The increased congestion will lead to longer journey times for all, particularly for those also reliant on the A38 and travelling from further afield such as Falfield Parish. |
| **Attached documents** | Falfield Parish Council (Mr. James Carpenter).pdf (1.9 MB) |

| | |
|---|---|
| **Respondent Name** | Barratt Homes (Bristol) Ltd |
| **Comment ID** | 16640513/771 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | See attached. |
| **Attached documents** | Barratt Homes (Bristol) Ltd - Barton Willmore (Robyn Nicholl).pdf (5.6 MB) |

| | |
|---|---|
| **Respondent Name** | Harrow Estates Plc and Robert Hitchins Ltd |
| **Comment ID** | 19898721/780 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | See attached. |
| **Attached documents** | Harrow Estates Plc and Robert Hitchins Ltd - Barton Willmore (Robyn Nicholl).pdf (6.3 MB) |

| | |
|---|---|
| **Respondent Name** | Heather Elgar - West of England Nature Partnership |
| **Comment ID** | 19839553/785 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Please find below Comments from the West of England Nature Partnership (WENP) in Response to the South Gloucestershire Local Plan Consultation.<br><br>For transparency, please know that Dominic Mellon (Consultant in Public Health for South Gloucestershire Council) sits on the WENP Board and thus note a declared conflict of interests. This Response reflects the aims and objectives of the Partnership and does not reflect views of individual Board members.<br><br>Question 2: Urban Localities:<br><br>WENP strongly welcomes the Vision for Yate (P. 48), ‘based on key principles such as walking and cycling, a strong landscape infrastructure and generous provision of children’s play facilities.’ |

| | |
|---|---|
| | WENP acknowledges that Charfield is a Strategic Development Location as identified in the Joint Spatial Plan. Due to ecological sensitivities in this area, WENP expects that the impacts of any developments that come forward will be aptly mitigated for. Although the expectation that development should result in no net loss in Biodiversity is stipulated in the National Planning Policy Framework, WENP acknowledges that it is challenging to realise this principle in practice. As such, WENP is keen to support the Council in the trialling of innovative mechanisms to make 'net gain' through development possible, including the Natural Capital Trust, the Natural Capital Planning Tool, and Building with Nature. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alison Humphreys |
| **Comment ID** | 19840129/984 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | I wish to register my objection to the proposed development of the sites in Hanham and Willsbridge.<br><br>On looking at the proposal, the very obvious first issue is how will the area cope with the additional traffic? Court Farm Road is already hazardous in places and used as a rat run in busy periods to avoid the Bath Road. It can be difficult at times to cross the road and cars tend to speed. Further development will add to these issues and there doesn't appear to be provision for this in the proposed Plan.<br><br>The most distressing point is the fact that you are proposing to develop a Conservation Area. Both sites are home for many species of wildlife and plant-life which surely should be protected when these sites have been recognised as Conservation Areas.<br><br>These sites are also extremely important for the physical and mental health of the local communities. The areas are used numerous times on a daily basis by people of all ages in the local communities providing exercise and important interaction with nature, essential for people's health and wellbeing.<br><br>In short, the roads cannot cope with the additional traffic, people's safety and health will be hugely impacted. And we will lose a very important Conservation Area.<br><br>I urge the Council to reconsider! |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Chris . |
| **Comment ID** | 19845505/990 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Hi,<br><br>I would like to object to the proposed developments in Hanham and Willsbridge.<br><br>I believe that there are enough Brownfield sites to develop in the near area without having to destroy Green Belt which is irreplaceable.<br><br>As someone who is to be a in the next I am very concerned that will not have green spaces to play in or explore as I did as a child growing up . Once the build starts, where will it end!?!<br><br>The traffic in the area is already too much with the build at Hanham Hall so any further build will just make this worse. I know we need houses but places like the old Kleeneze site would be more appropriate and even those extra builds will make the roads struggle.<br><br>The Schools are also struggling to perform so adding in extra children who need a good education will only make this worse.<br><br>I hope that the Council sees sense and protects the green spaces rather than building on them - protect for the future rather than destroying for the now. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anna Wheatley and Phil Bakker |
| **Comment ID** | 19845409/1026 |

| | |
|---|---|
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Dear Sir/Madam,<br><br>We would like to respond to the above Plan with regard to the proposed development of the Greenfield spaces in Hanham comprising the cricket pitch and Green Belt meadowland between Abbots Road and Hanham Hills and register our objection.<br><br>Whilst we recognise the need for housing in South Gloucestershire, we consider the proposed development of these 2 sites to be wholly inappropriate. It would result in the loss of an important sports field, which is currently easily accessible by foot and relocating it to the Green Belt would create a significant increase in traffic along Abbots Road, which is only single track in several places and already dangerous for walkers, cyclists and horse-riders.<br><br>Building on the Green Belt meadowlands would destroy an area of natural beauty with a rich Biodiversity including barn owls, Great Crested Newts and bats. The area is well-used on a daily basis by many local people walking their dogs, riding horses and rambling across Hanham Hills. The Local Plan states that it wishes to encourage people to engage in outdoor activities and enjoy their local environment and building on green spaces is in direct conflict with this. Green Belt areas perform an important role in preventing urban sprawl and maintaining green spaces between developed areas and loss of these would significantly impact the character of Hanham's urban edge.<br><br>Development of areas such as the Kleeneze factory site in Hanham would be a much better option, because it places homes in the centre of the community with easy access to shops, Schools and Public Transport. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Gill Pirie |
| **Comment ID** | 19840321/1051 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Hanham Surgery has nearly 22,000 patients already making it difficult to get an appointment, plus it is extremely difficult to find parking to use the limited amenities in so called 'Hanham Town Centre'! The Village High Street along with our local Schools, Youth Club and limited facilities will struggle to cope with increased demand. Small shops and businesses will only offer very limited extra employment opportunities particularly in these uncertain times of Brexit. People already reliant on their own transport will **NOT** leave their cars at home. Any increase in traffic flow is a major concern on our already crowded narrow streets and lanes that were never designed for high use. 'Rat runs' will appear making for 'an accident waiting to happen' putting our children and the elderly at risk. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | John Prior |
| **Comment ID** | 19844769/1067 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Dear Sir/Madam,<br><br>We have lived in and around the area for over years and have seen many changes to our area.<br><br>The latest development on the local Cricket field and surrounding area are giving us all major concerns in regards to traffic and local facilities into how the area will cope.<br><br>The proposed access to the new site for the sports facility is totally inadequate allowing the increase in traffic.<br><br>The access road is a single lane with major bends are not wide enough to take extra volumes of traffic and will cause accidents if major road widening is not accommodated.<br><br>To move a cricket field 800m when it could be accommodated on the existing common with new sports facilities there is beyond believe.<br><br>One question we do ask is why build on a cricket field that has been used for over 75 years when an area of land formerly Kleeneze in the centre of Hanham Village is not and is becoming a waste land.<br><br>Brownfield sites should be utilised first before green spaces are used.<br><br>We are against the proposed building on or around Hanham Hills and Hanham Abbots areas. |

| | |
|---|---|
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Martin Perry |
| **Comment ID** | 19836641/1069 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Dear Sir/Madam,<br><br>I wish to raise my strong opposition to the above mentioned planned development, especially North of Abbots Road.<br><br>The road between Hanham and Longwell Green is a narrow country lane which has a bottle neck as you approach Longwell Green i.e. down to one car width. This road is not fit to support the planned development of over 100 houses, let alone support cricket, football and rugby matches.<br><br>In addition, it will effectively join Hanham to Longwell Green and therefore, remove the Green Belt all together. It will just leave some fields North and South of the urban sprawl extending out from Bristol, intersected by the Ring Road.<br><br>I would raise concerns regarding drainage over the hills and also the effect on local wildlife - deer, badgers, rabbits etc …<br><br>It would really spoil a natural green space that many local residents enjoy on a daily basis.<br><br>Please do not build on this area of Green Belt. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Clifton Homes Ltd |
| **Comment ID** | 16617921/1079 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | **Please see submitted Representations.** |
| **Attached documents** | Clifton Homes Ltd - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (1.7 MB) |

| | |
|---|---|
| **Respondent Name** | Barwood Development Securities Ltd and The Thornbury Landowner Consortium |
| **Comment ID** | 19884545/1094 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Please find attached Representation. |
| **Attached documents** | Barwood Development Securities Ltd and The Thornbury Landowner Consortium - Savills (Miss. Felicity Tozer).pdf (650 KB) |

| | |
|---|---|
| **Respondent Name** | South West Strategic Development and Ian and David Knipe |
| **Comment ID** | 19884577/1103 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Please see submitted Representations. |
| **Attached documents** | SW Strategic Development and I. and D. Knipe - Grass Roots.pdf (27.4 MB) |

| | |
|---|---|
| **Respondent Name** | Progold Ltd |
| **Comment ID** | 19737665/1117 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Please see submitted Representations. |
| **Attached documents** | Progold Ltd - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (7.9 MB) |

| | |
|---|---|
| **Respondent Name** | Susan E. Green - Home Builders Federation (HBF) |
| **Comment ID** | 10761601/1132 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | The Urban Localities pose a number of opportunities and challenges for the Council including:-<br><br>o Long gestation periods of complex, high density regeneration sites which may cause consequential delay to housing delivery which the Council should take account of in its housing trajectory;<br><br>o High density developments are most likely to comprise of apartments rather than a variety of typologies to meet the housing needs of different groups. The Council should not under-estimate the challenge of encouraging households other than a transient population focussed on students and young professionals to embrace urban living in high density developments;<br><br>o The interplay between density, house size (any implications from the NDSS and M4(2) & (3) Standards), house mix and developable acreage and its impacts on viability especially if future development is located in less financially viable areas;<br><br>o If development is contingent on the provision of infrastructure and Public Transport services together with phasing of development if necessary. Such proposals are unlikely to be conducive to the delivery of needed housing or the provision of infrastructure.<br><br>It is also noted that the quantum of the Council's proposed HLS contingency is small (775 dwellings at Chipping Sodbury, 225 dwellings at NW Yate & 500 dwellings in rural area). The Council's proposed use of 5 yearly review as the release mechanism for these contingencies is not the speediest of solutions to the problem of slower than expected housing delivery. The Council should consider an alternative approach such as the allocation of reserve sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | BAE Systems Pension Funds Trustees Ltd |
| **Comment ID** | 19738113/1170 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Principally, the mechanism by which the boundaries for the North Fringe Cluster have been established are queried. Whilst it is clear that the Filton Airfield and Harry Stoke areas offer the greatest potential for change, it is a matter of fact that these areas are already allocated for development in the adopted Core Strategy. The new Local Plan should go further than this as there is significant scope for improvement across much of the wider North Fringe area, including the area West of the A38 at Filton. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Phill Bamford - Gladman Developments Ltd |
| **Comment ID** | 15612065/1176 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | **3.2 Question 2.1 – Do you have any Comments on the opportunities and challenges identified for the localities?**<br><br>3.2.1 Gladman has some concerns with the proposal to significantly increase the number of new homes to be built at the former Filton Airfield. Large scale Strategic Sites on former Airfields usually have long lead-in times and require considerable up-front investment in infrastructure. The ability to deliver high density development on such sites must be carefully thought out as typically, they are more suited to lower density family type of accommodation which is more attractive to the market in these locations.<br><br>3.2.2 The Council will need considerable evidence to prove that significant increases in residential development on the former Filton Airfield are actually deliverable and should make robust and realistic assumptions about lead-in times and deliverability rates to ensure that the Council can maintain a 5-year housing land supply across the Plan Period and to ensure deliverability of the Plan.<br><br>3.2.3 The Council also mention, on many occasions, that they could become involved in land assembly and potentially directly delivering development through a wholly owned company or through joint ventures. As set out above, this power should not be taken lightly and its use is far from easy to employ in a cost effective and efficient manner. Therefore, The Council will need to carefully consider its approach if it is serious about the use of such powers and will need to feed this in to any assumptions made on the timescales for delivery.<br><br>3.2.4 Gladman also has some concerns with the potential focus on the East Fringe Urban Centres as many of these locations are poor performing residential markets with a number of constraints, including air quality issues and Brownfield sites which may not stack up in terms of viability. Sites brought forward in these locations may not be able to provide Policy compliant Affordable Housing levels given the issues faced with viability in these locations. The Council will therefore need to carefully consider the deliverability of sites in these locations and have substantial evidence that they can be delivered. |

| | |
|---|---|
| | 3.2.5 Gladman support the identification of Yate as a town where regeneration and significant new development will be located. Yate has good transport links with Bristol including a direct rail link and is a town which provides a significant level of services and facilities. It has the potential to grow and offers both local employment opportunities as well as links with employment opportunities in Bristol and at Bath Science Park.<br><br>3.2.6 The Strategic Development Location to the West of Yate provides an opportunity for a high-quality development which is well related to the existing town, takes advantage of the services and facilities which the town offers and which can deliver a significant level of growth to support the development of the wider West of England.<br><br>## 3.3 Strategic Development Locations<br><br>3.3.1 The JSP identifies that 6,000 dwellings will be provided in 5 Strategic Development Locations across South Gloucestershire including Charfield, Coalpit Heath, Buckover Garden Village, Thornbury and Yate. These will be discussed and examined in detail at the forthcoming Local Plan Examination into the JSP and it will be for the SGLP to fully reflect the outcome of this process. Therefore, Gladman do not make any additional Comments on the Strategic Development Locations at this stage of the SGLP.<br><br>3.3.2 It is encouraging that the Council recognise that the deliverability of infrastructure and the viability of schemes needs to be understood early on in the Planning process. It is also welcomed that the Council state that unnecessary Policy hurdles in relation to the Strategic Development Locations need to be avoided.<br><br>3.3.3 As set out above, Gladman support the identification of Yate as a Strategic Development Location. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Julie and Lee Holbrook |
| **Comment ID** | 19840225/1188 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Dear Sirs,<br><br>We are writing to register our objection to the proposed Plans to develop the Green Belt land on Hanham Hills, behind Riverside Estate and Hanham Cricket Club.<br><br>We do not object to development in Hanham. People need homes, but we want to ensure that Green Spaces and the Conservation Area are protected for generations to come.<br><br>We particularly oppose the development on the Cricket Club and Hanham Hills. The area is absolutely unique for many reasons:<br><br>• The area around Abbots Road is an oasis of green and open space that is enjoyed by families, walkers, horse riders and dog walkers and has been for many, many years.<br>• It's an absolutely beautiful area and full of history, a historic Pound is currently being restored and there are old stone walls, hedgerows and trees in abundance that should be preserved.<br>• It's full of wildlife. We regularly see barn owls, birds of prey, woodpeckers and bats, badgers, rabbits, foxes and deer.<br><br>A more practical objection is the infrastructure:<br><br>• Abbots Road is a very narrow, windy country road which is already dangerously busy as it's used as a ‘rat run‘ by many motorists each day. The road simply cannot take any more traffic. It would be horrendous especially when the sports facilities were being used as well as all the extra residents.<br><br>• There is no Public Transport in the area at all.<br>• Has the impact of the increased levels of noise and light pollution from the sports pitches been taken into account?<br><br>There are still Brownfield sites locally that could be developed, the old Kleeneze site in Hanham is a prime example, which has much better road access and good Public Transport on the doorstep.<br><br>This is simply a heartfelt plea from us as local residents, who consider it an absolute privilege to live in this area for all the reasons listed above, to take into account the objections to this proposed development and look for additional Brownfield sites elsewhere to fulfill the housing requirements in South Glos and leave this area as it is to be enjoyed by our children and grandchildren. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kate Hyde |

| | |
|---|---|
| **Comment ID** | 19852353/1190 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Dear Sirs,<br><br>My neighbour has asked me to send you the attached letter in relation to the Local Plan 2018 as and does not use the Internet. She also asked me to mention that as she would feel with a picnic/play area immediately opposite bearing in the mind the problems and anti social behaviour including already experienced with the car park/picnic/play areas situated near .<br><br>Yours faithfully,<br><br>Dawn Sparey (on behalf of Kate Hyde)<br><br>Comments contained in the letter referenced above are shown below:<br><br>Dear Sir,<br><br>I am writing with reference to the "Call for Sites" in South Gloucestershire and with particular concern regarding the Green Belt land at The Batch, Castle Farm Road, Hanham.<br><br>I have had the pleasure of living here for over years and I am very concerned about the proposals to allocate Green Belt land for a housing development. In the time that I have lived here the increase in traffic on Castle Farm Road has been phenomenal, particularly over the last few years. I no longer myself but when friends visit they often comment on the difficulty negotiating Castle Farm Road due to the number of cars parked on the road and or pavement. It would appear that almost every house has at least two cars and if a further 180+ houses are built this could potentially mean another 300+ cars using this road. This road was never designed to accommodate the number of cars that are now using it without adding additional traffic.<br><br>I understand that the proposals include a play/picnic area which would be directly opposite . There are often problems with the play/picnic area that is already situated at the Avon Valley Woodlands car park including anti social behaviour and litter. If there were a play area opposite my house this may lead to congregating there when the car is locked. The proposed development would have an adverse effect on the privacy, outlook and enjoyment of .<br><br>I am concerned that the proposed development would lead to a loss of amenities for the wildlife on this site and the number of people that use the area as access to the Avon Valley Woodland.<br><br>It is increasingly difficult to get an appointment with the local GP Surgery and Dentist and this will only worsen if this development were allowed.<br><br>I strongly believe that we should be protecting the Green Spaces in this area because once they are gone they are gone forever. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | D. P. Wardle |
| **Comment ID** | 19836961/1192 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Having seen your proposition for the development of Hanham Abbots Green Belt sites, I feel I must raise my strict objections.<br><br>These proposals are in contrast to your Policy of developing Brownfield sites before considering Green Belt sites.<br><br>Your proposal sits on a small road which joins Hanham to Longwell Green. A road which feels extremely rural containing environmental beauty. This would be ruined by a housing development. Not only would this have environmental implications, spoiling natural beauty, and environment and habitat for wild animals, but would also spoil the air quality. Further, this would undoubtedly have a negative impact on house prices for the area. One of the attractions of the area when moved here years ago, was the rural beauty of this part of Hanham. This would be ruined by your proposal. This road, known locally as 'Sally on the Barn,' could not support the additional traffic, already contentious at the top of the hill which is single lane. It certainly could not support industrial traffic required for construction works.<br><br>There is also the issue of educational support for children. The Primary Schools are already busy and additional housing would put a strain upon this. The local Senior School, Hanham Woods Academy, is over subscribed and badly underachieving. Extra pupils would produce further strain impacting results and failing the children. |

| | |
|---|---|
| | There is also the issue of Hanham Cricket Club and Tennis club. A Cricket Club is a quintessential part of any English peri-rural community. The Cricket and Tennis Clubs are part of our local heritage. I understand that South Glos wish to move these to a site further down the road. What the Council seemingly neglect is the fact that the establishment of a cricket green takes years of work. This would likely have a huge impact on Club membership and could place the Club in jeopardy.<br><br>The proposed development at the existing Cricket Club site is unacceptably large. It is much larger than the John Chiddy development next to it which already looks messy. There is also a development on the other side of the Cricket Club. This new proposed development would see this part of my community turned from rural to completely urban in under a Decade. This is completely unacceptable.<br><br>Furthermore, there is very little Internet infrastructure due to the proximity to the nearest Junction Box. More housing would slow this down below the 5mbps we currently experience.<br><br>In summary, I strongly contest the proposition for both developments in Hanham Abbots. There is not the scope for increased traffic, this would have a detrimental impact on Schooling, there are significant environmental considerations and fundamentally this would reduce house prices of existing residents by ruining the natural beauty of the area.<br><br>South Gloucestershire Council would've failed its residents by building on these proposed sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Matt Douglas |
| **Comment ID** | 19838689/1194 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Hi there,<br><br>I just wanted to express my views on the potential future development in the Hanham area.<br><br>Being a local resident I am obviously going to have concerns about future development.<br><br>In the Hanham area there have already been a number of sites built on in recent years, such as the Hanham Hall development, Crest Nicholson development, Linden Homes development and more recently the Greenbank development.<br><br>I don't have any problem with the proposed Plan for the old Kleeneze site - this has been derelict for many years and is in desperate need of redevelopment.<br><br>However, the proposed developments for behind Hencliffe Way and the Cricket Ground are unnecessary and detrimental to the natural beauty of the area.<br><br>These are Green Belt sites and should remain that way for future generations.<br><br>Hanham has accommodated enough development in recent years to take its share of the region's burden.<br><br>Any more development in addition to Kleeneze requires the building of a new School and other amenities such as Doctors to accommodate such a fast-growing population. This doesn't seem to be part of the Plans.<br><br>The area behind Hencliffe Way used to be a Common many years ago and is regularly used by many dog walkers. It is also inhabited by endangered slow-worms and other wildlife and as far as I'm aware the land is unstable being so close to the valley edge. Traffic would become a big problem in the immediate vicinity.<br><br>The Cricket Ground contributes to the village feel of Hanham and by moving it further away will remove some of the character of Hanham.<br><br>The new proposed site is a beautiful oasis of greenery in a surrounding urban environment and should remain protected. The narrow lane that leads through the new site is not suitable for a significant increase in local population.<br><br>I hope that the Council takes account of these concerns and reaches the right conclusion in that the Hencliffe Way and Cricket Ground Applications are not viable and will be vigorously opposed by local residents. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | J. Box |
| **Comment ID** | 19453889/1213 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | I note that "South Glos CC will meet the needs for the future" and "protect the environment." If this is the case then perhaps the above Local Plan should be revised because, the proposal to build houses on the present Cricket Pitch and provide a replacement Cricket Pitch!(allegedly) further along the road where yet more houses will also be built, is at odds with the above statement by the Council.<br><br>The road, particularly below Sally on the Barn where the new Cricket Pitch and housing is planned is totally unsuitable for the amount of traffic which these new developments will generate. These housing developments are at the moment probably considered 'small scale' but from my experience of the Planning Authority, small scale build is increased, bit by bit, by subsequent Approved Planning Permissions. If these new 'small scale' developments are Approved initially then a precedent has been set and a whole new large scale development will be built on the surrounding green fields. How can this be considered protecting the environment? How is this 'meeting the needs for the future?' Might not green fields be needed in the future?<br><br>When land/green fields/Green Belt has been built on it is gone forever.<br><br>It is not necessary, it is not protecting the environment nor is it meeting the needs for the future to build on either of the sites mentioned above.<br><br>I appreciate that more housing is needed but there are far more appropriate sites on which new housing should be built - one of which is the Kleeneze site in Hanham which has been vacant for a long time, has easy access to shops and bus routes and could accommodate a large proportion of the houses or flats, which are needed. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mr. & Mrs. Dayman |
| **Comment ID** | 19802785/1215 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Dear Sirs,<br><br>I am writing to oppose and object to the proposed 250 homes on Hanham Cricket Club and a further 250 on Hanham Conservation Area. Together with the plan to build on Willsbridge green fields.<br><br>My objection is based on a number of areas I feel the South Gloucester Council on local Councils have not taken into account in the quest to fulfil Central Government's demand to build more homes, or face a penalty from Central Government.<br><br>1 - I believe the investigation into 'Brownfield' and in fill building have not been looked into with South Gloucester's borders.<br><br>- Land which was the old 'Kleeneeze' site still remains empty and under developed. Land with Kingswood and Warmley has not been explored. While land in Emerson Green/Ring Road areas, next to and adjacent to the 'new Rapid Transport route to Bristol' deliver a far greater, transport links with rail, and Public Transport. The roads are far superior than that of local village lanes and roads in the Hanham Green and Hanham Mills areas.<br><br>2 - I believe this is an easy option for local Government to instantly fulfil 500 homes with minimum work load for a local Government. It is easier to deal with one large developer that will, pay off the Council with, a new sports hall.<br><br>5 - The road lay out around this area is not suitable, the roads are narrow, winding and with no Public Transport along the 'Hanham Mills 'area towards Willbridge. The road along the 'Elm Tree Pub' Abbotts Road is only one way traffic. With up to 1,000 + cars on these roads is a oversize from Planners. This will only see parking spread to other areas in Hanham and Willbridge. As what is happening on the old "Lucas food - Bendix site' in Kingswood. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Miss. Clark |
| **Comment ID** | 19843873/1220 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Dear Sir/Madam, |

| | |
|---|---|
| | My name is Miss Clark, I moved to in to , when the Estate which it is today, only had houses on the site and I have watched all these houses being built.<br><br>I have watched Hanham over the years getting busier and busier with properties being built. Hanham is getting a very built up area, with more homes over the past years and having this beautiful green land which you want to sell and build more homes, please get real. Everyone I have spoken to around the Hanham Abbots area say they walk with their families and dogs, it would be heart breaking to build more homes on this land, for what lining the big boys pockets.<br><br>There is an estate building built in Longwell Green opposite Ablefit Tyres, there are more homes being built in Court Farm Road, Hanham High Street and the main road is very congested at present. Our Doctors and Dentists are full to breaking point.<br><br>We have Keynsham now being built on more homes, the road going into Keynsham is grid locked, has anyone looked at this? Please take the peoples' views and think before selling. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mary Windsor |
| **Comment ID** | 19845601/1226 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Reasons for not building any more houses in this area:-<br><br>After the War our forefathers had the foresight to recognise the need for everyone to have views of green fields and trees for the benefit of our health. Even the Council Estates had large patches of green.<br><br>Already houses being considered on the old Kleeneze site and Greenbank Road.<br><br>Little employment in the area so more cars when people travel to work.<br><br>With 4 Schools this side of the High Street and therefore probably 2,000 children attending each day the children's safety will be jeopardised.<br><br>How about building on the eyesore that is at the corner of Park Road and High Street, Kingswood? How |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sophie Feeney |
| **Comment ID** | 19845057/1230 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Dear Sirs,<br><br>I am writing to express my objections to the proposed to the sites on the Hanham Hills, North of Abbots Road and at the top of Willsbridge Hill next to the vets.<br><br>We have recently moved to this area mainly because of its proximity to countryside but still within an urban area.<br><br>We regularly walk along both of these sites and it's extremely sad to think they are both being considered for development which generations below us will not be able to enjoy.<br><br>I feel that other sites that do not have as much conservation or green space should be considered way before these sites.<br><br>Living just off , I am very concerned that these developments would cause to become a main road and not just a residential road. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Messrs Keller, Grace, Moorlen and Barnes |
| **Comment ID** | 19889409/1234 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Part 1 (Housing Requirements) and Part 2 (Spatial Strategy) including Questions 1, 2, 3 and Strategic Development Locations:<br><br>Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Messrs Keller, Grace, Moorlen and Barnes - Pegasus Group (Mr. Daniel Weaver).pdf (423 KB) |

| | |
|---|---|
| **Respondent Name** | Richard Bull - Environment Agency |
| **Comment ID** | 11527745/1253 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Dear Sir/Madam,<br><br>**SOUTH GLOUCESTERSHIRE LOCAL PLAN:**<br><br>Thank you for your Consultation regarding the above.<br><br>In response, the Agency has the following observations:<br><br>**Part 2 New Local Plan Strategy for Development:**<br><br>North Fringe Cluster (Cribbs Causeway, Patchway, Filton Airfied, Harry Stoke and Stoke Gifford):<br><br>It must be noted that any additional homes in the Cribbs Causeway/Catbrain area must not obstruct the Agency's operational and emergency access requirements to the Cribbs Causeway Flood Storage Reservoir. Any development design must take into account the reservoir inundation zones downstream of the reservoir and the associated implications.<br><br>For information, the Main River tributaries for consideration are the Henbury Trym (Cribbs Causeway/Catbrain), the Filton Brook (Filton Airfield), the Ham Brook & Bradley Brook (Harry Stoke) and the Stoke Brook (Stoke Gifford).<br><br>Science Park, Emersons Green:<br><br>For information, the Main River and Ordinary Watercourse in this location is the Folly Brook.<br><br>East Fringe Urban Centres (Staple Hill, Kingswood and Hanham):<br><br>Staple Hill, Kingswood - Notwithstanding the Flood Zone 1 designation, the Agency must advise that consideration is given to the proximity of the Warmley Brook.<br><br>Hanham – For information, the Agency is currently finalising a new hydraulic model for the River Avon between Bath and Bristol. The Flood Map for Planning (Rivers and Sea) will be updated as a result of the modelling outputs.<br><br>Yate:<br><br>The Environment Agency has undertaken an Options Appraisal to reduce Flood Risk in Chipping Sodbury and Yate. Currently there are approximately 130 properties below the 1:100 year standard of protection in Chipping Sodbury and Yate. Additionally, the Agency is working closely with Network Rail to reduce the risk of flooding to the railway line at Chipping Sodbury (main London to Bristol). The Options Appraisal identified that the preferred option can attract 50%funding from FDGiA however, the Agency is unable to find the remaining 50% from partnership funding. Accordingly, the Agency has presently paused the delivery of this scheme.<br><br>The Agency must advise that land is set aside to the East of Chipping Sodbury for upstream flood storage. Additionally, the Agency would encourage the Council to explore any potential for developer contributions towards this scheme, which would provide wider benefit to the community. Development must not increase Flood Risk and should seek any opportunity to alleviate any existing risk. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Clifton Rugby Football Club (CRFC) |
| **Comment ID** | 19991553/1264 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Dear Sirs,<br><br>**RESPONSE TO SOUTH GLOUCESTERSHIRE NEW LOCAL PLAN: CONSULTATION DOCUMENT (FEBRUARY 2018):**<br><br>I have been instructed by the Trustees of the Clifton Rugby Football Club (CRFC) to submit this Representation. To confirm the position of CRFC, it speaks with one voice but there are slightly differing perspectives in that:<br><br>o Executive Officers are determined to improve the Club, its facilities and grow in the community and they see the proposed wider developments in the area as a means of assisting towards this aim;<br><br>o The Trustees are bound, by law, to take a longer term view and to protect the assets of the Club into the more distant future.<br><br>Accordingly, the CRFC's intentions over the short term will be to improve its facilities at its current location but over the medium/longer term, CRFC may deem it fit to redevelop its existing site (in whole or part) for an alternative use and to use the funding towards an improved facility on adjacent land or in an alternative location. Accordingly, CRFC has a vested interest in Emerging Planning Policy.<br><br>To confirm, the current Planning Policy position, Paragraph 74 of the National Planning Policy Framework (NPPF) states that "*existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:*<br><br>o *An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*<br><br>o *The loss resulting from the proposed developments would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*<br><br>o *The development is for an alternative sports and recreational provision, the needs for which clearly outweigh the loss*."<br><br>South Gloucestershire Policies, Sites and Places Plan 2017 contains *PSP44 – Open Space, Sport and Recreation*, which covers proposals for the development of existing open space or playing fields. It states that developments will not be acceptable unless:<br><br>a) "An assessment has been undertaken which clearly shows the land and/or the buildings are surplus to requirements; or<br><br>b) The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location, and the replacement provision is available for use before the existing provision and its use is lost; or<br><br>c) The development is for alternative sport and recreation provision, the need for which clearly outweighs the loss."<br><br>On this basis, existing Policy in the Framework and the Local Plan adequately safeguards the Council's position in that an alternative suitable facility would be required in the event that CRFC seeks to redevelop its current location for residential or commercial use.<br><br>With respect to the new Local Plan Consultation, CRFC is concerned that the existing facility will be viewed as providing open space/recreational fields to support the proposed substantial residential development within South Gloucestershire. Previous Representations to this effect were submitted in response to the Cribbs/Patchway New Neighbourhood SPD Consultation in 2014, in the context of significant additional residential development coming forward in the immediate locality of the CRFC site.<br><br>With respect to the current Local Plan Consultation, the 'new approach to urban living' is of potential relevance. Whilst there is no 'in principle' issue to be raised with this approach, this statement on Page 32 of the Consultation Document is of particular note:<br><br>"*The opportunities for change in this area are focused on the former Filton Airfield, Patchway, Stoke Gifford and Harry Stoke. Through a number of site opportunities there exists potential to significantly improve the identity of the locality, maximise the use of land and enhance connectivity across the area. This includes the potential to consider significantly increasing the number of new homes to be built at the former Filton Airfield and surrounding sites which form the Cribbs Patchway New Neighbourhood. This potential increase is in addition to the number of new homes allocated in the Core Strategy*."<br><br>CRFC's main concern in this context is that it, as a private sporting organisation, should not essentially be 'taken for granted' as serving as sport provision for the proposed new residential development.<br><br>To confirm, CRFC in the short to medium term is happy to improve its existing facilities and acknowledges the existing land use and Policy position in that the site is classed as sports/recreational open space. However, CRFC does not wish for the Local Plan and subsequent development to act as an additional impediment in the future should it wish to redevelop the site in whole or part.<br><br>I would thus stress the view that Planning Policy Documents are only deliverable if the relevant landowners are willing to accept the proposed land use allocations.<br><br>Indeed, Para 157 of the NPPF states that "*Local Plans should:* |

| | |
|---|---|
| | o *Be based on co-operation with neighbouring Authorities, public, voluntary and Private Sector organisations*;"<br><br>Accordingly, if the new Local Plan puts substantial weight on the long-term retention of the CRFC facilities in this location, it could be criticised on the basis that it is not practical or deliverable. There is no objection in principle to the Council's aspirations for additional development in the locality, but we would not want to see these aspirations acting as an additional impediment should CRFC wish to relocate in the future.<br><br>I trust the above Representation is clear, however, should you have any queries regarding our Representation please do not hesitate contact me. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anita and Colin Houlding |
| **Comment ID** | 19840289/1265 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | We are residents on  and listed below are some of our objections to the proposed development of the Riverside Estate, Hanham Cricket Club, most of the Hanham Hills North of Abbots Road and land at the top of Willsbridge Hill, contained in the South Glos new Local Plan Feb 2018. Drawing Number 13247/SK03A Hanham and Willsbridge refers. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | John Debbie Prior and Family |
| **Comment ID** | 19844801/1274 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Dear Sir/Madam.<br><br>We as a family have lived in and around the  area for over  years and have seen many changes to our area.<br><br>The latest development on the local Cricket Field and surrounding area are giving us all major concerns in regards to traffic and local facilities into how the area will cope.<br><br>The proposed access to the new site for the sports facility is totally inadequate allowing the increase in traffic.<br><br>The access road is a single lane with major bends are not wide enough to take extra volumes of traffic and will cause accidents if major road widening is not accommodated.<br><br>To move a Cricket Field 800m when it could be accommodated on the existing Common with new sports facilities there is beyond belief.<br><br>One question we do ask is why build on a Cricket Field that has been used for over 75 years when an area of land formerly Kleeneze in the centre of Hanham Village is not and is becoming a waste land?<br><br>Brownfield sites should be utilised first before green spaces are used.<br><br>We are against the proposed building on or around Hanham Hills and Hanham Abbots areas. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Keigh and Ann Langridge |
| **Comment ID** | 19883649/1275 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Dear Sir,<br><br>W wish to lodge an objection to the proposed developments in Hanham.<br><br>Over the past Decade Hanham has been subjected to many new housing developments which have already resulted in diminishing the much loved rural character of the area. |

| | |
|---|---|
| | The views of the Hanham Hills, which was protected for so many years, is already partially obstructed and any further development would be overwhelming.<br><br>With regard to the proposed development of Hanham Cricket Club this would be devastating. I believe this Club was founded over 100 years ago and holds particular significance to the local community. Development of this area would deny residents and visitors of its beauty and recreational value. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | IM Land Ltd and The Davison Family |
| **Comment ID** | 19925889/1290 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Please see enclosed Representations Report on behalf of IM Land Ltd and The Davison Family prepared by Peter Brett Associates dated 30th April 2018. |
| **Attached documents** | Land Ltd and The Davison Family - Peter Brett Associates (Mr. Colin Danks).pdf (673 KB) |

| | |
|---|---|
| **Respondent Name** | Mr. Leonard Heland and Mrs. Bernadette Heland |
| **Comment ID** | 19816545/1297 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Dear Planning & Policy Department,<br><br>I am writing to give my feedback on the Consultation Document. My wife and I are residents living at . We strongly oppose any re-development of the Hanham Cricket Club and grounds for housing. The Cricket Club is a cherished facility and forms an integral part of the character and feel of the local community. We understand there is a proposal by developers to build houses on the Cricket Club site. If allowed to go ahead, this will destroy the whole character of the local area making it feel like one huge housing development. This cannot be allowed to happen. It will completely spoil the beauty of our local environment. We have spoken to many local residents who share our view and everyone we have spoken to have said "no" to any development of the local Cricket Club.<br><br>We appreciate the need for further housing. However, these should be confined to Brownfield site areas and development of sites which already have Planning Permission (but owners are deliberately delaying development). Our green spaces and assets like the Hanham Cricket Club & grounds are highly valued by the local people. Please ensure they are preserved for future generations. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Neil R. Higgs |
| **Comment ID** | 401345/1299 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Dear Planning Policy,<br><br>Please note my formal Response as a resident at .<br><br>Please register my objection to current proposals and Consultations around various undeveloped, Greenfield sites in the Hanham area; particularly supporting any consideration to ensuring the safeguarding and protection of these open spaces. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hanham Community Trust (Land at Hanham Community Centre) |
| **Comment ID** | 19926241/1326 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | The Draft Local Plan acknowledges that Hanham has an urban village character and an older demographic when compared with other urban localities in the North and East Fringes of Bristol. From this, the Plan notes there is an opportunity to build on the area's distinctive character by introducing new housing offers, along with a greater mix of uses in the local centre.<br><br>These points are all supported; along with the key challenges which relate to a greater mix of housing sizes and types and the provision of small-scale employment and retail space. From this, the area has good potential to contribute towards the Plan's urban living objectives. |

| | |
|---|---|
| | In our experience private rental sector developers are unlikely to deliver homes in Hanham at present. Currently, private rental sector developers will only consider sites that are within walking distance of major Public Transport Interchanges. In the West of England the principal location for this type of development is Central Bristol, near to Temple Meads Station. However, this trend may change as this emerging market matures and expands away from City Centre locations, meaning opportunities in the urban localities in South Gloucestershire could be explored in the future. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hanham Community Trust (Land at Hanham Sports Ground) |
| **Comment ID** | 20104449/1351 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | The Draft Local Plan acknowledges that Hanham has an urban village character and an older demographic when compared with other urban localities in the North and East Fringes of Bristol. From this, the Plan notes there is an opportunity to build on the area's distinctive character by introducing new housing offers, along with a greater mix of uses in the local centre.<br><br>These points are all supported; along with the key challenges which relate to a greater mix of housing sizes and types and the provision of small-scale employment and retail space. From this, the area has good potential to contribute towards the Plan's urban living objectives.<br><br>In our experience private rental sector developers are unlikely to deliver homes in Hanham at present. Currently, private rental sector developers will only consider sites that are within walking distance of major Public Transport Interchanges. In the West of England the principal location for this type of development is Central Bristol, near to Temple Meads Station. However, this trend may change as this emerging market matures and expands away from City Centre locations, meaning opportunities in the urban localities in South Gloucestershire could be explored in the future. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | A. T. Bennett & Sons |
| **Comment ID** | 19926433/1360 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Please see attached Representations. |
| **Attached documents** | A T. Bennett and Sons - Origin3 (Mr. Alex Cave).pdf (1.0 MB) |

| | |
|---|---|
| **Respondent Name** | Hanham Community Trust (Land North of Abbots Road) |
| **Comment ID** | 20107489/1368 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | The Draft Local Plan acknowledges that Hanham has an urban village character and an older demographic when compared with other urban localities in the North and East Fringes of Bristol. From this, the Plan notes there is an opportunity to build on the area's distinctive character by introducing new housing offers, along with a greater mix of uses in the local centre.<br><br>These points are all supported; along with the key challenges which relate to a greater mix of housing sizes and types and the provision of small-scale employment and retail space. From this, the area has good potential to contribute towards the Plan's urban living objectives.<br><br>In our experience private rental sector developers are unlikely to deliver homes in Hanham at present. Currently, private rental sector developers will only consider sites that are within walking distance of major Public Transport Interchanges. In the West of England the principal location for this type of development is Central Bristol, near to Temple Meads Station. However, this trend may change as this emerging market matures and expands away from City Centre locations, meaning opportunities in the urban localities in South Gloucestershire could be explored in the future. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Daniel Kelly - South Gloucestershire Liberal Democrat Council Group |
| **Comment ID** | 10311137/1421 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | **Pg 37 – The Science Park and Emersons Green:**<br><br>There is no mention under this Section of the need to improve accessibility between Kingswood and the Science Park in order to improve employment opportunities for Kingswood residents (which was one of the main objectives when the Park was originally conceived). Public Transport links been Kingswood and the Science Park are currently poor, and we believe that Policies should be included to redress this situation.<br><br>**Pg 48 – Yate:** |

| | |
|---|---|
| | The suggestion that the MetroBus could be extended along the A432 through Coalpit Heath is ridiculous, as there is not enough room for a segregated route, which is the entire point of the MetroBus. As we stated in our JSP Submission, this seriously calls into question the sustainability of Coalpit Heath as an SDL. We believe that the Local Plan should consider alternative, more viable, routes for an extension of the MetroBus to Yate.<br><br>The Local Plan needs to define the relationship between the proposed Yate urban living development, and the so-called Yate SDL, which is neither urban or in Yate. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Rebecca Thompson - Wallace Land Investments |
| **Comment ID** | 19935809/1473 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | The Urban Localities raise a number of challenges, namely but not exclusively:<br><br>• High density developments are most likely to comprise of apartments, therefore the variety of typologies to meet housing need will be limited/ constrained in high density areas. Such housing types and tenures attract student and young professionals whose occupation of such homes is often transient. The challenge for the Council will be encouraging families to the Urban Localities.<br><br>• How density, house size and type and the developable area of a site interact with viability, particularly in low value areas will be a challenge.<br><br>• Often high density regeneration projects can be overly complex and as a result of long lead-in and development periods may cause delay to housing delivery. The Council need to be mindful of this in its housing trajectory.<br><br>• If the delivery of development is dependent upon the provision of infrastructure and Public Transport services, combined with the phasing of development, such proposals are unlikely to be conducive to the delivery of needed housing or the provision of infrastructure. As housing delivery could be constrained by issues with the infrastructure provision and vice versa until external issues are resolved.<br><br>Wallace also highlight that the quantum of contingency built in by the Council is small, (775 dwellings at Chipping Sodbury, 225 dwellings at NW Yate & 500 dwellings in rural area). Furthermore, the mechanism for triggering this contingency is the 5 yearly review of the Local Plan. This is considered an overly long period to await a solution for housing need issues. The Council should consider an alternative approach such as the allocation of reserve sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Caroline White |
| **Comment ID** | 17228929/1497 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | **Kingswood:**<br><br>I agree with the key sites for change, especially the renovation of the Whitfield Tabernacle. It is vital that this important heritage site is preserved and opened to the public in some capacity.<br><br>There are some disused buildings in Kingswood, the old Lloyds Chemist shop and flats above on the High Street and the old Linden Hotel, these are an eyesore which make the High Street look very scruffy and could be usefully converted to accommodation.<br><br>**Hanham:**<br><br>I have enjoyed for nearly years. We moved to the area from East Bristol because we considered it to be leafy, close to the Avon Valley and countryside at the edge of Bristol - a great place to . I agree it still retains a sense of village character and I do value this.<br><br>I agree that public open and green space and sports facilities make this an aspirational place to live.<br><br>In principle I agree with the key opportunities stated, although I don't understand some of the terminology like 'land assembly.'<br><br>I agree we need a different range of housing types. Affordable Housing, in close proximity to services and transport links, is much needed.<br><br>I agree we need homes for downsizing and apartments for younger people. |

| | |
|---|---|
| | A cursory glance at the Rightmove site shows that the local housing market is top heavy with larger expensive dwellings.<br><br>There is very little accommodation available under £300,000. There are barely any apartments or two bedroomed houses available on the market.<br><br>I agree wholeheartedly to protecting the area's undeveloped open Green Spaces and that careful consideration needs to be given to Brownfield sites.<br><br>I am a member of the Hanham and District Green Belt Conservation Society.<br><br>I agree the key site for change should be the former Kleeneze site. It is ideally situated for Public Transport and pedestrian access to local services.<br><br>There is a lack of car parking space for visitors to the High Street. There seems to be quite a bit of under utilised space around Hanham Community Centre which may have some potential for car parking rental and or expansion for improved public space.<br><br>I am concerned at how the Call for Sites is at odds with the aspirations stated for the Hanham locality, because development in these sites would seriously detract from the landscape, character, quality and amenities of the locality. Two groups I belong to, the Hanham and District Green Belt Society and The Keep Hanham Special Group are taking legal action in relation to one of these Representations. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Jeremy White |
| **Comment ID** | 19936257/1504 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | KIngswood:<br><br>In my view there appear to be various unused buildings in the Kingswood High Street which should be utilised for accommodation.<br><br>Hanham:<br><br>The Kleeneze site just off Hanham High Street has been derelict and an eye sore for far too many years. It should be used for development due to its close proximity to transport, services and amenities. It would also facilitate improved parking for the High Street shops etc. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Berni O'Mahony |
| **Comment ID** | 10194497/1529 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Questions 2.1:<br><br>Hanham – It is incredibly disappointing that “protecting the area’s undeveloped open spaces and giving careful consideration as to how any Brownfield sites should be used…” is as a CHALLENGES rather than under OPPORTNITIES - given that:<br><br>1) The Kleeneze site is a perfect opportunity to develop for residential purposes with perhaps some parking to support the High Street and;<br><br>2) Majority of Green Spaces are GREEN BELT as well as of other importance and;<br><br>3) Both 1 and 2 are supported by the whole community and MP Chris Skidmore. Demonstrated by a Parish Survey and a Petition.<br><br>SGC should have removed the option for sites in the Green Belt and the Conservation Area in Hanham to be submitted to the Call for Sites Map. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Aviva Investors |

| | |
|---|---|
| **Comment ID** | 19935969/1549 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Dear Planning Policy Team,<br><br>South Gloucestershire Local Plan 2018 - 2036 Consultation:<br><br>I am pleased to submit these Representations on behalf of Aviva Investors to the South Gloucestershire Local Plan 2018 – 2036 Consultation process(hereinafter referred to as the Draft Local Plan). These Representations relate to our Client's land interests at Fox Den Road, Bristol (hereinafter referred to as the site).<br><br>Firstly, I would like to offer our general support to the provisions included in the Draft Local Plan. This Representation will focus on one key element of the Draft proposals relevant to the Fox Den Road site.<br><br>Urban Living Opportunity Area:<br><br>In the Draft Local Plan the site is located in an 'Urban Living Opportunity Area.' These are areas within existing urban locations where a new approach would potentially result in a number of key physical changes to the urban areas:<br><br>o "More and higher density building around Town Centres, including higher buildings, building on "back land" and building above shops and offices;<br><br>o A greater mix of more retail, employment, services, homes and community uses in Town Centres;<br><br>o A greater variety of homes by introducing more flats and smaller homes, private rented and Affordable Homes to complement existing stock; ?<br><br>o Redevelopment of underused land and buildings to enhance existing employment sites, as well as some changes of use from land which is currently safeguarded for businesses uses to mixed use or just residential use;<br><br>o Safeguarding, celebrating and repurposing Historic Assets; and<br><br>o Changes to public realm, Green Spaces, community services and facilities, parking and all forms of transport to cater for increased demand."<br><br>In many situations and on specific sites, the above approach is appropriate and will deliver better places and development as a result. However, there is significant concern that the Consultation Document does not sufficiently include reference to the need for these aspirations to be founded in market reality – it is key that developer interest and the viability that will deliver that density of development and uses in those locations is recognised.<br><br>For a number of the sites/locations identified the market isn't necessarily ready to deliver the scale and density of development sought. As a consequence this could ultimately have the opposite effect of holding back development rather than encouraging it. A plan or design-led approach of delivering a high density development, encouraged by a landowner seeking to maximise their financial return from the land, might result in a scheme which the development market is not willing, or able, to deliver.<br><br>Focus Going Forward:<br><br>Section 2.26 (titled Focus Gong Forward) of the Draft Local Plan confirms that "to implement this new approach to our urban areas, we need to develop Planning Policies which would achieve the potential benefits and address and mitigate any negative impacts." From this list, and relevant to the Fox Den Road site, are the following matters highlighted in the Draft Local Plan:<br><br>o "Prioritising areas which are capable of change by identifying Town Centre regeneration areas in some of our existing centres with a boundary and masterplan;<br><br>o Identifying key sites for change through redevelopment and reuse within and outside Town Centres - there could be better use of existing employment sites so that these would be re-designated for mixed use, new business premises and also homes. On some sites this may be a total change from employment to homes;<br><br>o Identifying the community services and facilities which would be required to support development and how these would be delivered; and<br><br>o Exploring Policy options and other mechanisms to support delivery."<br><br>It is essential that landowners are involved in this process to realise the above so that they can help shape Policies/allocations on their land. Input from the development industry is crucial in ensuring that the Urban Living approach encourages development that is both deliverable and viable.<br><br>In line with the quotation from the Draft Local Plan at the beginning of this Section, developing Policies to mitigate any negative impacts is a crucial objective. The new Urban Living approach must be seen as an opportunity to take the 'shackles' off sites with development potential that can improve our urban areas. Conversely, flexibility must be introduced into any relevant Policies to respond to site characteristics and current market conditions. |

| | |
|---|---|
| | The National Planning Policy Framework (NPPF) requires new Development Plans to be positively prepared; justified; effective; and consistent with national Planning Policy.<br><br>To be effective the Draft Local Plan needs to be deliverable over its Plan Period. By including provisions which consider matters vital to the practical delivery of development then the Draft Local Plan will be more likely to provide the growth and improvements necessary.<br><br>To be consistent with national Planning Policy, the Draft Local Plan proposals must adhere to Paragraph 173 of the NPPF. This confirms that "Pursuing sustainable development requires careful attention to viability and costs in Plan-making and decision-taking. Plans should be deliverable." Deliverability relies on reasonable and justified development Policies. These will need to be positive in nature rather than prescriptive to ensure the wider area transforms to its potential.<br><br>Fox Den Road Site:<br><br>It is hoped that the new Local Plan 2018 - 2036 will have a positive effect on developing the site. This is best achieved through continued discussions with all Stakeholders and a flexibility and willingness to maximise development potential. The types of uses being proposed in the Draft Local Plan are consistent with those being investigated and pursued by the landowner.<br><br>If you have any questions on the above then please do not hesitate to contact me. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | The Engine Common Trustees (ECT) |
| **Comment ID** | 19741409/1558 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Generally, it is considered unrealistic to expect significantly enhanced levels of completions from committed housing sites identified in the Core Strategy that are still to come forward. These sites are already at a point whereby the form and capacity has long been committed in terms of planning, co-ordination and viability associated with commencing development. A fundamental revisiting of such Important aspects could lead to yet more delays in commencement of development. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | M. S. Howes |
| **Comment ID** | 19741377/1569 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Generally, it is considered unrealistic to expect significantly enhanced levels of completions from committed housing sites identified in the Core Strategy that are still to come forward. These sites are already at a point whereby the form and capacity has long been committed in terms of planning, co-ordination and viability associated with commencing development. A fundamental revisiting of such Important aspects could lead to yet more delays in commencement of development. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Rockfield Farms Limited (RFL) |
| **Comment ID** | 20069217/1583 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Generally, it is considered unrealistic to expect significantly enhanced levels of completions from committed housing sites identified in the Core Strategy that are still to come forward. These sites are already at a point whereby the form and capacity has long been committed in terms of planning, co-ordination and viability associated with commencing development. A fundamental revisiting of such Important aspects could lead to yet more delays in commencement of development. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Downend Estates Limited (DEL) |
| **Comment ID** | 1463137/1594 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Generally, it is considered unrealistic to expect significantly enhanced levels of completions from committed housing sites identified in the Core Strategy that are still to come forward. These sites are already at a point whereby the form and capacity has long been committed in terms of planning, co-ordination and viability associated with commencing development. A fundamental revisiting of such Important aspects could lead to yet more delays in commencement of development. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hannah Saunders - Dodington Parish Council |
| **Comment ID** | 19931969/1606 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | **COMMENTS:**<br><br>2.1 Dodington Parish Council have concentrated on Yate, but some of these Comments could be applicable to the other localities that are being looked at….. Transport Infrastructure will be vital for the success of this area…. (for Yate link to M4 J18a is essential and should link to South Yate, Station Road and the Iron Acton Road to spread the traffic. A larte two-way Park and Ride serving Yate-bound traffic as well as Bristol-bound traffic, should be implemented as a priority. The MetroBus system should be extended to serve Yate and Chipping Sodbury as soon as possible). |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Taylor Wimpey |
| **Comment ID** | 20068353/1641 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | In principle we agree with the opportunities and challenges set out for the identified localities. We support the identification of the East Fringe Urban Centres as suitable locations to accommodate housing growth within South Gloucestershire and consider that they could logically be extended to include adjacent development sites such as that which Taylor Wimpey have interests in at Mangotsfield. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Peter B. Yeates, Brenda Yeates, and Sharon Wilson |
| **Comment ID** | 19845569/1649 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | To South Glos,<br><br>From: Peter B. Yeates, Brenda Yeates, and Sharon Wilson.<br><br>We oppose any development on the Hanham Hills, especially the Cricket Ground and adjacent fields, which lends still, the village green amenity and will not be served by moving it elsewhere.<br><br>Because it will remove it from where the loyal support, for Cricket and social activity is 'centred.'<br><br>It makes no sense.<br><br>Hanham Green is so essential for the people of Hanham to enjoy within their community as is the Cricket Ground and the surrounding green countryside. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Phil Hyde |
| **Comment ID** | 19802753/1651 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Dear Sir/Madam,<br><br>I have seen the Consultation Plans for building new home developments along Abbots Road from the Hanham Cricket Ground & along into Green Belt.<br><br>I strongly object to this development as all you are doing over a period of time is joining Hanham with Longwell Green into one town. Hanham has a special feel in that it is on the border of countryside and this will be destroyed, along with the wildlife.<br><br>Please do not allow this to go ahead. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | S. West |
| **Comment ID** | 19832033/1655 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | I want it to be known I am very against the building on the Cricket Ground. Where it is at the moment is easy and safe to walk to, however I hate driving along the road to Hanham Hills let alone walking it, and I will not be walking on the new footpath as it will take me twice as long.<br><br>Why do you have to ruin the open space of Hanham Hills which is always full of dog walkers and Ramblers, when you have run down sites that are an eyesore such as the old Kleeneze site in Hanham.<br><br>Also what is going to happen to the bottle neck at Abbots Road/Court Farm Road? This is always a problem as commuters use this as a short cut to Feeder Road in the mornings and evenings. With the hundreds of new houses and extra cars and the amount of cars in the Summer going to the river side pubs it's going to be chaotic. I think the Planners and the owners of the Cricket Club should look at the safety aspect of people rather than the money!!!! |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | E. H. Schubert Will Trust |
| **Comment ID** | 12403425/1669 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | The challenges identified at each of the sites are identical – the timely delivery of new homes as projected. It is recognised (and notably within the Draft NPPF March 2018) that larger Strategic Development Sites can take longer to bring forward than smaller sites. Reasons include on and off-site infrastructure delivery perhaps associated with construction phasing/agreements; developer delivery projections and local market demand.<br><br>Slow progress in respect of the delivery of large sites is evidenced in South Gloucestershire by the protracted delivery of Emersons Green East for mixed development. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ronald James |
| **Comment ID** | 19837921/1753 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Dear Sir/Madam,<br><br>I live on  and  backs onto the Hanham Cricket Field.  I wish to object to the proposals that are being put forward to flood this area with high density housing.  The local roads have already almost reached saturation point with the amount of traffic using them.  It is very difficult to get a Doctor's appointment at the local Surgery and the nearby Schools are oversubscribed as it is.  It's no good just building houses and increasing the population in this area without taking these problems into consideration. If more housing is required in Hanham then why hasn't the Kleeneze site been developed?  Also if the Folk Centre is so short of money that they need to consider selling off the Cricket Field, why not introduce paid parking meters in the Car Park that would raise money and benefit the local shops?<br><br>The proposed new site for the new Cricket Ground and Tennis Courts plus even more housing can only been accessed by a very narrow road, bordered by existing properties and boundaries, that only allow for a single car to go through at 2 pinch points.  I do not see how this road can cope with the amount of traffic all these new houses would generate. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sylvia Wiltshire |
| **Comment ID** | 19883297/1761 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | As for the Cricket Field being moved to Green Belt, well it beggars belief that this will ever happen. So many restrictions and no roads. It's just a proposal to convince people to accept the destruction of a part of Hanham that's been used and loved for years.<br><br>I cannot understand why it hasn't been realised that the future will be less shops and retail buildings.  We are already seeing shops boarded up because of the way shopping has changed to online.  Wouldn't it make more sense to bring people back into the High Streets by using these buildings to house people?  Soon there will be plenty of big retail buildings to use for accommodation when they have to close due to no customers. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sian Walker-McAllister |

| | |
|---|---|
| **Comment ID** | 19845153/1835 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | I am writing to respond to the Consultation and in particular to reflect on proposals to develop parts of Hanham, in particular the area of Green Belt adjacent to the Hanham Abbots Conservation Area. I frame this within an ethos of supporting local housing development and in particular ensuring there is sufficient sub-market rent and other Social Housing in order to meet the needs of the local population. Therefore, I have no objections to the development of Brownfield sites or in particular, in meeting the needs of the older population within Hanham close to the shops in the High Street and in particular to developing retirement housing. In fact, I recently supported a development of retirement housing in Memorial Road adjacent to Hanham Common. I also support the development of housing on the Kleeneze site in Hanham.<br><br>I absolutely reject the proposals to develop the land on the Hanham Hills and adjacent to the Hanham Abbots Conservation Area. Whilst not living in the Conservation Area itself; I enjoy as it gives an opportunity to enjoy the countryside and I know is of huge benefit to a large number of people living nearby for health and leisure activity as well as for its visual amenity.<br><br>I have lived initially (as a with ) and again since when to live in . Hanham is a community to which people often return and it is the very nature of the balance of urban fringe and countryside that attracts people to return and enhances the sense of community in the area. I now support older people in my community, of generation, whom around and knew . I would not have to had there not have been the proximity to the countryside, within walking distance of the hills, the woods and the river.<br><br>The Plan talks about infrastructure, and my opposition to the proposal to develop Hanham Abbots area is that the infrastructure is insufficient in terms of education and health provision. Travel accessibility is not good and whilst buses come into Memorial Road the roads are far too narrow down through Abbots Road and up through into Longwell Green to enable access for Public Transport.<br><br>I walk across the Hanham Hills and have also led Community Walks in this area. The flora and fauna in this area is incredible – Avon Wildlife Trust have sight of rare species and this would all be destroyed if housing development were allowed. I have just joined a Group known as "Keep Hanham Abbots Special" and this Group is doing some incredible work to preserve historic drystone walls in the Conservation Area as well as the ancient Animal Pound. This is a real community in action which has benefits which extend beyond personal involvement and will ensure that the population now and in years to come can enjoy this very special area, including Hanham Court and St. George's Church and are of significant historic interest.<br><br>Proposals to move the Cricket Ground in Abbots Road which has been there for many years are ridiculous. The suggested site lower down in Abbots Road is marshy and it would take 20 or 30 years for the land to be of sufficient quality for sporting activity.<br><br>South Gloucestershire needs to retain its balance of urban fringe and accessible countryside, particularly in the more highly populated areas such as Hanham – please listen to local people and do not develop the Green Belt in Hanham Abbots. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hilary Starr |
| **Comment ID** | 19937441/1842 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | I would like to register my objection to the proposed future developments for the following reasons:<br><br>The traffic in Hanham is already very congested and the sites currently due to be developed at the old Kleeneze Factory, Magpie Bottom and Greenbank Road will exacerbate the problem. Any further development will bring traffic to a standstill. There is also currently a very serious parking problem in Hanham, and shops and businesses are already suffering from this.<br><br>Local Secondary Schools and the Doctor's Surgery are already oversubscribed.<br><br>Hanham Cricket Club is very well situated being close to bus services, local shops etc. Moving it further down Abbots Road will encourage people to approach it from the Willsbridge end of the road, especially with the propsed new development there, and this extremely narrow road could not cope with the increase in traffic.<br><br>I have lived in for years and, although there has been much development in that time, I feel very sad that our lovely Green Spaces, especially Hanham Hills, will gradually disappear from view. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Nicola Little - Hanham Parish Council |
| **Comment ID** | 15276321/1843 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Morning , |

| | |
|---|---|
| | As promised Hanham Parish Council considered their Response to the Local Plan, Comments below.<br><br>**Hanham Parish Council's Response to Draft Local Plan 2018 - 2036:**<br><br>Hanham Parish Council accepts that one of the main challenges is to 'protect the area's undeveloped open spaces and give careful consideration as to how any Brownfield sites should be used.' With this regard it welcomes the development of the former Kleeneze Site and would like to see truly Affordable Housing being built here to attract First Time Buyers and older people looking to downsize. As your Consultation Document clearly states Hanham has the oldest population profile amongst urban localities. With a lot of the housing stock under-occupied the older population should be able to access smaller alternative dwellings and this Council hopes there will be robust controls on developers to deliver this type of housing.<br><br>Additional parking for the local community using the High Street is also a priority for the Parish Council and it is expected that this is provided within part of the Kleeneze development. Hanham Parish Council asks that this land is considered as part of the Plan and included in a CALL FOR SITES SUBMISSION.<br><br>It is understood that once the Consultation is completed, proposed sites will be assessed by the HELAA process and this Council would welcome the opportunity to Comment again at this time.<br><br>To summarise Hanham Parish Council is not against development, but supports carefully planned development of Brownfield sites to ensure that developers deliver Affordable Homes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | A. Watson |
| **Comment ID** | 19925761/1847 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | To whom it is concerned,<br><br>I have recently reviewed the Local Plan that has been published for Consultation and would like to offer my Comments regarding the proposal to permit future development of the Cricket Field in Hanham.<br><br>The proposal to develop the Cricket Field I believe is fundamentally flawed in a number of areas that would need to be addressed in the future namely:<br><br>1. The proposed development of 96 units is referenced to the dense development at the nearby Hanham Hall. I believe that this is too great a density for housing on this site. In particular I would reference the Authority's requirement on Crest Nicholson to reduce the number of their units on the site immediately adjacent to the Cricket Field and the low density development at Stone Hill View. The Hanham Hall development benefits from being contained behind high perimeter walls that existed previously.<br><br>2. There would be concern that any development on the Cricket Field would under provide for the number of vehicles that are likely to be owned thereby causing problems as parking spills over onto adjacent streets.<br><br>3. I note that the development of this site is hand in hand with the other development site on Court Farm Road. Should the Authority progress with supporting the development of the Cricket Field it must ensure that the linkage of the 2 sites is maintained and that construction of both sites is completed within a short time period.<br><br>4. Whilst the provision of an alternative Cricket Field is noted, the existing field is accessed by players and members walking to the field. The relocation site is inadequately served by footpaths that would offer a safe means of access to pedestrians. This point appears to have been glossed over by the proposer and their Transport Consultants. In addition to this, as at a local School, we would be unable to walk the School's Cricket Team to the relocation site and would therefore have to cease this sporting activity unless suitable transport could be arranged.<br><br>I also note that the Club has an extensive waiting list of players looking to join the Club and run nationally sponsored courses at which over players attend weekly throughout the Spring/Summer.<br><br>5. The existing Cricket Field benefits from soft surveillance from the nearby housing that the relocation site would not benefit from.<br><br>6. The relocation site indicates the provision of football pitches, however there appears to be a sufficient number of pitches already available within Hanham that would render the new pitches irrelevant. Hanham Common has two under utilised pitches that should be used more, I note that the Parish Council has approved plans to demolish the existing changing rooms and to build new improved facilities within the next year. |

| | |
|---|---|
| | 7. Any new sporting facilities on Court Farm Road will need to ensure that lighting of the buildings and pitches is properly considered within the context of the local ecology and habitats.<br><br>8. Any new sporting facilities will require sufficient parking to accommodate the player's vehicles and will need a full Transport Study to be carried out to ensure road and pedestrian safety along the narrow Court Farm Lane is not compromised.<br><br>9. Sporting facilities should be encouraged to be within communities to attract more participants, not placed at the difficult to reach edges of sub-urban development.<br><br>I trust my Comments are taken into account with your future considerations for the Local Plan and I would welcome the opportunity to consult further with you. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Trevor Jefferies |
| **Comment ID** | 19786593/1852 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | This area is one of the highest points in Bristol with amazing views towards Bristol and Bath. For those who get up early you can always see deer, barn owls, buzzards and Kestrels. All these animals feed on the abundance of food available due to the diverse habitat and wet areas.<br><br>The Road access from Court Farm Road through to Abbotts Road has already become a rat run, hence the speed ramps fitted this year. The narrow run from Sally on the Barn has caused daily rows with people nearly coming to blows as the pressure of traffic has built over the recent years.<br><br>The addition of the development at the Cricket Club and Willsbridge will make this stretch of road a nightmare for drivers and residents of the bungalows along this section.<br><br>There will also be huge pressure on an already overstretched Hanham Surgery and local Schools. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ian Beckey - TSSA, South West Transport Network, Railfuture, Bus User UK |
| **Comment ID** | 20207969/1904 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Question 2 - Yate.<br><br>Support MetroBus extension from Emersons Green and the City Centre via the M32 Interchange at Yate Station and Metro West Train services to Charfield, Cam and Dursley and Gloucester Central.<br><br>Yate can take Growth of Housing and Employment.<br><br>Support a Wc Landscaped Park and Ride at Nibley with MetroBus to Bristol and light Rail Link via Westerleigh to Mangotsfield, Emersons Green, Staple Hill, Fishponds to Bristol City Centre (With Interchange at Lawrence Hill Station) and Mangotsfield to Bath via Warmley, Oldland, Bitton and Kelston, Bath, with a walkway and cycleway provision.<br><br>Yate requires more high Density Housing in new Developments and around the Town.<br><br>Some housing could be built on top of the car parks around Yate Station Western Corridor.<br><br>Yate Station requires a bus-rail Interchange with the station.<br><br>The Town requires a network of Bus Lanes around the Town and on the route from Yate Station and Nibley Council Offices to Yate Bus Station.<br><br>MetroBus Link to Bristol City Centre via Coalpit Heath expanded Town. |

| | |
|---|---|
| | Welcome expansion of Yate but Parks open Spaces and public realm needs addressing on improved cycleway and walking network is required and further 20mph Zones installed.<br><br>The Centre of Chipping Sodbury need address and protecting as a Conservation Area and Gateway to the Cotswolds. The Plan fails to address the Tourism economy of the area worth a year to the four UAs in Greater Bristol less Bath City Centre. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Helen Bone - West of England Community Homes (WECH) |
| **Comment ID** | 20147425/1927 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | **Proposal 7: CLH and Urban Living:**<br><br>CLH can play a role in addressing densification of historic low-density urban areas, provide community support for re-classification of derelict land, ensure that residential permissions deliver affordable and Starter Homes at volume rather than larger 'executive homes' with a greater land take, and take advantage of the densification potential of CLH schemes to produce a better balance of private and communal space. We would like to see Planning Policy that enabled this in the urban areas that SGC is proposing for regeneration, investment and redevelopment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Amanda Grundy - Natural England |
| **Comment ID** | 1410849/1930 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | o Urban Living, Pages 28 - 31 – We welcome the fact that increased pressure on green infrastructure resources has been identified as a challenge, as has the need to encourage better connections between people from poorer backgrounds with nature and outdoor recreation. These are issues where continued cross-boundary working with other Councils is crucial and we would particularly encourage improvements to key GI assets within built-up areas and more imaginative use of Green Belt land adjacent to urban areas. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Rachel Sandy - Highways England |
| **Comment ID** | 19831713/1934 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Urban Living:<br><br>The concept of Urban Living is noted in the Consultation Document. Making efficient use of land to meet our needs acknowledges that the more intensive forms of development will be expected to be on suitable sites in and around a number of areas including locations with good accessibility to Public Transport routes and corridors. Highways England supports this approach in general in order to reduce the need to travel by private car.<br><br>It is noted that, with the envisaged increase in housing density, it is suggested that it may be necessary to have further Policies to manage car parking and indeed car ownership. These could include reduced parking at new development sites and residents parking zones in surrounding areas. This would be in keeping with an increasing reliance and provision of alternative modes of transport, and would minimise the impact of the intensification of land use on the SRN and the local road network. It is noted that the designated 'opportunity area;' for Urban Living is close to M5 J17 and M32 J1. Both these Junctions are congested at peak times, with little opportunity to improve capacity in the future.<br><br>The ambition, in travel terms, for these sites is noted. The Consultation Document says that the advantage of Urban Living is that it will reduce the need for travel which in turn can reduce congestion on transport routes within South Gloucestershire, to Bristol City Centre and other centres of employment. This will be achieved by major improvements in Public Transport and provision for walking and cycling. With these advantages in mind, it will be important to assess the impact of 'Urban Living' on the SRN and Motorway Junctions in particular and demonstrate that the trips originating from this form of new development do not adversely impact on the SRN. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Bloor Homes (South West) |
| **Comment ID** | 20211105/1948 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Please find attached Representation. |

| | |
|---|---|
| **Attached documents** | Local Plan 2018-36 - Coalpit Heath.pdf (205 KB)<br>Appendix 1 - Part 4.pdf (6.0 MB)<br>Appendix 1 - Part 2.pdf (6.7 MB)<br>Appendix 1 - Part 1.pdf (11.3 MB)<br>Appendix 1 - Part 6.pdf (17.4 MB)<br>Appendix 2.pdf (453 KB)<br>Appendix 1 - Part 3.pdf (7.3 MB)<br>Appendix 1 - Part 5.pdf (6.4 MB) |

| | |
|---|---|
| **Respondent Name** | Royal London Asset Management |
| **Comment ID** | 20029793/1958 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Dear Sir/Madam,<br><br>**South Gloucestershire Local Plan 2018 – 2036**<br><br>JLL have prepared these Representations on behalf of Royal London Asset Management in respect of Stover Trading Estate, Millbrook Rd, Yate, Bristol BS37 5PB in relation to South Gloucestershire Council's Emerging Local Plan published for Consultation in February 2018.<br><br>The Local Plan is being produced in line with the Joint Spatial Plan, which is currently being progressed by the West of England Authorities. It will cover the period 2018 to 2036 and will contain the detailed Strategy and Policies for delivering the development identified in it.<br><br>These representations relate to our Client's land interests at Stover Trading Estate, Yate (hereinafter referred to as the subject site). The aim is to encourage a more diverse range of uses onsite, including (but not limited to) offices, retail, leisure, care and residential etc. This is alongside improving the physical environment.<br><br>These Representations will demonstrate that the site is sustainable and suitable for the development proposed. Moreover the allocation of the site would accord with the principles of 'urban living,' which is a key focus in the Local Plan Consultation Document as well as supporting the regeneration aims for Yate outlined in the adopted and Emerging Local Plan.<br><br><u>Commentary:</u><br><br>The New Local Plan Consultation Document requests that Respondents comment on the changes proposed and provide an indication of potential (re)development sites. The key changes proposed that are pertinent to these Representations are:<br><br>o Potential regeneration zone in Yate between the station and Shopping Centre;<br><br>o Potential change in underused and vacant sites (including car parks), single storey buildings and rationalisation of community buildings offer the greatest potential along Station Road, Yate;<br><br>o Better use of space and new and enhanced business premises including potential for residential on site and upper floors, as part of a mix of uses in Western Gateway into Yate.<br><br>The above highlights the Western Gateway as an opportunity area. This area has not been defined in either the adopted or emerging Planning Policy; nonetheless, given the subject site's location at the Western entrance to the town it anticipated it is, or at least should be, located within this area. The Emerging Plan should be clarified to confirm the exact location of this area.<br><br>The client supports the abovementioned Policy aspirations as they clearly seek to enhance and sustain the future of Yate, particularly the area around the subject site. Nonetheless, a few changes are proposed to make the Policy clearer and to ensure delivery. These are summarised below.<br><br>1. Boundary of the Regeneration Area:<br><br>The boundary for the regeneration area should be made clear and should include the subject site as the Southern border fronts Station Road, which is the main transport link between the station and Shopping Centre. Physical improvements would have a positive impact on the surrounding area, particularly considering the existing low density, single storey dated industrial development, which does not currently make a positive contribution. This needs to be reversed in order to encourage the successful regeneration in line with the Core Strategy and Emerging Local Plan aspirations.<br><br>Allocating the site within the regeneration area would encourage development that should improve the quality of the area in line with the adopted Core Strategy Policy CS1 and the NPPF. Furthermore, more efficient use of the site would support the principles of urban living, which is a core focus in the Consultation Document. The principle of urban living is that it would encourage better use and density of urban sites to reduce the need to rely on Greenfield land. The Emerging Local Plan Document highlights Yate as a key urban living opportunity area.<br><br>In allocating the site as part of the regeneration area it would be essential to permit a broader range of uses, which is discussed in further detail below.<br><br>It is important to note the subject site is allocated as an interim safeguarded area for economic development under Core Strategy Policy CS12 until such time as redevelopment is bought forward in line with Policy CS30. The inclusion of the subject site within the regeneration area would therefore accord with the adopted Policy CS30 and more overtly support redevelopment.<br><br>It is important to highlight that there are no physical barriers to allocating as part of the regeneration area – aside from the small proportion of the |

subject site located in Flood Zone 3. This should not deter the allocation of this site as it is anticipated any scheme could be designed to minimise any Flood Risk.

2. Mix of Uses:

Another point that requires further clarity is the mix of uses that would be acceptable on the subject site as part of the regeneration area. The diversification of the uses permitted on site also support the principles of urban living, which as highlighted above is a key focus of the Local Plan Consultation Document.

As mentioned above the subject site forms an interim safeguard economic area until redevelopment comes forward in accordance with Core Strategy Policy CS30. The Policy provides little clarity on the uses that would be acceptable; however the supporting texts encourages a move away from distribution instead towards new start up enterprises – both of which are likely to fall within the B-use classes.

These Representations seek to broaden the mix of uses acceptable on site to include other employment generators, such as retail, care, leisure and hospitality. The majority of these are main Town Centre uses in accordance with Annex 2 of the NPPF. The subject site is not located within the current Town Centre boundary and this is not amended in the Emerging Local Plan. Nonetheless, a large proportion of the South part of the subject site is within the edge of centre boundary as defined in NPPF Annex 2. The NPPF and locally adopted Core Strategy Policy CS14 encourage a sequential approach to main Town Centre development – with edge of centre locations being considered when there are no suitable or available alternative sites within the boundary.

In order to support the regeneration of the wider area and improve the experience of the Western approach into the Town Centre a broader range of uses, including Town Centre uses, should be permitted albeit the amount of retail floor space would be limited to minimise the impact on the vitality and viability of the Town Centre. These uses will increase activity in the area and the overall visual appearance as the current dated inefficient industrial building could be replaced by new development to include offices, hotel and leisure buildings, which typically occupy smaller building plots and have a higher design quality. The delivery of these uses would therefore ensure the subject site made a more positive impact on the surrounding area supporting the regeneration aspirations.

Furthermore to the above, it is important to note that Town Centre uses provide a diverse range of jobs, which due to the more efficient site usage could generate a greater number of employment opportunities in comparison to the existing industrial use. This would support the principles of economic growth. It is also worth highlighting that the supporting text for Core Strategy Policy CS30 the aspiration is to deliver more start-up space. Available research suggests that in order to encourage successful Business Parks it is important to offer a range of services e.g. hotel and leisure provision, which further reiterates the need for a mix of uses to be supported at the subject site.

In addition to the above an element of residential development should be supported on the site. Similar to the uses highlighted above this will support the regeneration aspirations by improving the quality of the existing buildings and increasing the activity in the area. The site is an urban location where residential use would be supported. The main challenge would be the implications of the existing uses, however, it is anticipated through careful design, including focusing the development on the Southern part of the site, that any amenity issue could be overcome.

The sustainability of the subject site in close proximity to a range of transport links, including both rail and bus that provide direct access into Bristol and the surrounding area. Furthermore, it is important to highlight that the Joint Spatial Plan proposes an extension to the MetroBus to Yate. There is potential for this to run along Station Road, which would further enhance the sustainability of the location for a wide range of uses. This accords with both the national and local Planning Policy Framework.

Summary:

The subject site is considered a sustainable location for a greater mix of uses. This, alongside improvements to the quality of the area, will assist the wider aspirations for regeneration of Yate, which is a key focus of the Emerging New Local Plan currently being Consulted on by South Gloucestershire Council. To assist in delivering this the following changes are sought to the Emerging Plan:

1. Identify the site within the regeneration area.

2. Support a wider range of uses in the regeneration area to strengthen the existing commercial offer. These uses should include (but not limited to): retail, leisure and residential.

3. Clarity over the location of the Western Gateway.

Furthermore, the delivery of the site as per these Representations, taking account of the changes summarised above, would ensure sustainable development in accordance with the NPPF – as outlined below:

o Economic:

o Diversification of the uses permitted on site will broaden the type of job opportunities available.

o More efficient land uses will generate increased number of jobs in comparison to the existing industrial occupiers.

o Improvements in the type and amount of jobs available in the immediate area will reduce the likelihood of residents travelling outside the town for work. This is currently a considerable problem as it is understood in the region of 60% of the population travel elsewhere for work.

o Environmental:

o The proposed improvements to the subject site would improve the quality of the wider area and support the regeneration area proposed around Station Road in accordance with Core Strategy Policy CS30 and the Emerging Local Plan.

o The site is Brownfield in nature and relatively unconstrained and therefore the development of the site is supported in NPPF and Local Policies. Furthermore, the delivery of this site for alternative uses of a better quality will relieve pressure on other sites.

| | |
|---|---|
| | o It is anticipated that any potential Flood Risk or contamination issues could be reduced through remediation and careful design. Further investigation would be necessary on both points.<br><br>o Social:<br><br>o Broadening the uses permitted at the subject site to include leisure and retail uses will strengthen the local offer of these services in line with the NPPF Paragraph 23.<br><br>o Permitted residential development of the subject site will support the growth of this area.<br><br>The above clearly demonstrates that the subject site is a sustainable location and suitable for the type of development proposed both in terms of broadening the uses and physically improving the built form. Although these points are widely covered in the Emerging Policy it is recommended that certain aspects are strengthened to make clear the potential of the site and therefore simplify any Planning case for this to be bought forward in accordance with this.<br><br>I trust the information provided is sufficient to demonstrate the suitability and sustainability of the Land at Stover Trading Estate for a more flexible range of uses to support the employment aspect of the area. I would be pleased to discuss these Representations with Officers in more detail in due course. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | JFG Gunnery |
| **Comment ID** | 19741793/1971 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | The challenges identified at each of the sites are identical – the timely delivery of new homes as projected. It is recognised (and notably within the Draft NPPF March 2018) that larger strategic development sites can take longer to bring forward than smaller sites. Reasons include on and off-site infrastructure delivery perhaps associated with construction phasing/agreements; developer delivery projections; and local market demand.<br><br>The SGLP Consultation identifies at Paragraph 2.52 that a portfolio of smaller and medium sites could stimulate new sources of supply – including Self-build. Further emphasis should be placed upon delivery through smaller development sites. Such sites can support needs and, in rural areas, support local housing requirements.<br><br>The Government has recognised Self-build development as a real opportunity to help assist with the delivery of new homes and meet the requirements. The adopted Policies Sites and Places DPD advises, at Policy DPD42, that the Local Plan Review will bring forward Self-build land. These Comments and Call for Sites Submission respond positively to this. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | The Golledge Estate |
| **Comment ID** | 19896833/1994 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | **3. Consultation Response:**<br><br>3.1 These Representations are made in response to Question 2 on Urban Localities, specifically in relation to Harry Stoke/Stoke Gifford. The question asks:<br><br>Do you have any Comments on the opportunities and challenges identified for the Localities?<br><br>Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process?<br><br>3.2 We recognise all of the opportunities and challenges identified for Harry Stoke/Stoke Gifford. Similarly the 'New Approach to Urban Living' as a means of making the most of these opportunities and overcoming the challenges is supported, and the advantages of the approach are agreed with. The approach will help bring about a greater sense of identity, a more productive use of land and make the urban areas more attractive as places of choice for lifestyle and business development. The identification of the New Neighbourhood at Stoke Gifford as an 'Urban Living Opportunity Area' is supported, as is the proposed approach to increase the number of new homes to be built on existing site allocations in general.<br><br>3.3 The existing allocation of the subject site within the adopted Local Plan establishes the principle for development of this land for a mix of uses and landscaping. However the development of a new Local Plan presents an opportunity to better articulate the function of it in the context of the Plan's newly elevated ambitions. The key ambition of the 'New Approach to Urban Living' is to improve densities at appropriate and sustainable sites within the designated development boundaries. The subject site is within the existing boundary by virtue of its inclusion within the East of Harry Stoke New Neighbourhood and already enjoys convenient access to major road networks and Parkway Station. It is therefore considered a suitable site for making a contribution to delivering the ambitions of Urban Living.<br><br>3.4 The Consultation Plan notes under 'opportunities' that the existing Industrial Estates in Harry Stoke/Stoke Gifford are likely to present opportunities for higher density development for potentially a mix of uses in the longer term. We support this approach to making more efficient and sustainable use of land that is spatially advantage but currently in low density use. Some of the existing occupiers of this land might be re-accommodated within redevelopment schemes and some may be able to relocate to retained industrial and warehouse areas. However, it is likely that there will also be a need to make new provision for relocation of some occupiers if the full potential of Brownfield land is to be realised, as it needs to be. Land for relocation of industrial, warehouse and related uses should be in edge of city locations on main transport routes. Such |

| | |
|---|---|
| | provision has an important role to play in enabling higher density development to make better use of Brownfield land that within the existing urban area.<br><br>3.5 The Local Plan Consultation makes little mention of this potential issue of relocation, reserving this for later stages of the Planning process and partly for the HELAA. We consider the provision of quality employment land in locations well located in relation to the road network to be of fundamental importance to the Local Plan Strategy. Urban living and maximising the use of Brownfield land in central/neighbourhood locations and those well served by Public Transport is a key priority. It must therefore be supported by other elements of the Strategy to enable delivery of Brownfield potential. It is important that this Strategy takes advantage of sites that are well suited to accommodating relocations of industrial and warehouse uses to unlock the full potential of Brownfield land. It also provides great potential to reduce traffic movement into more central and neighbourhood areas, especially commercial traffic and Heavy Goods Vehicles. The Land at Old Gloucester Road is considered, a suitable site for employment premises as part of mixed-use development including an element of residential. The site might potentially also include one or more of motor trade, hotel, health and elderly persons housing.<br><br>3.6 As such, it is our suggestion that later stage Consultation of the Plan should seek to define locations for new employment land, well located in relation to transport infrastructure, to support realisation of the 'New Approach to Urban Living.' The Planning Authority should be open to, and encourage, landowners making Representations for employment land in these locations at Consultation stage and establish a process within the HELAA which will assess commercial land Representations against 'Urban Living' criteria and test how each site can contribute to these specific aims of the Core Strategy. In this regard we believe our proposals for commercial development on Land at Old Gloucester Road performs well.<br><br>3.7 As well as locational advantages in facilitating Urban Living, the site also offers the potential for employment uses to face onto the B4057. This is a major road offering good exposure for businesses which will likely make the site very attractive for commercial occupiers, including those which might be relocated from less visible Brownfield sites as a result of the new approach to redeveloping industrial and commercial areas for more mixed uses as a contribution to delivering the Urban Living objectives of the Plan.<br><br>3.8 The Local Plan also acknowledges that Stoke Gifford/Harry Stoke is *'an area that lacks a clear sense* of place, with large land holdings laid out as self-contained establishments for institutions and businesses, within a broader setting tha*t is dominated by roads and cars.'* In this regard there is a recognised need to *'put in place Policies that enable a stronger sense of townscape and active streets* and better integrate the different elements of the locality through new high quality, taller and more dense forms of development, supported by improved landscaping, walking, cycling facilities and *enhanced Public Transport connections to Central Bristol and the wider South Gloucestershire area.'* Given the requirements for high quality and dense landscaping buffers on the site, it offers a good opportunity to create a more characterful and green edge-of-urban area than exists at present. This will also help reinforce the existing character of Old Gloucester Road, which in itself has quite a rural feel which could be better reinforced by landscaping and screening from the M4. The proposed development of the site can therefore contribute to creating a sense of place which is in keeping with its position at the rural-urban boundary and reduce the current sense of domination by exposed car and road networks.<br><br>3.9 The design of landscaping on the scheme will also ensure that the site can realise its role more effectively as part of the Strategic Green Corridor and uphold the aims of current Core Strategy Policy CS2, namely:<br><br>• Realising the potential of Green Infrastructure to assist with mitigation of, and adaptation to, Climate Change.<br><br>• Delivering high quality multi-functional and connected open spaces.<br><br>• Creating and improving recreational opportunities.<br><br>• Protecting and enhancing species and habitats, and creating new habitats and wildlife linkages between them.<br><br>• Enhancing landscape character and natural features.<br><br>3.10 A mixed development of employment and residential would support early delivery. The attractiveness for non-residential use would start diminishing to the South as the topography becomes more marked. The Northern part of the site is more elevated and lends itself better to commercial use, whilst the tree screen to the South also presents an opportunity to deliver high quality landscaped surroundings for residential uses.<br><br>3.11 The YTL scheme on Filton Airfield will produce an impressive urban apartment lifestyle offer. But we believe there will also be a smaller market for those seeking a setting which is less urban in character which can be satisfied at this site. The location is also convenient for getting to the Northern Arc employers, the MetroBus and Parkway Station.<br><br>3.12 The Consultation Document also states that the Council is investigating how it can play a positive role in widening the ways in which new development is delivered and encouraging a mix of potential developers, including facilitating the involvement of local businesses. The Council is also keen to hear from developers with an interest in alternative models of delivery, such as the Build to Rent/private rental sector. As a rare example of a New Neighbourhood site outside the control of existing housebuilders, it is considered that the Old Gloucester Road site can assist in the delivery of these alternative models. In particular the opportunity for a residential element may be suitable for Build to Rent or PRS in a New Neighbourhood where these tenures are otherwise not likely to come forward. This proposed aspect of the Local Plan is therefore supported and our Client is willing to open conversations with the Local Authority on this matter. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | The Owner/Occupier |
| **Comment ID** | 19784385/2001 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Dear Sir/Madam,<br><br>I was quite pleased to receive your letter dated 2nd February regarding the Council's new Local Plan. |

| | |
|---|---|
| | Unfortunately, I am of the group who do not entertain the use of a computer and thus "online" which in my view is the worst thing invented.<br><br>However, if I can see the Documents involved in the Planning Decisions I would be happy to Comment.<br><br>My initial Comment relates to the developer who has tried a number of times to obtain Planning Permission and in my view is trying to force the Council to relent and grant Permission despite the wishes of the local residents who have repeatedly expressed their views that amongst other Applications the local residents are against such developments.<br><br>I feel sure that any development which guaranteed Affordable Housing and I mean Affordable, not the level of affordability such as the developer means.<br><br>We are local people not emigrants from London where affordability is considerably higher than such a community as ours can afford.<br><br>This applies to the number of homes proposed for the fields off Roundways?<br><br>I can understand the need for more homes but it also needs local development of jobs and businesses not just dormitories.<br><br>As it is at the moment the local bus company decides what services they will support and consequently the services get less convenient. I would have thought that the Council would have more say in what licenses are granted.<br><br>Having read this letter you will probably steer clear of my views in future. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Douglas Homes |
| **Comment ID** | 20120033/2010 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Many of the available Brownfield sites are in areas with the capacity for change. Generally, they are not in areas which are constrained by heritage/ conservation or landscape designations and therefore offer opportunities for change which can benefit and enhance the surrounding environment. The Local Plan Consultation Document notes that the new approach to Urban Living could result in more higher density buildings around Town Centres. However, the opportunity to increase densities should not just be restricted to Town Centres. Many of the urban areas in which the available Brownfield sites are located (outside of Town Centres) do not make efficient use of land and any new development should not necessarily follow the prevailing densities of the area. Each site must be considered on a case by case basis and there will be opportunities, outside of the Town Centres, where higher densities will be appropriate.<br><br>The Sustainability Appraisal Report which supports the Local Plan sets out the many benefits to maximising the use of sites in the urban areas, which apply equally to sites within and outside the Town Centres:<br><br>• Encourage investment, development and regeneration in areas suffering deprivation such as Kingswood and Staple Hill.<br><br>• Maximising the use of Brownfield land will reduce the requirement for utilising Greenfield land and rural land beyond the urban areas.<br><br>• Sustainable access to existing retail/food buying facilities.<br><br>• Sustainable access to educational facilities.<br><br>• Higher densities can increase the footfall of Town Centres, improving the viability of existing shops, and potentially creating the opportunity for expanded facilities. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ellandi LLP and The Englander Group |
| **Comment ID** | 20119969/2017 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Question 2 – Urban Localities (Yate):<br><br>We have also reviewed the opportunities and challenges that are identified in respect of Yate and wish to express our high-level support, particularly in regard to your objectives for the main Shopping Centre island and the provision of a greater mix of more retail, employment, |

| | |
|---|---|
| | services, homes and community uses in Town Centres. We would welcome a meeting with you as soon as possible to discuss these opportunities in more detail as well as to set out in more detail our Client's own aspirations for Yate Shopping Centre and the challenges/opportunities it faces. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ellen Kenny - Siston Parish Council |
| **Comment ID** | 7853761/2025 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | *Comment - The current Caravan and Home sales/storage site at Station Road, Warmley has been subject to considerable extension. This near centre of Warmley Village location is at a position on the road network causing disruption, congestion, road dangers and annoyance for local householders.*<br><br>***Recommend this site be promoted for reuse to low level residential.***<br><br>**PAGE 42 Kingswood - key sites for change – 'Whitfield Tabernacle and Warmley Gardens are both nationally important historic sites which represent the importance of the area for the Methodism Movement and early Industrial Revolution. Both sites are at risk from decay. Achieving the preservation of these sites and bringing them to a wider audience would help to enhance the area and celebrate Kingswood's unique identity. There is potential to link these with groups of heritage and natural assets in both Kingswood and Warmley to improve access, interpretation and appreciation of the area's heritage."**<br><br>**QUESTION 2 - Do you have any Comments on the opportunities and challenges for the localities?**<br><br>***Recommend***<br><br>*All with knowledge and interest in the historic site of Warmley Gardens welcome the prospect of improved preservation and promotion by linking it to that of the equally important Whitfield Tabernacle site. We recognise both the Champion and Whitfield complexes as representing Kingswood's unique identity, we also believe both to be in early need and continuing investment. It is considered such local and national heritage assets should benefit from a Policy providing Planning gain when all future developments in these localities are Approved.*<br><br>**Submitted by Cllr John Hunt in advance of the meeting of Siston Parish Council on Thursday 15th March 2018 providing relevant background information and recommendations for the consideration of those present on that occasion.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sue Hope |
| **Comment ID** | 411169/2035 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Under bullet point of Paragraph 2.18; it should be emphasised that there is a need to bring down the cost of Public Transport and to bring employment closer to where people live. Failure to do so will mean that those on low incomes or without jobs will struggle to be able to take advantage of new employment opportunities.<br><br>**The Science Park and Emersons Green:**<br><br>There is no mention under this Section of the need to improve accessibility between Kingswood and the Science Park in order to improve employment opportunities for Kingswood residents (which was one of the main objectives when the Park was originally conceived). Public Transport links been Kingswood and the Science Park are currently poor, and Policies should be included to redress this situation. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Melanie Gregory |
| **Comment ID** | 3895489/2042 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | **Objections to the Hanham Cricket Field site development.**<br><br>Increased traffic on Abbotts Road. This road is already quite dangerous at peak times with its narrow areas and sharp bends. It is certainly not designed to deal with the volume of traffic the additional houses on the proposed site and will make this road far more dangerous to drive and also walk along. |

| | |
|---|---|
| | If this development goes ahead along with the Castle Farm Development it will make the Hanham area clogged with traffic and will detract from the Village feel to the area. It will also make it more difficult for young people walking or cycling to School to get there safely.<br><br>Although I note from the developer proposals that they plan to relocate the Cricket Ground to a new site across the Dual Carriageway. If this site is to be developed, it will deter local people from using it as the new site will require either driving there, or having to take a long bus journey with heavy equipment, as walking there (as many locals currently do) will then not be an option. |
| **Attached documents** | Hencliffe Way 1.pdf (1.1 MB)<br>Hencliffe Way 2.pdf (522 KB)<br>Hencliffe Way 3.pdf (1.2 MB) |

| | |
|---|---|
| **Respondent Name** | Sebastian Loyn - YTL Developments (UK) Limited |
| **Comment ID** | 19779841/2076 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Whilst SGC identifies the Airfield delivering a large portion of these 2,900 homes more detail around numbers and timings would also be beneficial. YTL can support SGC in any evidence based assessments for the Airfield, which we would welcome then being formalised through the Local Plan process.<br><br>In support of this densification of the Airfield, YTL would draw attention to the fact the Density and Heights Parameter Plans Approved under the current Consent, if maximised could deliver an additional c.1,500 homes within the Airfield. Whilst the Approved scheme does not address some of the 'key challenges' identified on Page 34 of the Consultation Document, in particular any impact to the Transport Network and public open space. YTL can review all these aspects and any mitigation required in order to achieve higher density on the site in a sustainable manner.<br><br>At this point it is also worth noting there are 1,000 homes within the CPNN (Cribbs Patchway New Neighbourhood) and currently no Planning Application has been made to deliver these homes. These 1,000 homes sit within the strategic modelling within CPNN, in particular addressing and mitigating the transport impact. If it were determined these were unlikely to come forward within the Plan Period, then YTL would support the 1,000 homes being re-allocated to the Airfield, which would enable the fast delivery of much needed homes within the Planning Period with relevant transport mitigation measures already identified.<br><br>With regards to more specific information provided within the Consultation Document YTL supports Section 2.23 identifying:<br><br>o More and higher density building around Town Centres, including higher buildings building on "back land" and building above shops and offices;<br><br>o A greater mix of more retail, employment, services, homes and community uses in Town Centres;<br><br>o A greater variety of homes by introducing more flats and smaller homes, private rented and Affordable Homes to complement existing stock;<br><br>o Redevelopment of underused land and buildings to enhance existing employment sites, as well as some Changes of Use from land which is currently safeguarded for businesses uses to mixed use or just residential use.<br><br>In addition to this, within 2.26 the Document identifies the need for some Policy changes to support these urban 'locations.' In particular YTL support SGC's acknowledgment that a review of public open space, which we feel needs to take a more **qualitative** focus rather than quantitive. It is worthy of note that crudely if Bristol City Council's POS requirements were applied to the Airfield the current allocation of public open space would be suitable for a significantly higher number of homes without any qualitative improvements. SGC may want to consider a different Policy approach for Brownfield sites within the Northern and Eastern Fringe that reflect these urban environment.<br><br>YTL also support the acknowledgment that the Parking Policy will need to be reviewed in line within the identified urban areas, promoting active travel and public services, but these must be supported by Public Transport and safe cycleways to deliver effective change.<br><br>In addition to this YTL would welcome SGC also reviewing its Policy on 'back to back' distances for homes as this will also impact on the ability to deliver denser, more sustainable development.<br><br>Generally YTL see 'Section 2' of the Local Plan as an encouraging step change and would welcome formalising any additional allocation on the Airfield through the Local Plan process, working closely with local community groups, Stakeholders and the Council. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alex Atkinson - Edward Ware Homes (Land East of the A4174, Shortwood) |
| **Comment ID** | 19323937/2096 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |

| | |
|---|---|
| **Comment** | Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Edward Ware Homes (Mr. Alex Atkinson) - Pegasus Group (Mr. Daniel Weaver).pdf (2.6 MB) |

| | |
|---|---|
| **Respondent Name** | Alex Atkinson - Edward Ware Homes (Land East of Coalpit Heath) |
| **Comment ID** | 20247169/2106 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Edward Ware Homes (Mr. Alex Atkinson) - Pegasus Group (Mr. Daniel Weaver).pdf (57.6 MB) |

| | |
|---|---|
| **Respondent Name** | Alex Atkinson - Edward Ware Homes (Land at Woodhouse Down, Almondsbury) |
| **Comment ID** | 20248001/2117 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Edward Ware Homes (Mr. Alex Atkinson) - Pegasus Group (Mr. Daniel Weaver).pdf (14.4 MB) |

| | |
|---|---|
| **Respondent Name** | Jackson Moulding - Ecomotive Limited |
| **Comment ID** | 20165345/2138 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | **Proposal 7: CLH and Urban Living:**<br><br>CLH can play a role in addressing densification of historic low-density urban areas, provide community support for re-classification of derelict land, ensure that residential permissions deliver affordable and Starter Homes at volume rather than larger 'Executive Homes' with a greater land take, and take advantage of the densification potential of CLH schemes to produce a better balance of private and communal space. We would like to see Planning Policy that enabled this in the urban areas that SGC is proposing for regeneration, investment and redevelopment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Paul Davis - Persimmon Homes Severn Valley |
| **Comment ID** | 3553569/2140 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | **5. New Approach to Urban Living:**<br><br>5.1 PHSV consider the emphasis of the Strategy to maximise Brownfield development is inappropriate in relation to National Guidance. NPPF17, bullet point 8 encourages the effective use of land that has been previously development (Brownfield land), provided that it is not high environmental value. Draft Planning Policy Guidance now proposes the following wording – *'give substantial weight to the value of using Brownfield land within settlements for homes and other identified needs and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated and unstable land.'* Therefore the guidance encourages making the best use of Brownfield land but not to maximise it, with the implication that development on Brownfield land with be prioritised over other land.<br><br>5.2 We note that the new approach will result in higher density development, higher buildings, building above shops and offices, more flats and smaller homes and change of use of land currently safeguarded for business use. However, the Plan and its Supporting Documents provide no evidence on how higher densities will be achieved. In fact, Paragraph 2.25 identifies substantial challenges to this approach and we are particularly concerned about the need to support a cultural change in order to support delivery. In our view it requires more than that, and an important issue is whether there is a demand for higher density and apartment living in South Gloucestershire, and even if there is in the suburban areas of Bristol within South Gloucestershire, does it also extend to Yate?<br><br>Recent Research:<br><br>5.3 A recent Survey by Savills and the NHBC Foundation (Beyond location location location: priorities of new-homebuyers) demonstrates some of the dangers of placing over reliance on higher densities and tall buildings in delivering the type of housing that is required in comparison with market expectations.<br><br>5.4 The Survey looked at three location categories – high density urban markets, medium high-density urban markets and suburban/urban fringe markets. High density urban markets not surprisingly attracted a higher proportion of first-time buyers (but still only 29%) and only 30% of the properties were apartments. In medium density urban markets 16% were apartments and in suburban/urban fringe markets 36% of Respondents were family buyers and therefore sought larger homes with 53% of the properties here 4 or more bedrooms. Whilst the Survey supports some of the principles of the Urban Living Document (people prioritise being close to a station, which will be difficult to achieve in South Gloucestershire, and being able to walk to amenities in high density urban markets), even then 47% of buyers have two or more cars (together with 60% in the suburban areas), confirming our Comments below that the guidance needs to address the realities of car ownership. In addition, off street parking was the top priority for up-sizers and re-locaters. |

5.5 Overall purchaser's top seven priorities include off street parking and size and design of living space, which need to be taken account of in constructing the appropriate Policy approach in response to market requirements.

5.6 The final conclusion of the research is that *'Help to Buy stands out in the Survey as crucially important to first-time buyers, highlighting how rapidly supported Policy and initiatives can impact on the market.'* The same principle should be applied to ensure the Policy and guidance contained in the South Gloucestershire Local Plan, has a similar positive effect.

Bristol City Urban Living SPD:

5.7 Bristol City Council recently Consulted on an Urban Living SPD. That picked out a number of key learning points which we consider will apply equally in South Gloucestershire. These are:

- It is *'difficult to attract families to the larger City Centre apartments and conversely apartments created in suburban areas predominantly for single people have attracted families looking for affordable accommodation.'*

- *'There is a fear that higher density buildings attract a more transient community' and this also restricts the attractiveness of these schemes for families.*

- That *'none of the flatted schemes provided on site provision for children's play.'*

- Schemes are failing to deliver mixed and balanced communities and the amount of Affordable Housing required and there needs to be flexibility in the types of Affordable Housing required. There is a clear message here that the Council needs to take on board in delivering its Urban Living Agenda.

- Car/cycle parking basements are not viable in urban and suburban areas and the recognition that where car parking requirements have been reduced there have been impacts on surrounding streets is identified as a problem but no solutions are suggested.

- In the suburban context schemes tend to be three storey and three to seven storeys in the urban context. Clearly height will be limited by what is considered acceptable in terms of visual impact and this has to be accessed on a site by site basis and there cannot be an overriding assumption that taller buildings or higher density can be achieved in every circumstance. Viability is also an issue and, for example, lifts will not be appropriate in a suburban context for these reasons and this will effectively limit storey heights to a maximum of three. Therefore it is important for the Council to consider how three storey developments can address increased density issues and form the basis of the Council's approach.

Focus Going Forward:

5.8 Paragraph 2.26 of the Consultation Document identifies potential ways forward. One of these involves identifying key sites for change. This can create problems in the urban area, in particular the impact on existing uses on these sites and knock on impacts on adjoining properties. PHSV have carried out regular site searches of parts of the urban area and these have been demonstrated how difficult it can be to identify potential opportunities in advance. Therefore we suggest that rather than identifying specific key sites, the Council should consider using a Criteria-based Policy, which would enable any site to come forward for development in accordance with the criteria.

**6. Urban Localities:**

North Fringe Cluster:

6.1 PHSV welcome the continuing emphasis on the Cribbs Patchway New Neighbourhood and the commitment to increasing numbers of houses. PHSV are committed to delivering land at Fishpool Hill as soon as the legal issues relating to the land are resolved. However, we consider there would be difficulties retrofitting a heat network on the land given the existing Planning Permission, without adding further substantial delays to the delivery of this land.

Yate:

6.2 The *'whole town'* approach proposed for Yate needs to be extended to a 'whole urban area' approach for the Yate Chipping Sodbury urban area and continue the approach of the Core Strategy which considers both towns together. The Core Strategy says 'the key strengths of both towns are:

- The strong sense of identity and cohesion within the existing communities;

- Accessibility – Yate has a railway station and there are bus services to rural areas and nearby urban centres;

- Access to a good range of services and facilities, and most are centrally located;

- Chipping Sodbury has a lively evening and vibrant daytime economy;

- Good walking and cycling routes within the towns, which link to the countryside, such as the Frome Valley Walkway. Open spaces within and adjoining the towns help to define their character;

- Chipping Sodbury's Conservation Area, heritage sites in Yate, and the landscape setting provide high quality environments;

- Good levels of educational attainment and low rates of crime;

- They perform independently of the nearby cities, due to the range of services and facilities available.

| | |
|---|---|
| | 6.3 It further says future growth must address identified issues and *'reflect and enhance the two towns' distinct yet complementary character and roles, provide opportunities to increase self containment and protect and enhance the identities of the towns.'*<br><br>6.4 As a consequence PHSV have the following Comments on a potential sustainable urban extension on land to the East of Chipping Sodbury. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Baylis Estates Ltd |
| **Comment ID** | 19740609/2157 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | Urban Localities – North Fringe Cluster, Cribbs Causeway, Patchway and Filton Airfield Key Challenges (Page 34)<br><br>**Question 2.1 Do you have any Comments on the opportunities and challenges identified for the Localities?**<br><br>We agree that a key challenge for the Airfield development is successfully integrating new development with Cribbs Causeway. However, Land South of Merlin Road is a key opportunity to respond to this challenge and contribute to successful connectivity between planned new development on the Airfield and Cribbs Causeway. Therefore, it is essential that Land South of Merlin Road is identified as a development site to support integration of these uses.<br><br>The current proposals include key strategic connections for pedestrian and cycle linkages between the Airfield and the Cribbs Causeway commercial area. In addition, a key objective of the proposed development is to deliver a new ice rink at Cribbs Causeway. The ice rink will be an inclusive community facility that provides education, entertainment and leisure activities for a wide range of local people. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Crest Strategic Projects & Crest Nicholson (South West) Limited |
| **Comment ID** | 20274273/2169 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | 4) It is not clear why elements of the Core Strategy allocations at both East of Harry Stoke and CPNN have been excluded from the 'urban living opportunity areas' (Map 2, Map 3 and North Fringe Cluster Map).<br><br>5) In the case of the Harry Stoke area, there is no logic for the land South of the railway line/North of the A4174 that falls within the 2,000 homes Policy CS27 allocation to be excluded. The 1,200 homes Consented at Harry Stoke (only 166 of which have been built) and the part of the CS27 allocation that falls North of the railway is included; it makes no sense to exclude the area that has been.<br><br>6) The land South of the railway is far better equipped to explore urban living opportunities than the North. The North is the subject of a hybrid Planning Application for 327 homes inclusive of a detailed scheme for 150. This will be built out immediately and works are due to commence in the Summer. The land is subject to an Earthworks Strategy to enable the delivery of that quantum of housing and there is very limited scope to increase densities further.<br><br>7) The same cannot be said of the land to the South that is subject to an Outline Application for 1,290. Whilst Planning Permission is anticipated in Summer 2018 and Reserved Matters will follow shortly thereafter it does not obviate the opportunity to consider how urban living opportunities be facilitated through an alternative approach. The same applies to Harry Stoke where whilst Reserved Matters have been submitted, it does not rule out the opportunity to reconsider.<br><br>8) The A4174 Ring Road frontage represents the most likely opportunity for 'densification,' whether that be through increased height, density, or different forms of accommodation such as PRS. CSP is already seeking to provide a tall building (max 10 storeys) within the local centre and there is scope to consider more along the frontage, both at Harry Stoke and East of Harry Stoke. Crest is keen to understand and pursue the market for Build to Rent in this highly accessible location and are keen to discuss an evolving model with Officers at the appropriate time. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ashfield Land |
| **Comment ID** | 16658689/2275 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | **Urban Living:**<br><br>4.54 It is apparent from the text of the NLP Consultation Document that a great deal of emphasis is being placed on this form of housing supply in order for SGC to meet even its relatively low housing requirements set out in the Draft JSP. This results in the provision of 2,900 dwellings coming forward as part of this Urban Intensification Strategy.<br><br>4.55 Whilst we agree with the assertion that Brownfield development and urban intensification has many benefits and should be prioritised, a mix in the types of allocated land is necessary to ensure that the best chance of achieving housing delivery can occur. |

4.56 We believe that this is alluded to within the new Local Plan Consultation Document which states in Paragraph 2.52 that *'The Council is also mindful of the need to create a portfolio of sites across the District, including a wide range of smaller sites…'* If that is what SGC are suggesting, we strongly support the proposal that the NLP delivers a wider portfolio of housing land supply.

4.57 Limiting supply predominately to Brownfield and intensification opportunities within existing urban areas would mean that downturns in the market could exacerbate supply issues, because marginally viable Brownfield sites would be the first to be halted in a difficult economic climate. Additionally, the developers of such sites, often quite rightly, present viability cases to show that delivering Policy compliant Affordable Housing on complex Brownfield sites is unavoidable. This has clearly taken place in the West of England already where only 27% of the housing delivered in South Gloucestershire has been affordable, compared to current targets of 35% set out in the Core Strategy.

4.58 Having a range of size and types of sites will help avoid such severe restrictions on supply and this should be acknowledged within the new Local Plan. Greenfield land is almost exclusively less constrained than Brownfield land and development costs are usually lower. Therefore, developers are far more likely to be able to deliver Policy compliant levels of Affordable Housing and are able to contribute to other infrastructure provisions. Furthermore, it is our experience that site preparation works are often less time consuming and complex on Greenfield sites when compared to Brownfield.

4.59 We estimate that after completions of the planned sites from the Core Strategy, approximately 30% of the overall housing requirements will be delivered from Brownfield sites. These are new allocations that follow those already allocated in the Core Strategy, of which a large proportion were on Brownfield land such as the Airfield and other previously developed sites in the Northern Fringe. We consider that, because the Core Strategy approach failed to deliver the housing need required since 2006, too much reliance is again being placed on Brownfield redevelopment opportunities particularly where there is no clear evidence associated with these figures or that sites are available for development.

4.60 We also have concerns regarding the quantum of development that SGC are envisaging coming forward as part of the Urban Living supply component – this is currently anticipated to yield 2,900 dwellings. As part of our JSP Representations we cited that in the Bristol area delivery on previously developed land has been accelerated in recent years because of Permitted Development Rights associated with the conversion of offices, warehouses and other uses to residential. This form of supply will not be able to continue delivering such a trajectory because the supply of them is finite and evidence in respect to the number of Prior Notifications being submitted suggests they are falling in number, as underused office and other space has generally already been converted and rising office rental rates are making such conversions less financially attractive.

4.61 The Urban Living Topic Paper (ULTP) that formed part of the JSP Evidence Base identified that in SGC delivery from windfall sites greater than 10 units in size has averaged 150 per year, equating to a potential 3,000 over the 20-year Plan Period.

4.62 However, using this average in our view is risky because there is no certainty that this rate of delivery will continue in the future. In fact, the only certainty is provided by the SHLAA analysis that sets out (see Pages 6 and 8 of the ULTP) that 1,300 dwellings are likely to come forward on previously developed land. Therefore, in our view, the Urban Living capacity for SGC should be reduced to 1,300 dwellings over the Plan Period with a corresponding adjustment to the number of SDL and NSDLs being considered.

4.63 In light of these considerations we consider that a mixture of sites and options for growth should be provided for in the JSP to ensure a wide-ranging portfolio of land, to include a balance between Brownfield and Greenfield land which can ensure that as far as possible, Policy compliant levels of Affordable Housing are delivered. This will encourage competition and flexibility in the market which is a key requirement of the NPPF.

***Q2. Urban Localities:***

***2.1 Do you have any Comments on the opportunities and challenges identified for the Localities? (please state which locality when responding).***

8.9 Notwithstanding the concerns identified in relation to Question 1 we have limited Comments to make on the various localities identified. Our limited specific Comments include the following:

***North Fringe Cluster:***

8.10 The NLP refers to the potential to increase the number of dwellings to be delivered on the Core Strategy allocations for this area. However, the large majority of these allocations are either under construction or have been granted Planning Permission after many years of discussion. For example, the YTL Outline Application for the former Airfield has only just received Planning Permission at the start of March 2018. This followed Permission for 1,100 dwellings on Land to the South of the Airfield, construction of which has already commenced.

8.11 The YTL proposals include densities of up to 150 dwellings per hectare and an overall quantum of residential development of 2,675 dwellings. Bristol City Council raised significant concerns relating to this Application's impact on the regional highways network and this requires further mitigation and testing as part of future Reserved Matters Applications to avoid adverse impacts on the A38 and A4018. Increasing the densities on sites such as these will lead to further concerns as they are already high in comparison to even the Central City area.

8.12 The existing permitted sites are also being progressed towards commencement of development stage and leveraging additional numbers, which will require new Planning Applications and associated EIAs will delay this. Therefore, we would ask the Council to provide evidence that the developers involved are willing to delay commencing works to allow further consideration of higher densities on their various sites before any firm allowance can be made for additional housing numbers in this area.

8.13 These issues underline the fact that obtaining additional housing numbers from these existing commitments will be challenging and potentially unrealistic. Without being provided with the evidence from the Nash Report previously referenced to it is very difficult to come to a firm conclusion on this matter.

***Yate:***

8.14 The focus of change proposed as part of the NLP Consultation Draft is through an identified Regeneration Zone running from the railway station to the Shopping Centre, and the Western "gateway sites."

| | |
|---|---|
| | 8.15 This follows the identified JSP Vision for the North West Yate SDL which seeks to *'Provide a new high quality, high density, mixed-use residential neighbourhood that connects to a regenerated rail station and Beeches Industrial Estate,'* which we agree is a suitable option for growth. Figure 4 below identifies the areas being considered for regeneration.<br><br>*Figure 4: JSP Yate Concept Diagram*<br><br>Please see the attached Document for Figure 4 which is referenced above.<br><br>8.16 The Beeches Industrial Estate provides a high number of existing employment uses, the majority of which are currently occupied and well utilised. An investigation of the Planning History of this area suggests that many of the units have been subject to recent improvements and extensions which evidences vibrant business use.<br><br>8.17 The ownership of the area is also fragmented which means land assembly to ensure comprehensive regeneration will be challenging.<br><br>8.18 Many of the units that make up the estate are large scale industrial and other uses that emit relatively high levels of noise alongside significant HGV movements. This means that any wider regeneration to the Estate to provide housing can only practically come forward if all owners agree to such a proposal, or the Council employ their powers of Compulsory Purchase. In our view, achieving this will be complex which makes any housing yields from this part of Yate highly uncertain.<br><br>8.19 No evidence is provided within the JSP or new Local Plan that sets out what is proposed for this large employment area other than its allocation as a 'Regeneration Zone,' including the viability for it to be delivered as such. Proposals to provide mixed-use accommodation within this area would result in the displacement of a high number of employment uses that employ a large number of people, because of amenity conflict with residential properties.<br><br>8.20 In the absence of a clear Strategy for where these would be located, and a Business Plan to identify how such a relocation is financially viable, the assumption would be that many of these uses would be lost from the area. It is also not clear whether these existing uses and companies would be willing to relocate/rationalise themselves within this new Zone.<br><br>8.21 In light of these concerns we consider that the housing supply from urban regeneration in this part of Yate is highly uncertain and cannot be relied on at this stage. |
| **Attached documents** | Ashfield Land - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (30.0 MB) |

| | |
|---|---|
| **Respondent Name** | Fortannia Ltd |
| **Comment ID** | 19741217/2320 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | ***2.1 Do you have any Comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding)***<br><br>The challenges identified at each of the sites are identical – the timely delivery of new homes as projected. It is recognised (and notably within the Draft NPPF March 2018) that larger strategic development sites can take longer to bring forward than smaller sites. Reasons include on and off-site infrastructure delivery perhaps associated with construction phasing/agreements; developer delivery projections; and local market demand.<br><br>Slow progress in respect of the delivery of large sites is evidenced in South Gloucestershire by the protracted delivery of Emersons Green East for mixed development and the timescales associated with the planning and development across Filton.<br><br>Paragraph 2.9 of the Consultation SGLP advises that its Strategy will deliver 'smaller scale development across the rural areas.' So far as can be seen from the Draft SGLP, there are no clear indicators as to how this will be achieved effectively. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | K. Bell |
| **Comment ID** | 19832353/2338 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | To whom it may concern,<br><br>As a local Councillor and local resident, I would like to object to the sites that have been nominated for development in Hanham Abbots.<br><br>I would like to object to the use of green sites being used before all brown sites in the area have been thoroughly investigated. We have many available brown sites in the Hanham and Kingswood area that would be more suitable for example the old Kleeneze site.<br><br>We have had a lot of recent development within the area, Hanham Hall, Gover Road, Whittucks Road, Abbots Road, Court Farm Road, Mount Pleasant Farm, just to name a few. I do not understand why these recent developments are not included within the quota? |

| | |
|---|---|
| | I do understand that small Affordable Housing is needed throughout South Glos, but I strongly feel that sites nominated in the Hanham Abbots area are not fit for purpose. They are not near to local facilities such as bus routes, Schools, shops, Doctors, without transport which would then lead to congestion on the small roads which are already at full capacity, and each house would have to have parking allotted to it, using more of our precious Green Belt.<br><br>We have such lovely green areas in Hanham Abbots, which are enjoyed by people from all over the area. I have noticed that people travel to enjoy the surrounding areas. I would hate to think that we would lose our Green Belt. I would just like to ensure that Green Spaces and the Conservation Area are protected for generations to come. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Redrow Homes South West, Julia Wallington, Debra Turner, Andrew Williams, Chr... |
| **Comment ID** | 20167105/2341 |
| **Document Part Name** | Question 02.1 Do you have any comments on the opportunities and challenges identified for the Localities? (Please state which locality when responding) |
| **Comment** | 8.9 Notwithstanding the concerns identified in relation to Question 1 we have limited Comments to make on the various localities identified. Our limited specific Comments include the following:<br><br>***North Fringe Cluster:***<br><br>8.10 The NLP refers to the potential to increase the numbers of dwellings to be delivered on the Core Strategy allocations for this area. However, the large majority of these allocations are either under construction or have been granted Planning Permission after many years of discussion. For example, the YTL Outline Application for the former Airfield has only just received Planning Permission at the start of March 2018. This followed Permission for 1,100 dwellings on land to the South of the Airfield, construction of which has already commenced.<br><br>8.11 The YTL proposals include densities up to 150 dwellings per hectare and an overall quantum of residential development of 2,675 dwellings. Bristol City Council raised significant concerns relating to this Application's impact on the regional Highways Network and this requires further mitigation and testing as part of future Reserved Matters Application to avoid adverse impacts on the A38 and A4018. Increasing the densities on sites such as these will lead to further concerns as they are already high in comparison to even the central city area.<br><br>8.12 The existing permitted sites are also being progressed towards commencement of development stage and leveraging additional numbers, which will require new Planning Applications and associated EIAs will delay this. Therefore, we would ask the Council to provide evidence that the developers involved are willing to delay commencing works to allow further consideration of higher densities on their various sites before any firm allowance can be made for additional housing numbers in this area.<br><br>8.13 These issues underline the fact that obtaining additional housing numbers from these existing commitments will be challenging and potentially unrealistic. Without being provided with the evidence from the Nash Report previously referenced it is very difficult to come to a firm conclusion on this matter.<br><br>***Yate:***<br><br>8.14 The focus of change proposed as part of the NLP Consultation Draft is through an identified Regeneration Zone running from the railway station to the Shopping Centre, and the Western "gateway sites."<br><br>8.15 This follows the identified JSP Vision for the North West Yate SDL which seeks to 'provide a new high quality, high density, mixed-use residential neighbourhood that connects to a regenerated rail station and Beeches Industrial Estate,' which we agree is a suitable option for growth. Figure 4 below identifies the areas being considered for regeneration.<br><br>*Figure 4: JSP Yate Concept Diagram*<br><br>Please see the attached Document for Figure 4 which is referenced above.<br><br>8.16 The Beeches Industrial Estate provides a high number of existing employment uses, the majority of which are currently occupied and well utilised. An investigation of the Planning History of this area suggests that many of the units have been subject to recent improvements and extension which evidences vibrant business use.<br><br>8.17 The ownership of the area is also fragmented which means land assembly to ensure comprehensive regeneration will be challenging.<br><br>8.18 Many of the units that make up the Estate are large scale industrial and other uses that emit relatively high levels of noise alongside significant HGV movements. This means that any wider regeneration to the Estate to provide housing can only practically come forward if all owners agree to such a proposal, or the Council employ their powers of Compulsory Purchase. In our view, achieving this will be complex which makes any housing yields from this part of Yate highly uncertain.<br><br>8.19 No evidence is provided within the JSP or new Local Plan that sets out what is proposed for this large employment area other than its allocation as a 'Regeneration Zone,' and indeed the viability for it to be delivered as such. Proposals to provide mixed-use accommodation within this area would involve the displacement of a high number of employment uses that employ a large number of people because of amenity conflict with residential properties.<br><br>8.20 In the absence of a clear Strategy for where these would be located, and a Business Plan to identify how such a relocation is financially viable, the assumption would be that many of these uses would be lost from the area. It is also not clear whether these existing uses and companies would be willing to relocate/rationalise themselves within this new zone. |

| | |
|---|---|
| | 8.21 In light of these concerns we consider that the housing supply from urban regeneration in this part of Yate is highly uncertain and cannot be relied on at this stage. |
| **Attached documents** | Redrow Homes South West and Others - Grass Roots Planning (Mr. Matthew Kendrick).pdf (7.2 MB) |

| | |
|---|---|
| **Respondent Name** | Damien McBraida |
| **Comment ID** | 3973217/4 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | The huge and impressive Brabazon Hanger on the Filton Airfield site is an important part of Filton's aviation history and a local landmark so it should be preserved. This will need a new use to be found for it. A conversion to become the new Bristol Concert Arena seems an excellent suggestion provided that the necessary new transport links are provided before it opens. These need to be both road and rail to prevent transport chaos. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mr. Hawthorn |
| **Comment ID** | 14671265/78 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | Hanham - As has been identified the former Kleeneze site is an obvious candidate for this. Beyond that there are limited options that would enable Hanham to retain its sense of village character. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Claire Normoyle |
| **Comment ID** | 7883105/109 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | No Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tamzen Bury |
| **Comment ID** | 19416385/116 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | Please see other Comment submitted. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anne Gale |
| **Comment ID** | 16344321/121 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | Brownfield sites ONLY. There are plenty. AND, what about the site of Soundwell College? A big site ready for housing with good amenities. Plus, the site on Station Road next to the Driving School and opposite the School which has been bulldozed to the ground. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Thompson |
| **Comment ID** | 17795873/162 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | I am not aware of any particular sites but I am sure there are plenty in the localities identified. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tamzen Bury |
| **Comment ID** | 19416385/210 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |

| | |
|---|---|
| **Comment** | The Kleeneze site in Hanham would be preferential to building on the Green Belt sites proposed in Hanham. The Kleeneze site is already developed, has easy access to the High Street, and it would bring more custom to the shops, cafes and restaurants in Hanham, without the need for people to use their cars. In general Brownfield sites should be used where possible, instead of Green Belt areas, as Brownfield sites are likely to have good access to main roads and are already developed. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Lesley Brown |
| **Comment ID** | 16384673/287 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | There would seem to be a good opportunity to build in the Pilning and Easter Compton areas. I gather that work is being done on Flood Defences. The area is well served by local facilities at Cribbs Causeway as well as being near to the Motorway Network and also the new Severn Beach rail services. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Vince Robertson |
| **Comment ID** | 17798689/297 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | I wish to lend my support to the Comments and views expressed by TRAPP'D. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Hicks - Falfield Action Group |
| **Comment ID** | 16618369/300 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | No. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kit Stokes - Stokes Morgan Planning Ltd |
| **Comment ID** | 19451073/386 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | We act for a landowner at Lyde Green ( ). The site is 7 hectares of land that is not in the Green Belt and in Flood Zone 1 as shown in the attached Plan.<br><br>The land is designated as the Rosary SNCI but has been heavily grazed for years. Ecology Surveys reveal the site to have no valuable habitat and recommendations are that safeguarded buffers on the margins of the site could be improved to enhance the overall value of the site whilst delivering between 180 and 250 houses.<br><br>This SNCI designation should be reviewed. It doesn't seem to have been informed by Surveys just carried over from one Local Plan to the next. This land adjoins the new neighbourhood and must be sequentially preferable to releasing Green Belt or Greenfield land in less accessible locations. |
| **Attached documents** | 180430 call for sites letter KS Lyde Green.pdf (429 KB)<br>Screen Shot from SGC Map.JPG (208 KB)<br>LYDE GREEN GE Plan April 2018.pdf (1.3 MB) |

| | |
|---|---|
| **Respondent Name** | Alveston, Rudgeway, and Earthcott Parish Council |
| **Comment ID** | 19784545/430 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | **No** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Eileen Trace |
| **Comment ID** | 19809057/497 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |

| | |
|---|---|
| **Comment** | I fully understand that houses are desperately needed, particularly low-cost housing for people needing 'Starter Homes.' But I would ask that Planners consider using areas such as the old Kleeneze Factory site first of all. After all, houses built on or near green spaces will certainly NOT be low-cost homes. Secondly, if building is allowed on some green spaces, it will surely follow that more housing will be granted to be built on the Hanham Hills, and then perhaps between Hanham and Bitton. We need these green spaces between towns and villages; they are necessary'lungs' for those living here now and those moving into the area in the future. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alison and David Smith |
| **Comment ID** | 19809185/498 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | As residents of , we do not object to development locally as we understand the need for more Affordable Housing. However, we strongly object to building on our beautiful green spaces when there are suitable Brownfield sites available e.g. the old Kleeneze site. These green spaces and the Conservation Area need to be preserved for generations to come. They are well used by walkers, cyclists and horseriders, and provide a tranquil oasis on the outskirts of a busy city. They are rich in diverse vegetation and wildlife, with many different species of birds, bats, badgers, deer etc.<br><br>We desperately need the open green spaces in Hanham to protect & enhance the environment to the benefit of residents and visitors alike. Developments such as Hanham Edge risk destroying the delicate eco-system we currently enjoy, let alone that which the area had before the fields were cleared in a very sudden and abrupt way five or so years ago. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alan Jones - Hanham District Green Belt Conservation Society |
| **Comment ID** | 17236353/501 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | We accept the description of Hanham within the Local Plan Document, but can see no reason why it has to 'build on its qualities …' by being developed!!<br><br>We accept that the area is quite possibly an aspirational place to live, and consider that Hanham and the immediate areas embody much of the ethos of the Plan Document for improved opportunities for walking, cycling and enjoyment of the countryside and therefore ….Why does it need to be altered with loss of one of our main assets - our countryside!!<br><br>We note that the council is investigating how to widen ways in which new development is delivered. Why then during the past 10 years, have they failed to take a role in the development of the Kleeneze/Tesco site??<br><br>The disused Kleeneze Factory site, between Anstey's Road/Martin's Road/New Walk, Hanham - an area of 5.75 acres, has definite development potential. We consider that the development of this site for housing, is the ideal use for the derelict area.<br><br>With imaginative design, we as a Society consider that the housing provision on this site could provide the ideal mix of accommodation, able to provide just the homes required for today's purchasers and renters, in a location close to amenities and transport links. Development of this site ought to alleviate the necessity to build on the surrounding Green Belt areas.<br><br>The statement (Page 44 - Key Opportunities, Para 4) That the Council could involve itself in 'land assembly' is pure imagination. To date, there has been no evidence of any initiatives from SGC. The Paragraph continues with a statement that the Council could use its own land assets - as far as we are aware they have none in the greater Hanham area!<br><br>Where is the desire to address the housing situation by using SGC initiatives to provide Local Authority Housing??<br><br>The Housing demand figures in the JSP have been challenged as being far too optimistic, and contains arithmetical errors. The projection is based on the economic forecasts from September 2015, which assumed a 'medium-high' growth in GVA. We now know that the growth figures have been downgraded by The Office of Budget Responsibility in 2017. The housing requirements in the Local Plan are therefore excessive, in view of the current economic situation and the housing demand projections should be reduced to new, realistic numbers.<br><br>Throughout the Document, no additional measures, to address the problem of 'Affordable Homes' have been stated. In addition, no consideration has been taken of the mixed tenure requirements of the accommodation currently needed, especially rented units for young employed persons, unable to afford deposits to enable them to own their own homes. SGC's own Core Policy recognised in 2007 that the proportion of younger households able to buy or rent at market rates had fallen to 45.30% and the situation has got much worse since then.<br><br>The fundamental danger is that without enforceable definition and policing of the delivery of truly Affordable Homes, the result will be, as currently experienced - that any initial aspirations to provide reasonable percentages of affordable accommodation, will be whittled down to meaningless levels. |

| | |
|---|---|
| | We can see no reasons for development of the surrounding Green Belt areas when there is a redundant factory site in an ideal location just waiting for development - we must develop Brownfield sites first!! |
| **Attached documents** | Hanham District Green Belt Conservation Society (Alan Jones).pdf (20.3 MB) |

| | |
|---|---|
| **Respondent Name** | Roy Crew |
| **Comment ID** | 3973121/530 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | My Responses to the specific Local Plan Questions:<br><br>Question 2:<br><br>The only land in the Hanham area is the derelict Kleeneze site. There is not a large amount of employment in the area, so even people living here would have to commute increasing pollution levels. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Toby Wenham - LaSalle Investment Management |
| **Comment ID** | 19809377/548 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | Question 2:<br><br>In the first instance, LaSalle fully supports the Council's Spatial Strategy which facilitates additional residential and mixed-use growth within the CPNN, over and above that identified in Core Strategy Policy CS26, to meet its ambitious borough-wide target of 32,500 homes between 2018 and 2036, as dictated by the Joint Spatial Plan.<br><br>Further to the Council's Spatial Strategy, Patchway Trading Estate is identified in the NSGLP as falling within the wider 'Northern Fringe Cluster', which is identified at Paragraph 2.22 as being "*an area offering the opportunity for a change in approach.*" In practical terms for Patchway Trading Estate, this new approach encourages, inter alia, "*the redevelopment of underused land and buildings to enhance existing employment sites, as well as some changes of use from land which is currently safeguarded for businesses uses to mixed use or just residential use."*<br><br>LaSalle supports the Council's approach in recognising the potential of 'Safeguarded Employment Areas,' like Patchway Trading Estate, to provide mixed-use or residential development in the future. However, it is LaSalle's aspiration to protect the existing employment uses at Patchway Trading Estate in the short term (as some units have been re-let to new businesses on short leases), while it develops its medium-long term strategy to redevelop the site for a residential/mixed-use scheme in line with achieving the Council's vision for the wider CPNN.<br><br>Core Strategy Policy CS12 already seeks to protect the existing employment uses at Patchway Trading Estate (within B1, B2 and B8) in the short-term until a more fundamental review of its long term strategy is undertaken in the line with achieving the objectives of Core Strategy Policy CS26, for the wider redevelopment of the CPNN. Therefore, Core Strategy Policy CS12 already provides a suitable basis to meet LaSalle's short, medium, and long term aspirations for Patchway Trading Estate, so it is respectfully requested that its objectives are taken forward into the New Local Plan. |
| **Attached documents** | LaSalle Investment Management (Mr. Toby Wenham) - JLL (Mr. Alex Rogerson).pdf (209 KB) |

| | |
|---|---|
| **Respondent Name** | Allison Willis & Mark Willis |
| **Comment ID** | 19809601/564 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | Dear Sirs,<br><br>We are writing to voice strong objections to the proposed plans to develop the following areas for residential building:<br><br>Hanham Hills<br><br>Wills Park, Gover Road<br><br>Hanham Cricket Club, Abbotts Road<br><br>Riverside Estate |

| | |
|---|---|
| | Our Objections are as follows:<br><br>We can not destroy these few remaining green and beautiful spaces. They are utilised and enjoyed daily by the local community.<br><br>Hanham's existing infrastructure and local amenities simply can not cope with a further influx of the proposed numbers of people.<br><br>These sit within a Conservation Area which must be protected for future generations.<br><br>The old Kleenezee site should be redeveloped before destroying green spaces. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Janet Sheppard |
| **Comment ID** | 19809633/566 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | Dear Sirs,<br><br>We are writing to voice strong objections to the proposed plans to develop the following areas for residential building:<br><br>Hanham Hills<br><br>Wills Park, Gover Road<br><br>Hanham Cricket Club, Abbotts Road<br><br>Riverside Estate<br><br>Our Objections are as follows:<br><br>We can not destroy these few remaining green and beautiful spaces. They are utilised and enjoyed daily by the local community.<br><br>Hanham's existing infrastructure and local amenities simply can not cope with a further influx of the proposed numbers of people.<br><br>These sit within a Conservation Area which must be protected for future generations.<br><br>The old Kleenezee site should be redeveloped before destroying green spaces. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kirsty Jones |
| **Comment ID** | 19832001/644 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | Dear Sir/Madam,<br><br>I am writing this email in objection to the proposed development sites situated in Hanham and Willsbridge. I understand the need for extra housing in the area but object whole heartedly to our Green Belt and open spaces being used for this purpose. The Kleeneze site in Hanham would be ideal for development as it currently sits empty, already has road infrastructure, and development would improve the current area etc. Why are we destroying our invaluable green spaces when there are so many redundant spaces like the Kleeneze sight which could and should be utilised?<br><br>My partner and myself have worked hard to buy our dream house in , which we bought partly due to the proximity of the beautiful open spaces and we would be devastated if these areas were built on. |

| | |
|---|---|
| | I thank you for taking the time to read my email. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Zoe Hancock - Bristol Avon Catchment Partnership |
| **Comment ID** | 19832225/674 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | No additional Comments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Chelverton Developments Ltd |
| **Comment ID** | 16478625/731 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | Q2 – Urban Locations (Yate):<br><br>Chelverton supports the Council's intention to adopt a 'whole town' approach to regeneration and development at Yate. This is important because of the range of sustainable development opportunities in the town arising from its identification as a 'Strategic Development Location' (SDL), the scope to regenerate Brownfield sites through an 'urban living' approach, and given the scope for non-strategic development elsewhere at accessible locations within the town and at its edge.<br><br>Regarding the latter, Chelverton is promoting the development of land straddling the Yate/Chipping Sodbury Ward Boundary (Site Ref: SG65: Land at Barnhill, Sodbury) where there is scope to provide up to 200 new houses at a highly-accessible urban edge location. This site can make a valuable short-term contribution to meeting housing needs, in advance of likely implementation of the Yate SDL. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | James Carpenter - Falfield Parish Council |
| **Comment ID** | 16617825/738 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | Not applicable. |
| **Attached documents** | Falfield Parish Council (Mr. James Carpenter).pdf (1.9 MB) |

| | |
|---|---|
| **Respondent Name** | Heather Elgar - West of England Nature Partnership |
| **Comment ID** | 19839553/786 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | Please find below Comments from the West of England Nature Partnership (WENP) in response to the South Gloucestershire Local Plan Consultation.<br><br>For transparency, please know that Dominic Mellon (Consultant in Public Health for South Gloucestershire Council) sits on the WENP Board and thus note a declared conflict of interests. This Response reflects the aims and objectives of the Partnership and does not reflect views of individual Board members.<br><br>Question 2: Urban Localities:<br><br>No Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Neil R. Higgs |
| **Comment ID** | 401345/928 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | I would also support the prioritisation to the redevelopment of Brownfield sites (in line with overarching national and local Planning and Sustainability Policies) at the former Kleeneze Brownfield site at Martins Road, Hanham – Qn 2.2. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Robert E. Eales |
| **Comment ID** | 19883265/932 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | I would also support the prioritisation to the redevelopment of Brownfield sites at the former Kleeneze site at Martins Road, Hanham. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Claire Dolman - Hanham Abbots Parish Council |
| **Comment ID** | 1060929/934 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | Please see below my Council's Response to the Draft Local Plan 2018 - 2036 and how it will affect Hanham, in particular.<br><br>We note that one of the main challenges is to 'protect the area's undeveloped open spaces and give careful consideration as to how any Brownfield sites should be used....' Hanham Abbots Parish Council welcomes the development of the former Kleeneze site and would like to see truly Affordable Housing being built here to attract first time buyers and older people looking to downsize. The same applies for the proposed development at Greenbank Road. We would expect robust controls on developers to deliver this type of housing. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Cate Davidson - Sodbury Town Council |
| **Comment ID** | 4877793/1005 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | Dear Planning Team,<br><br>Sodbury Town Council responds as follows to the Local Plan (non strategic) Consultation:<br><br>Q. 2 There are no potential sites suitable for redevelopment in this area.<br><br>Please note the Comments as appropriate. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Clifton Homes Ltd |
| **Comment ID** | 16617921/1080 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | **Please see submitted Representations.** |
| **Attached documents** | Clifton Homes Ltd - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (1.7 MB) |

| | |
|---|---|
| **Respondent Name** | South West Strategic Development and Ian and David Knipe |
| **Comment ID** | 19884577/1104 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | Please see submitted Representations. |
| **Attached documents** | SW Strategic Development and I. and D. Knipe - Grass Roots.pdf (27.4 MB) |

| | |
|---|---|
| **Respondent Name** | Progold Ltd |
| **Comment ID** | 19737665/1118 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | Please see submitted Representations. |
| **Attached documents** | Progold Ltd - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (7.9 MB) |

| | |
|---|---|
| **Respondent Name** | BAE Systems Pension Funds Trustees Ltd |
| **Comment ID** | 19738113/1171 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |

| | |
|---|---|
| **Comment** | The site at Filton 20 Business Park is considered to align with the third Bullet Point of Paragraph 2.26 of the Plan, whereby it is an existing employment site that could be re-designated to provide a mix of uses including new or improved business premises along with new homes or student accommodation by way of example. As per the site deliverability section of this letter, the site has the potential to achieve a greater mix and density of uses in the latter years of the Plan Period. This is in accordance with the Urban Living objective of making best use of previously developed land in accessible and sustainable locations. A Call for Sites Submission for the Filton 20 Business Park has been submitted. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | D. P. Wardle |
| **Comment ID** | 19836961/1193 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | There is a large disused ‘Kleeneze’ site in Hanham which is frankly an eyesore and is ripe for development as a Housing Estate. There was a rumour of Tesco showing interest, but another supermarket is certainly not required. Housing clearly, is, so this site would be far more suitable than the proposed Hanham Abbots site. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Lidl UK GmbH |
| **Comment ID** | 20050593/1211 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | Each of the urban localities in South Gloucestershire has their own character and offer specific opportunities for the future. One of the key opportunities for the Cribbs Causeway, Patchway and Filton Airfield area is the amount of land that has been identified for growth but is yet to be delivered. This provides the Council with a unique opportunity to ensure that the amount and type of development delivered on these sites is appropriate, both in the short and long-term.<br><br>Rethinking the approach to delivering undeveloped sites in Patchway offers the opportunity to enhance the quality of living, services and facilities currently present in the existing community and the planned redevelopment of the Airfield. Higher density development, and further growth beyond that currently planned in existing Planning Policy could enable a greater range of social, entertainment, leisure, employment development and public realm improvements.<br><br>It is considered that some sites identified within current Planning Policy for solely employment use represents an inefficient use of land in an area of significant growth and that sites should be identified for a more flexible range of uses to support the role and function of Patchway. A Sustainability Appraisal (SA) has not been published for Consultation, and therefore no Comments are made at this stage on the suitability of other sites within the North Fringe Cluster. It will be necessary to progress this in due course to inform the progress of the Local Plan.<br><br>However, specifically with regard to Lidl’s land interest at Plot E10, Northfield to the South of Hayes Way, the site is identified purely for employment use and has an extant Outline Planning Permission for office use as part of the Charlton Hayes development. Permission for employment use on this site and the adjacent plot of land was first granted in 2003 and yet this is still to be delivered by an interested party, despite being actively marketed for ten years by two Commercial Property Agents. The site has previously been associated with the operation of Filton Airfield and has therefore remained as a disused Brownfield site since its closure.<br><br>It is therefore strongly recommended that Plot E10 is considered for re-designation to allow a more flexible mix of uses on site and enable the delivery of employment uses alongside other complementary uses. Particularly, Lidl are interested in delivering a neighbourhood food store on the site and consider the proposal to be of significant benefit for the following reasons:<br><br>o As marketing evidence indicates, Northfield Park is not a qualitatively suitable employment location but does offer the opportunity of supplying the market for a variety of alternative, employment-generating uses, such as retail, necessary to serve the wider North Bristol residential and employment community.<br><br>o The prominent location of the site presents a unique opportunity to enhance the accessibility of this 'gateway' area, opening up connections into Filton Airfield. The site is also located between two major allocations for mixed use development, the Charlton Hayes development to the North and new Cribbs/Patchway neighbourhood area to the South. Both sites are allocated for a substantial quantum of residential units as well as employment and ancillary services uses. A mix of uses in this sustainable location will provide complimentary uses and services to benefit the surrounding area;<br><br>o A mix of uses on site, including retail, will also make a positive material contribution to the sustainable pattern of development in the North Fringe. Whilst supermarkets exist in the Cribbs Causeway area, the development of the site for a food store will provide a much more accessible location for residents of Patchway and Charlton Hayes, thus contributing to short trips and offering the opportunity for some local residents to walk to a food shop rather than having to use the private car;<br><br>o Within the local area, there is no suitable alternative provision for the proposed food store use which can be delivered within a reasonable period of time. There are no sequentially preferable, suitable, and available alternative opportunities and whilst the redevelopment of the Airfield will eventually deliver retail facilities, these facilities are some way away and will not meet the needs of Patchway and Charlton Hayes residents in the short to medium term.<br><br>o The proposed development will provide a range of job opportunities for the local population, providing a net addition to the range of employment opportunities in the area; and |

| | |
|---|---|
| | o Providing a flexible range of uses on the site would facilitate the future delivery of office use in this location due to the delivery of necessary infrastructure such as the access road and servicing.<br><br>If the site was to be identified for mixed-use development, the enclosed Indicative Site Layout demonstrates how these uses could be delivered side by side. Lidl submitted a Planning Application (Ref: PT17/5387/F) in November 2017 for the development of a neighbourhood food store in this location. From collaboratively working with South Gloucestershire Council, the proposed scheme has been revised to now include the safeguarding of two parcels of land on the site for future employment use. Lidl welcome the opportunity to deliver a mix of uses on this site and look forward to working with the Council to have a positive role in delivering sustainable growth in the North Fringe Cluster.<br><br>A Call for Sites Form has been submitted alongside this Representation and a summary of the description of the site is provided below.<br><br>Site and Surroundings:<br><br>The site extends to 1.23 hectares and is located on the very Northern part of the former Bristol Filton Airfield within a wider area comprising a mix of uses including commercial, retail, residential and leisure. It is bounded to the North by Hayes Way and Charlton Hayes, a significant large-scale residential led development.<br><br>To the East of the site is Gloucester Road, a Royal Mail Depot and a mix of commercial uses including Rolls Royce and the Avon & Somerset Constabulary. To the South of the site is the former Filton Airfield and to the West is Hayes Way, further Charlton Hayes development land and The Mall at Cribbs Causeway.<br><br>In terms of constraints, the site is located within Flood Risk Zone 1 (low risk). The site does not contain any statutory or locally Listed Buildings or structures and is not located within a designated Conservation Area. The closest Heritage Asset is located approximately 300m to the South West of the site and comprises the Grade II Listed Triple Hangar on the former Filton Airfield (Ref: 1391563).<br><br>The site can be accessed by vehicles and pedestrians via Hayes Way and the Concorde roundabout, which connects Hayes Way to Charlton Boulevard. For pedestrians and cyclists, there is an existing footway/cycleway on the South side of Hayes Way. In addition, it is understood that a number of extensions and improvements for cyclists and pedestrians to these routes are proposed as part of the significant development occurring at both Charlton Hayes and Filton Airfield, which will improve the pedestrian/cycle accessibility to the site even further.<br><br>For this reason and those detailed above this site should be considered for re-designation for a more flexible range of uses during the preparation of the next stage of the South Gloucestershire New Local Plan.<br><br>Conclusion:<br><br>It is recognised that future growth needs cannot be met using the approach taken by existing Planning Policy. Lidl supports the identification of a new approach to delivering sustainable growth in the urban areas of South Gloucestershire and in particular, the North Fringe Cluster. This includes the diversification of uses on sites which have historically been used or safeguarded purely for employment use, to support the role and function of Patchway.<br><br>It is recognised that as part of the New Local Plan preparation, it will be necessary to produce an up to date Evidence Base which supports the strategic objectives of the Development Plan and the West of England JSP. This will include the identification of some sites that would be appropriate for mixed-use development in the North Fringe Cluster. Plot E10, Northfield Park in Patchway provides one of the most suitable locations to deliver additional uses to support the growing population of North Bristol. It is well located and has no environmental constraints. Mixed-use development on the site would be consistent with the objectives of the JSP and presents a unique opportunity to positively influence place-making in this location.<br><br>It is recommended that Plot E10, Northfield Park should be considered, as part of the preparation of the New Local Plan, and allocated for mixed-use development in accordance with the general principles set out on the Indicative Site Layout. |
| **Attached documents** | Lidl UK GmbH - Rapleys LLP (Taya Cotterill).pdf (821 KB) |

| | |
|---|---|
| **Respondent Name** | Messrs Keller, Grace, Moorlen and Barnes |
| **Comment ID** | 19889409/1235 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | Part 1 (Housing Requirements) and Part 2 (Spatial Strategy) including Questions 1, 2, 3 and Strategic Development Locations:<br><br>Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Messrs Keller, Grace, Moorlen and Barnes - Pegasus Group (Mr. Daniel Weaver).pdf (423 KB) |

| | |
|---|---|
| **Respondent Name** | Richard Edwards |
| **Comment ID** | 19925537/1252 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | I would also support the alternative redevelopment of Brownfield sites such as that at the former Kleeneze site at Martins Road, Hanham.<br><br>Many Thanks. |

| | |
|---|---|
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Claire Good |
| **Comment ID** | 19925569/1263 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | The redevelopment of the Kleeneze Brownfield site at Martins Road (Page 45) for residential purposes which would align to the Vision, Strategy and Policies and is long overdue for redevelopment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hanham Community Trust (Land at Hanham Community Centre) |
| **Comment ID** | 19926241/1327 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | Site 1 (Hanham Community Centre) and Site 2 (Hanham Sports Ground) both lie within the Hanham Urban Locality that is identified within the Draft Plan, whilst Site 3 lies within the potential Non-strategic Development Location at Longwell Green.<br><br>Sites 1 and 2 could deliver in excess of 100 dwellings, along with a new community centre and possible commercial space at the High Street. Whilst not in the Hanham Urban Locality area, the Sports Ground will be relocated to Site 3, which has additional space for sports provision and additional housing. As such, these sites should be included as key sites for change in the Local Plan as they are deliverable and also accord with the urban living principles and the opportunities set out for Hanham. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hanham Community Trust (Land at Hanham Sports Ground) |
| **Comment ID** | 20104449/1352 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | Site 1 (Hanham Community Centre) and Site 2 (Hanham Sports Ground) both lie within the Hanham Urban Locality that is identified within the Draft Plan, whilst Site 3 lies within the potential Non-strategic Development Location at Longwell Green.<br><br>Sites 1 and 2 could deliver in excess of 100 dwellings, along with a new community centre and possible commercial space at the High Street. Whilst not in the Hanham Urban Locality area, the Sports Ground will be relocated to Site 3, which has additional space for sports provision and additional housing. As such, these sites should be included as key sites for change in the Local Plan as they are deliverable and also accord with the urban living principles and the opportunities set out for Hanham. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hanham Community Trust (Land North of Abbots Road) |
| **Comment ID** | 20107489/1369 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | Site 1 (Hanham Community Centre) and Site 2 (Hanham Sports Ground) both lie within the Hanham Urban Locality that is identified within the Draft Plan, whilst Site 3 lies within the potential Non-strategic Development Location at Longwell Green.<br><br>Sites 1 and 2 could deliver in excess of 100 dwellings, along with a new community centre and possible commercial space at the High Street. Whilst not in the Hanham Urban Locality area, the Sports Ground will be relocated to Site 3, which has additional space for sports provision and additional housing. As such, these sites should be included as key sites for change in the Local Plan as they are deliverable and also accord with the urban living principles and the opportunities set out for Hanham. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Justine de Mink |
| **Comment ID** | 19936033/1490 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | I strongly support the redevelopment of the Kleeneze Brownfield site at Martins Road (Page 45) for residential purposes which would align to the Vision, Strategy and Policies outlined in the Local Plan. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Jeremy White |
| **Comment ID** | 19936257/1508 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |

| | |
|---|---|
| **Comment** | In conclusion, I would like to emphasise that I am not against development per se. Rather, that great consideration should be made to development being in places that are well positioned for people to live and work. The derelict Kleeneze site near Hanham High Street being a local example. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Gareth Shehean |
| **Comment ID** | 19936929/1516 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | I support the redevelopment of the Kleeneze Brownfield site at Martins Road for residential purposes which would align to the Vision, Strategy and Policies. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Berni O'Mahony |
| **Comment ID** | 10194497/1528 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | Question 2.2:<br>• I support the redevelopment of the Kleeneze Brownfield site at Martins Road (Page 45) for residential purposes which would align to the Vision, Strategy and Policies.<br>• I would also like to know where the Brownfield Register is for the public to access? |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | The Engine Common Trustees (ECT) |
| **Comment ID** | 19741409/1559 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | ln terms of the Call for Sites, separate Representations have been put forward to support the inclusion of a further site in Yate (Site Reference: SG129). |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | M. S. Howes |
| **Comment ID** | 19741377/1570 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | ln terms of the Call for Sites, separate Representations have been put forward to support the inclusion of a further site in Yate (Site Reference: SG129). |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Rockfield Farms Limited (RFL) |
| **Comment ID** | 20069217/1584 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | ln terms of the Call for Sites, separate Representations have been put forward to support the inclusion of a further site in Yate (Site Reference: SG129). |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Downend Estates Limited (DEL) |
| **Comment ID** | 1463137/1595 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | ln terms of the Call for Sites, separate Representations have been put forward to support the inclusion of a further site in Yate (Site Reference: SG129). |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hannah Saunders - Dodington Parish Council |

| | |
|---|---|
| **Comment ID** | 19931969/1607 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | **COMMENTS:**<br><br>2.2 Again due to local knowledge Members of Dodington Parish Council have concentrated on Yate here…. and they feel that the Magistrates Court in Yate is a key site that could be redeveloped as either a hotel or a community building. There aren't enough bedrooms in the town – and if it is to develop and there is to be more employment – then a hotel is essential…. and this site is well situated for that. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Taylor Wimpey |
| **Comment ID** | 20068353/1642 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | The site Taylor Wimpey have interests in at Mangotsfield adjoins the boundary of the Staple Hill Urban Locality (as shown on Page 39 of the Consultation Document). Although this area is currently undeveloped, and within Green Belt (due to the historic designation of the detailed boundary in this location), it is an appropriate location for residential development. Delivery of residential units on the site could assist in achieving the key opportunities for the adjoining Staple Hill area, including supporting the re-invigoration of the High Street Shopping Area by increasing the number of potential users of this facility.<br><br>Taylor Wimpey is aware of emerging proposals by Cleve Rugby Club for development on land which they own, to (in part) enable reinvestment in community sports facilities. At this stage it is not considered that there would be any specific conflict between proposals for development on Taylor Wimpey's land and the emerging proposals by Cleve Rugby Club, and if appropriate any benefits of a co-ordinated approach to the two land parcels could be considered further; however, conversely, there is no reason why development on the Taylor Wimpey site would be reliant on any further development (such as is being contemplated) on adjacent land. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | E. H. Schubert Will Trust |
| **Comment ID** | 12403425/1670 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | Please see separate 'Call for Sites' Submission in respect of the Land at Villa Farm in Aust. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | G. E. Forward |
| **Comment ID** | 20176577/1708 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | There is a perfect Brownfield site with several access routes, near to Public Transport inks, that could take a variety of housing on the Kleeneze site. In Kingswood we have derelict ugly sites such as the old Linden Hotel and the shops on the corner of High Street and Park Road. These could be developed with flair. All these sites together with many others could be for Affordable Homes and negate the desire to build on Green Belt. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kathryn Davis |
| **Comment ID** | 19936225/1732 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | Thirdly, I fully support the redevelopment of the Kleeneze Brownfield site at Martins Road. All Brownfield sites should be considered for development before raping the Green Belt for pure monetary gain by landowners and developers. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Julia Deacon |
| **Comment ID** | 19935713/1745 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | I support the redevelopment of the Kleeneze Brownfield site at Martins Road for residential purposes which would align to the Vision, Strategy and Policies. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Wendy Shortman |

| | |
|---|---|
| **Comment ID** | 19936545/1851 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | I support the redevelopment of the Kleeneze Brownfield site at Martins Road for residential purposes which would align to the Vision, Strategy & Policies. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Richard Davis |
| **Comment ID** | 19936065/1854 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | Hanham has too few green spaces and development should now be restricted to Brownfield sites such as the large Kleeneze site. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | M. G. Clapp |
| **Comment ID** | 19937281/1913 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | Dear Sirs,<br><br>**Re: South Gloucestershire Local Plan 2018 - 2036**<br><br>**Marina.**<br><br>I wish to draw to your attention a site for a much needed marina, between Keynsham Road and the Chocolate Quarter. A Pre-application was performed by South Gloucestershire Council, dated 10th October 2014 (Your Ref: )<br><br>The economic benefits to the area as well as the possibility of low cost living space in boats are enormous.<br><br>it was decided not to put a Planning Application in because of Green Belt Policy. May I respectfully suggest that the Sydenham Mead area be removed from the Green Belt. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Charlotte Hobbs |
| **Comment ID** | 19936609/1924 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | I support the redevelopment of the Kleeneze Brownfield site at Martins Road for residential purposes which would align to the Vision, Strategy & Policies. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Royal London Asset Management |
| **Comment ID** | 20029793/1959 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | Site Description and Constraints:<br><br>Stover Trading Estate is located in an urban location. It occupies a prominent position fronting Station Road (A432) which provides direct access into Yate Town Centre. It is situated in a sustainable location in close proximity to Yate Train Station, which provides direct access to nearby settlements, including Bristol. There are also a number of bus stops located on Station Road that provide access to a range of locations including Bristol, Chipping Sodbury, Kingswood and Winterbourne.<br><br>The subject site is broadly rectangular in shape as shown on the accompanying Site Plan. It extends to approximately 20.7 acres/8.36 hectares. It consists of a number of commercial properties – based on South Gloucestershire's Online Planning Portal the majority of these are industrial, manufacturing, storage and distribution; therefore falling in the B-use classes.<br><br>The majority of these are dated single storey industrial plots that could be more efficiently developed. It is understood that they are nearing the end of their commercial life. Given the nature of the area there is significant room for improvement in terms of the quality of public realm.<br><br>The subject site is an interim safeguarded site for economic development under Core Strategy Policy CS12 until such time as it comes forward for |

| | |
|---|---|
| | redevelopment for a broader range of uses in accordance with Policy CS30. This is reflected in the Emerging New Local Plan for South Gloucestershire, which outlines that a 'regeneration zone' is the focus for change and improvements in the town – the suggestion being that this area should be between the Station and Shopping Centre, which the subject site would therefore border.<br><br>The subject site is largely located in Flood Zone 1, which is land at the lowest risk of flooding. However, the River Frome runs along the Northern boundary of the site. A small proportion of the land to the North surrounding is located in Flood Zone 3, which is therefore at the highest risk of flooding.<br><br>The subject site has very limited designations as it is not situated in any protected landscapes except the Avon Community Forest, which incorporates the existing settlement and surrounding area.<br><br><u>Proposed Allocation:</u><br><br>There are two parts to these Representations, which are summarised below:<br><br>1. To broaden the uses permitted on site to include (but not limited to): offices, retail, leisure, health, community and residential.<br><br>2. Intensification of the existing built form and enhancements to existing buildings and public realm. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | JFG Gunnery |
| **Comment ID** | 19741793/1972 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | Please see Call for Sites Submission. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Douglas Homes |
| **Comment ID** | 20120033/2011 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | The Lucas Works site is currently underused and is recognised by our Client as having a negative visual impact on the surrounding residential area and in need of regeneration. The site is highlighted within the Local Plan Consultation Document as a key site for change, noting:<br><br>*The Douglas Road and Lucas Works protected employment site offers potential for better use of space, new and enhances business premises. This includes potential for residential uses as part of a mix of uses.*<br><br>The recognition that the Lucas Works site is a key site for redevelopment is obviously supported by our Client. It is acknowledged that the site forms part of a protected employment area. However, much of the site is vacant and derelict and provides no employment function. The site therefore, although protected, provides a limited amount of employment currently, and the uses it does provide for would perhaps be better served in a different location, away from residential premises.<br><br>The redevelopment of the Lucas Works site, together with the neighbouring Bus Depot site (also within our Client's ownership) could have a transformative effect on the locality. The site is in a sustainable location, within walking distance of the Centre of Kingswood, and in the context of the surrounding townscape and existing scale of buildings on the site, higher densities (than the surrounding area) could legitimately be considered.<br><br>The Local Plan Consultation Document notes that some land currently safeguarded for business uses will be suitable to change to wholly residential use, and it is considered that this should not be discounted for the Lucas (and Bus Depot) site. As noted above, whilst protected, the Lucas site offers very little in terms of employment space currently. Residential development would be appropriate for this area. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ellen Kenny - Siston Parish Council |
| **Comment ID** | 7853761/2028 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | ***<u>Recommend</u>***<br><br>***In recognition of the need for more housing allocation sites to be found near the edge of urban areas, in locations near to services and the major road network, Members suggest the former Grange School site be considered for this purpose. Whilst this mainly Brownfield site is situated on the North Eastern edge of Oldland Parish, its present vehicular access road joins only to Tower Road North at Warmley.***<br><br>***It is considered this site is otherwise landlocked, not likely to be suitable for many other uses, but in an ideal location for young and growing family homes, with the potential for connecting to other local roads.*** |

| | |
|---|---|
| | **Submitted by Cllr John Hunt in advance of the meeting of Siston Parish Council on Thursday 15th March 2018 providing relevant background information and recommendations for the consideration of those present on that occasion.**<br><br>**Siston Parish Council Response to the South Gloucestershire Core Strategy - December 2011 Core Strategy incorporating Post-Submission Changes.**<br><br>**Land at Chapel Lane, Warmley is identified in Appendix 2 and Appendix 4 – Changes to the Proposals Map as a site to be safeguarded for economic development. Appendix 2 identifies this Chapel Lane site under POLICY CS12 – SAFEGUARDED AREAS FOR ECONOMIC DEVELOPMENT, listing it under Table 1 and on Page 25 of Changes to the Proposal Map as a 'New Site' to be safeguarded for this purpose.**<br><br>**Chapel Lane, Warmley:**<br><br>We would urge that the opportunity be left available for local people to have the option of considering a change from industrial use of this land to a more compatible residential use. In the event of such a proposal then being promoted, it is felt this could well receive the strong local support required.<br><br>With an ever increasing number of private and commercial vehicles needing to access and exit these industrial units throughout every single day, the sole Chapel Lane access route has long proven to be totally unsuitable to serve such a site. Many have experienced the very poor visibility at its low standard Junction with the main A420 through road. This, together with associated on-street parking along Chapel Lane, is the cause of daily dangers to local families and others needing to use this sub-standard narrow route to gain access to their homes, the newly equipped formal children's play area, the adjacent Warmley Congregational Church or Siston Common. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alex Atkinson - Edward Ware Homes (Land East of the A4174, Shortwood) |
| **Comment ID** | 19323937/2097 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | Please refer to the accompanying Report and Appendices. |
| **Attached documents** | ward Ware Homes (Mr. Alex Atkinson) - Pegasus Group (Mr. Daniel Weaver).pdf (2.6 MB) |

| | |
|---|---|
| **Respondent Name** | Alex Atkinson - Edward Ware Homes (Land at Woodhouse Down, Almondsbury) |
| **Comment ID** | 20248001/2118 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | Please refer to the accompanying Report and Appendices. |
| **Attached documents** | ward Ware Homes (Mr. Alex Atkinson) - Pegasus Group (Mr. Daniel Weaver).pdf (14.4 MB) |

| | |
|---|---|
| **Respondent Name** | Baylis Estates Ltd |
| **Comment ID** | 19740609/2158 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | **Question 2.2. Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process?**<br><br>A Call for Sites Form is submitted alongside this Representation to seek the inclusion of Land South of Merlin Road as a development site within the CPNN. As set out above, the site is in a key location to provide integration between Cribbs Causeway and the former Filton Airfield. It benefits from Planning Permission for leisure and commercial development and enabling works have already been completed on the site. A further revised Planning Application has been submitted seeking changes to the layout of the scheme. Development is planned to commence in September 2018. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ashfield Land |
| **Comment ID** | 16658689/2277 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | ***2.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process?***<br><br>8.22 We do not have any suggested sites to put forward as part of these Representations other than the Land at Castle Farm Road which we propose should be allocated as a NSDL. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Fortannia Ltd |
| **Comment ID** | 19741217/2321 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | ***2.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process?***<br><br>Please see Call for Sites Submission – Land at Vattingstone Lane, Alveston. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Redrow Homes South West, Julia Wallington, Debra Turner, Andrew Williams, Chr... |
| **Comment ID** | 20167105/2342 |
| **Document Part Name** | Question 02.2 Are there any potential sites/buildings which you consider would be suitable for redevelopment and reuse as part of this process? |
| **Comment** | 8.22 We do not have any suggested sites to put forward as part of these Representations other than the Land North of Iron Acton Way and East of Dyer's Lane which we propose should be allocated as part of the SDL for NW Yate. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kevin Wood |
| **Comment ID** | 19176641/12 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Our recent HNS made it clear that people were not in favour of RES (62% against), but did support infill and Brownfield development. Transport links and local services must be considered when selecting suitable sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Julia Wood |
| **Comment ID** | 19176609/13 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Including the parameter of access to Public Transport in choosing the places for investigation is not realistic. The bus companies often withdraw services or provide a service which is not suitable for commuting. The decision to do this has limited the options. There are hamlets which could cope with additional Brownfield development which are not connected to Public Transport. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Stella Beecher |
| **Comment ID** | 19274081/28 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | • I support the Local Plan statement that the Council is seeking *"proportional growth of its existing villages, settlements and rural places which provides the benefits of growth without significant harm, or loss, of built and natural assets. 2.51*<br><br>Many villages are losing vital services such as a small shop, Post Office, Pub, Primary School, GP Surgery and a bus service and would welcome a few more homes in proportion to the population. Parish Councils, in consultation with their communities, could take the lead in suggesting the proportionate number of Affordable Homes which could easily be assimilated. A slightly larger population would in each village would support vital services. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | E. Felton |
| **Comment ID** | 19310689/30 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | The Council's approach to investigating the delivery of non-strategic growth is supported as set out in Paragraph 2.66. The need to be able to ensure that small sites are available and suitable for development is also consistent with the Draft NPPF (March 2018) which requires at Paragraph 69 that LPAs should identify that at least 20% of housing sites are half a hectare or less. It is also consistent with the NPPG on Rural Housing which recognises the particular issues facing rural housing. To ensure the viable use of local facilities and in retaining local services such as Schools and Public Houses, additional housing should be supported. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Robert Lomas - Iron Acton Parish Council |
| **Comment ID** | 15473953/34 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | I am aware from a Consultation session that when selecting "Engine Common" as a potential site, information used to indicate its sustainability, such as existing facilities is incorrect.<br><br>The area was noted a having two retail shopping outlets. The ones mentioned are:<br><br>Post Office and shop. This Post Office is a very small facility with minimal non Post Office supplies.<br><br>Picksons. Picksons is a Commercial Lorry Truck and Trailer parts supplies business, it is NOT a retail shop. Unless you want to take home a set of brake shoes for a Lorry!<br><br>Three Public Houses are listed. One is currently shut, (Cross Keys) so there are only two. One of those is not really a "Public House" in the sense of a premises for local socialising.<br><br>Engine Common is currently part of the green mainly rural buffer between Yate and the village of Iron Acton. To permit dense urban development to cross over to the West of the main Westerleigh Junction to Gloucester Railway Line will compromise this buffer. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anne Tyrer |
| **Comment ID** | 19338689/37 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Residents of small villages value their community and identity, which ensures that older and more vulnerable people are engaged in local activities and supported when needed. Development which joins villages together or increases the village size leads to loss of community identity and the village can become a dormitory for commuters with no interest in being involved in village life, thus reducing the quality of life for all residents. Green Belt must be preserved at all costs - once it has been built on it can never be recovered for food production or leisure purposes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kate Kelliher |
| **Comment ID** | 6031873/46 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | It is sensible to allow smaller villages to grow. So they can sustain a local School, shop or Pub. Residents should have the opportunity to move to be close to their family, or to downsize, as they get older, without having to leave their communities. It is important that older people should have their place in their own communities. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Margaret Pinder - Sustainable Thornbury |
| **Comment ID** | 19372321/57 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | The choice of sites should take as a priority those which have good access to Public Transport or which are close to urban areas, in order not to increase unsustainable modes of transport. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Richard Hartill |
| **Comment ID** | 19376225/72 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Any development on Greenfield sites should only be considered when alternative/Brownfield sites have been exhausted. The criteria to examine all Applications of whatever nature should include the impact on infrastructure, particularly roads and health services (Doctors, etc). All of the developments proposed for the Hanham area would add significantly to the already crumbling road syatem and over burdened health facilities as well as seriously adversely affecting the quality of life for local residents by removing recreational areas and wildlife in the area. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Richard Hartill |
| **Comment ID** | 19376225/75 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | The approach appears flawed and designed to "target" rural rather than non rural areas. As an example, the former Kleeneze site in Hanham has been excluded from this exercise whilst the Hanham Hills, Areas of Outstanding Beauty and of scientific interest have been included! |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Nancy North |
| **Comment ID** | 16082817/82 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Incursion on the Green Belt.<br><br>Consideration should be given to the particular value of the Green Belt (GB) in any specific location. For example, where the GB acts as a remaining and perhaps limited barrier between two urbanised areas set within the countryside; where the development of housing along a town or village boundary would result in a considerable impact and loss of visual amenity due to its elevated position; where the location of development would have a negative impact on an otherwise attractive route into a historic town, and finally where potential development over-extends the capacity of existing busy and dangerous commuting roads which were not designed for current levels of traffic. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Richard Rogers - Olveston Parish Council |
| **Comment ID** | 1060833/84 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Following release of the above Consultation, Olveston Parish Council has prepared the following Response in conjunction with a number of local residents. Discussions have focused on **QUESTION 3 - Non-Strategic Growth**, as seven key issues in Olveston Parish are affected:<br><br>• Meeting genuine local needs;<br>• The appropriate scale of development, if any, in each of our three settlements – Olveston, Tockington and Old Down;<br>• Creating sustainable patterns of development;<br>• Ensuring that the character and local distinctiveness of our settlements is maintained, including the Conservation Areas in Olveston and Tockington;<br>• Avoiding impacts on important landscape features, Biodiversity and Heritage Assets;<br>• Avoiding the Best and Most Versatile Agricultural Land; and<br>• Flood Risk.<br><br>Olveston Parish Council agree that plans for growth should create sustainable patterns of development that co-locate the new homes, employment and key services and facilities required by communities. This approach will favour locations where walking, cycling and use of Public Transport can be encouraged as distinct from locations which largely depend on car journeys. **However the settlements within Olveston Parish perform poorly against these criteria, particularly Old Down**.<br><br>Olveston Parish Council note that the low lying land to the North West of Olveston is within Flood Zone 3.<br><br>**Avoiding development within Flood Zone 3 should be a requirement, and any development in this zone would need to be justified by exceptional circumstances.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Jodie Bailey - Pucklechurch Parish Council |
| **Comment ID** | 1061057/91 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Parish Council is not convinced that the Sustainability Profiles are sufficiently nuanced to enable decisions to be made about whether or not they would be suitable for non-strategic development and that more weight needs to be placed on the HELAA process. Parish Council also believed that developments of less than 10 dwellings should be taken into account for smaller settlements. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mayers |
| **Comment ID** | 16271713/93 |

| | |
|---|---|
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Why are the rural places being considered at all? You have plenty of Brownfield near the cities that can be used. As you stated in your section about Urban Living, the cities should be built up not outwards. Building in the rural locations is just creating more needless destruction of the countryside and loss of enjoyment of the people's homes who already live there, Many people live in these areas to get away from other people and the horrible looking new Estates that are cropping up all the time. When areas become built up the roads cannot cope and more crime starts becoming a problem. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Claire Normoyle |
| **Comment ID** | 7883105/110 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | I think Option One should be used and looked into more closely. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Rachel Trudgian |
| **Comment ID** | 6032033/117 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | From the number of homes listed (2,579) it is apparent that for a village, Frampton Cotterell has already had more than its fair share of "non-strategic" development in recent years.<br><br>If you keep adding "non-strategic" growth on top of more "non-strategic" growth it will have the same effect as strategic growth leading to *"a strategic change of a rural place, for example changing small villages into very large villages or new towns."* Building here should therefore not be considered as the village does not have the infrastructure to cope with yet more housing. For example, the roads are narrow and not purpose built for the additional cars more growth would result in.<br><br>An area that was previously Green Belt land, on the edge of Frampton Cotterell – Woodlands Farm, should in fact be added back into the Green Belt to help prevent the destruction of this village. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anne Gale |
| **Comment ID** | 16344321/122 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Yes, Green Belt should be saved. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kate Kelliher |
| **Comment ID** | 6031873/136 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Frampton Cotterell is very close to the Strategic Location of Coalpit Heath, with 1,800 proposed homes, indeed the area identified lies within Coalpit Heath Parish Council area  The area has insufficient School places, 3 small convenience stores, none of which would be suitable for a weekly shop.  One of these is further reduced in size by having a Post Office counter installed. The Doctor's Surgery is small and only part time. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Simon Russell - Integer Planning & Development |
| **Comment ID** | 19435265/143 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Options 2 & 3 should be given full consideration for the delivery of rural non strategic residential development. As the Document states to exclude areas within the Green Belt from consideration effectively means that the Council will be forced to deliver more housing in other areas of the Authority and which may not represent in wider terms those locations affording the most sustainable options. |

| | |
|---|---|
| | The potential of identifying Settlement Boundaries for the larger settlements currently identified within the Green Belt and allowing for infill development should be considered where this has no demonstrable impact of interests of acknowledged importance e.g. AONB, ECOLOGY, FLOOD RISK ETC. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Barry Turner - Oldbury Parish Council - NDP |
| **Comment ID** | 6146049/144 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Non-Strategic Development in the rest of South Gloucestershire.<br><br>Response to Question 3:–<br><br>3.1 The objective of these proposals is to find sufficient development sites to deliver the non-strategic requirement and possibly the contingency. SGC is seeking to create a portfolio of smaller and medium sites. It is acknowledged that emerging Government advice is for 10% of the Plan total to be on smaller sites.To achieve the quantity of homes required without severely spoiling the character of 'rural places' **all** villages and settlements should be included for consideration.<br><br>By selecting only 35 rural places those remaining (circa 20 ) could be denied the opportunity for non-strategic growth. This in effect denies them the opportunity to improve their sustainability.<br><br>It is suggested that the objective should be proportional growth for **all** communities.<br><br>Whilst accepting that the Consultation Document proposes that the excluded places can follow the Neighbourhood Planning route to achieve some growth, the work entailed for Parish Councils with limited resources is disproportionate to the benefits likely to be achieved. Those with least resources unlike the proposed 35 would have to do most of the work to meet the requirements of the Neighbourhood Planning (General) Regulations 2012 with no guarantee that the Plan produced would pass Referendum which of course would not be a requirement for the 35. Likewise the Local Authority has a duty to support Neighbourhood Planning and would have to manage a larger workload, would this be the best use of resources?<br><br>3.2 **Option 3** should be used to investigate sites for non-strategic growth. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Martin Gillian |
| **Comment ID** | 19445537/146 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Broadly support of looking at the identified villages for non-strategic growth, but within the capability of the villages and their infrastructure to support such growth. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Oliver Simmonds |
| **Comment ID** | 19446017/152 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | It would be wrong to rule out any development within the rural areas of S. Glos but as the sensitivity of each site varies, so will the need to be sensitive to the scale and quality of each development. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ben Pearce - LD&PC Ltd |
| **Comment ID** | 15142049/154 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Non-strategic growth locations should exclude sites adjacent to urban edges, which fall to be considered as sustainable urban extensions. The rationale for identification of non-strategic growth should be to direct an appropriate scale of development towards rural locations to contribute to the sustainability and vitality of rural communities. |

| | |
|---|---|
| | Consideration should be given to a more flexible approach to the identification of individual sites which may not meet the lower size thresholds but would contribute to a sustainable, organic form of village development without compromising the ability of such settlements to accommodate the new development.<br><br>Identification of suitable rural growth locations on the basis of Flood Zones and access to facilities appears to be a blunt approach to assessing the wide variety of settlements in South Gloucestershire. In particular, the Local Authority must be realistic about the opportunity to access a range of facilities without recourse to a private vehicle in rural areas; the material benefit of development to rural communities must be balanced against increase in car journeys. Thus, settlements such as Tormarton, which benefit from a smaller range of facilities excellent access to the national Highway Network and are outside of the Flood Zone should be considered as locations that can accommodate a substantial development allocation to improve local service provision and house supply without compromising the capacity of the rural Highway Network. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Julian Round |
| **Comment ID** | 19328513/156 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Why have 20 villages been excluded (55 are in the original list but only 35 have been selected)? The Consultation says that "The Council is seeking proportional growth of its existing villages, settlements and rural places, and the best way to achieve this proportionality is to spread the load as far and wide as possible (55 villages would only need to find approx. 25 houses each, whereas 35 would need to find approx. 35 houses). Why, at a site level, has the limit for non-strategic level of growth been decided as a site capable of delivering at least 10 homes (lower limit) - why is this so high? Not many villages will be able to support multiple developments of 10 houses and maintain proportional growth. Small villages have proven capability to deliver strong growth through infill and small (2 - 5 houses) developments, and can continue to do so. Developments of greater than 10 cannot be "smoothed" evenly over 18 years as can the smaller developments. The risk of the current limit of 10 is that a precedent will be set, and another 10 will follow the first 10 (and so on), with the quick loss of proportionate growth.<br><br>In summary, I propose selecting a larger number of villages, and choosing a lower "lower limit" which better facilitates "smooth" and proportionate growth, over the entire period of the Local Plan. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Thompson |
| **Comment ID** | 17795873/163 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | No. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Lyn Haigh - Rangeworthy Parish Council |
| **Comment ID** | 2301601/183 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | It is hard to understand how a small rural village like Rangeworthy with an inadequate sewerage system, and bisected by a busy road could be “identified” as a possible site for further development when it has already grown by a quarter in the past four years and current Outline Planning Applications could increase that numer to over 50% in under a Decade.<br><br>Rangeworthy was the only village to engage with South Gloucestershire Council during the original PSP Consultations starting in 2014. The Parish Council recognised that allowing the village to grow by 20 - 30 dwellings over the following twenty years was the right thing to do, particularly if the accommodation met needs at either end of the spectrum: small, affordable homes for first-time buyers and retirement properties for down-sizers. The number was also dictated by Wessex Water’s recommendations regarding the capacity of the sewerage system following regular incidents of homes being flooded. Despite work by Wessex Water in 2017 to seal pipes along the main road, there have been several incidents of serious flooding during the past six Months (before building has even started on all the houses for which Permissions have been granted).<br><br>It appears that the Parish Council’s willingness to consider any development at all has led to it being regarded as a soft target by speculative developers and Planners alike. Since 2014, SGC has granted Planning Permission for 44 new dwellings in Rangeworthy of which only 5 are 2-bedroomed with 37 being 4-bedroomed detached plus a large Gospel Hall off the main road (I would be happy to provide full details of all the Application Reference Numbers on request). Admittedly, should the Applications currently under consideration for additional sites of 50 and 14 dwellings respectively be Approved then they would bring more Affordable Housing but this would result in the village growing by more than half in under a Decade. This rate of growth is not sustainable and will predate the reference period of the Plan under Consultation so a period of consolidation is essential for community cohesion.<br><br>The B4058 is used by an increasing number of heavy vehicles for access from the M5 to Yate, East Bristol and the M4 and this will doubtless grow when Junction 18A is finished, especially since the Joint Transport Study which accompanied the Joint Spatial Plan did not offer any amelioration/ mitigation North of Yate. A recent Speed Survey produced an average of 36 mph in the 30 mph zone which means many vehicles are driving at much higher speeds and SGC obviously recognised this a couple of years ago when refusing to provide a School crossing patrol because “it would be too dangerous.” A Dropped Kerb crossing point for the children was sited at what was then deemed the site with best visibility but it appears that this can now be moved along the road to a point with poorer visibility to facilitate development access. The lack of a major accident on this stretch is frequently cited but I consider that to be a matter of luck (two articulated vehicles have left the road in the last three years but, |

| | |
|---|---|
| | fortunately, only damaged property since there were no cyclists or pedestrians in the vicinity) and the additional openings and traffic will increase the risk of one occurring.<br><br>It is also worth noting that there is no shop, very little employment, the bus service is infrequent, no youth organisations operate and the Primary School is approaching capacity. This means that new residents will use their cars for commuting and access to shops, Medical Services, Schools, sports facilities and entertainments thereby increasing air pollution and congestion on the roads to Yate, Bristol and the M4 at Falfield which is already struggling and that is before the new developments at Charfield, Thornbury, Yate, Engine Common and Buckover are built as specified elsewhere in this Plan. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Philip Box |
| **Comment ID** | 19453025/193 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | The approach to non-strategic development has included a number of historic, picturesque villages, such as Horton, Cold Ashton, Hawkesbury Upton and Wick, which are extremely precious, historically defined communities. Such places' unique character, size, and rural environment mean they should not be investigated for further development, even in the limited sense. The approach should be refined to ensure that such places are duly accorded the protection they merit. Focus should not just be on "squeezing in" as much development as possible, and mitigating the impacts, but also more generally on protecting specific places and their special characteristics for their own sake.<br><br>Such places as listed above are extremely valuable both aesthetically and environmentally, in terms of their character and situation in a predominantly agricultural area. These communities are also bounded by a number of important factors, such as historic Medieval fields, woodlands and picturesque scenery et cetera. Whether within AONB or just outside, development in these areas would have an extremely detrimental impact on the quality of the area, both in terms of reduction of natural assets, and a distortion of the historic character of the settlements. Where settlements are located just outside the AONB, and the expansion would clearly impact on the historic views from the area and general character, and such impacts should not be considered in false isolation (given their knock-on impacts on the surrounding area through aspects such as increased traffic, light pollution, changes to views and destruction of fields et cetera).<br><br>Consideration of the historic nature of these communities, or their predominant characteristics, is notably absent from the headline methods of assignment. That such small and historic settlements are even being considered for "investigation" is extremely worrying for those concerned about the character, and continued preservation of the countryside and local heritage.<br><br>Although the intention of looking at a wider number of sites is intended to minimise the impact on particular villages, this broad-brush approach is extremely unsatisfactory given the unique historical, environmental characteristics of each community. To take a broad-brush approach unduly includes villages and communities which should not be facing development pressures due to their historically bounded and important characteristics, which comprise their essential value as picturesque, historic, valued rural places.<br><br>Criteria for deciding places for "investigation" (in terms of non-strategic development) should include historic, environmental, size and other such essential characteristic concerns as a clear deterrent to development investigation. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Martin Dedman |
| **Comment ID** | 19453377/202 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | I understand the need for more housing - particularly housing that young people, young families can afford. I also appreciate that just building edge of town Housing Estates is not the only option and each community needs to develop suitable housing for its residents. However in the proposal the non strategic sites have been limited to 35 villages out of a list of 55 villages. That doesn't make any sense to me - why not include all locations to help spread the load?<br><br>Of the three Options I would suggest Number 3 gives the most flexibility - both Inside and Outside the Green Belt.<br><br>Another issue I don't understand/agree with is that developments of less than 10 houses don't count towards the total of 1,300 homes. Why not? The best way to add more homes within a village, with as little damage to the local character and community as possible, is to develop small sites within the village boundary with infill projects and conversion of land that has, for example, disused agricultural buildings. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Carolyn Baker |
| **Comment ID** | 17252193/205 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |

| | |
|---|---|
| **Comment** | Option 1 - Outside the Green Belt only - should be investigated. The importance of the Green Belt MUST NOT be underestimated. It provides the green lungs of the adjacent urban areas. A health benefit freely available to all for recreation and relaxation. The loss of habitat for flaura and fauna cannot be justified. Building in these rural areas will inevitably lead to the building of new roads and thus greater car use and associated infrastructure. It would result in urban sprawl which was the main aim of the creation of the Green Belt. If all Brownfield sites and existing Planning sites were maximised this non-strategic growth within the Green Belt would not be required. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Peter D. Box |
| **Comment ID** | 19453441/220 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | The function of the Avon Green Belt is stated in the following Policy:<br><br>"A Green Belt shall continue to surround and separate Bristol and Bath and will be kept open in order to:<br><br>• Check the unrestricted sprawl of the Bristol conurbation and Bath;<br>• **Assist in safeguarding the surrounding countryside from encroachment;**<br>• **Prevent neighbouring towns from merging into one another;**<br>• Preserve the setting and special character of **villages,** towns and historic cities; and<br>• Assist in urban regeneration."<br><br>Proposed developments at Thornbury, Charfield , Buckover and the so-called non-strategic sites will contravene a significant amount of the Green Belt Policies.<br><br>To counter this argument with the statement that the proposed developments are outside the current Green Belt is a cynical misinterpretation of the whole principle of Green Belt. The developments are on the edge of the Green Belt and would in any case clearly fail to safeguard the surrounding countryside from urban encroachment. The connection between Green Belt and open countryside would be severed, turning the Green Belt into something akin to a land-locked lagoon with unpredictable effects on wildlife within.<br><br>Many native species of flora and fauna are seriously threatened by the encroachment of urban areas into hitherto virgin countryside. Some are formally ranked as endangered. To protect these species with which we humans share our planet, every effort must be made to protect their habitats and allow unrestricted migration to ensure that gene pools are maintained in a healthy condition. Looking at that part of the JSP relevant to South Gloucestershire it is noted that three major housing developments are proposed for the Northern area of the County. 500 units are planned for Thornbury (in addition to large housing developments in the pipeline), 1,200 for Charfield and a staggering 3,000 for Buckover. All three proposed developments are geographically close and whilst outside the current Green Belt (just) would, together with the multiple smaller non-strategic sites,effectively form an urban barrier between the Green Belt and open country to the North and East. Whilst some species adapt to survive life in urban areas, the long term effects of these adaptations are as yet unknown. When birds start to imitate telephone ring tones when calling for a mate, it is surely the start of a slippery slope to extinction.<br><br>Furthermore, I have yet to see evidence of a detailed Survey of what native flora and fauna would be put at risk by these developments. For example, the Buckover site mentioned above, is currently prime agricultural land: its implementation would destroy some five farms covering forty fields with 20km (12.5 miles) of field boundaries and hedgerows, all vital thoroughfares for wildlife. Also destroyed would be a disused Quarry and an area of woodland (Rudge Wood); both habitats different to the prevailing farmland. Admittedly one version of a Plan for Buckover shows the woodland retained within the development but surrounded by essentially urban development its unique character would be destroyed. Unless it were to be rigorously maintained it would be in danger of being polluted by such detritus as stolen shopping trolleys, empty beer cans and the seemingly inevitable plastic waste. And such maintenance itself, would impact on the security of the habitat. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Neil Emerson |
| **Comment ID** | 19454049/222 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | All of the named areas have limited or poor transport and minimal local employment opportunities. Therefore all the additional residents the developments will bring, will require car travel. Many of the villages have no Primary Schools and most no Secondary Schools so again more car travel.<br><br>1,800 additional houses is too many for the rural areas. As a minimum a Primary School needs to be a requirement and/or Public Transport that meets employment's needs for a site to be viable. A minimum requirement for Public Transport would need to be 7am to 7pm.<br><br>if any area does not meet these minimum standards they should not be considered. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Gillian Sanders - Wessex Water |

| | |
|---|---|
| **Comment ID** | 19455361/230 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | The approach used to determine the rural places to initially investigate for non-strategic growth appears sound. It is noted that the 35 places are selected for further investigation and growth has not been allocated at this stage. Further Environmental Appraisal and Consultations with the affected communities will be necessary. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Leslie Forrest - Campaign to Protect Rural England South Gloucestershire Dist... |
| **Comment ID** | 16478497/243 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Updating the 2017 Annual Monitoring Report by including recent Planning Approvals reveals that within seven of the thirty five listed rural settlements, 310 houses are planned to be built in 5 years, for the period beginning April 2016, the base date for the JSP figures. In addition unattributed small sites other than in the North and East Fringe, Yate and Thornbury are producing on average 86 dwellings each year. If these are typical and there is no evidence to suggest that they are not, then over the 20 years of the Local Plan under current Policies one can expect upwards of 1,240 houses, plus whatever proportion of the smaller sites total of 1,720 dwellings is relevant. It appears that there is no need to identify specific villages for expansion, generic growth will suffice. Once villages are identified for expansion they will become the focus for speculative development ranked, not by any Sustainability Criteria no matter how well researched, but by the most saleable. Sites are identified by the landowners through the Call for Sites not as the Consultation suggests by the LPA and therefore any Policy based on the false premise that sites will be available that match the chosen criteria in sufficient numbers to enable selection by merit, is itself false. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Helen Johnstone - Stroud District Council |
| **Comment ID** | 14317537/250 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | 1. Support the inclusion of villages within and outside the Green Belt, and within the Cotswold AONB, in the initial investigation of non-strategic growth locations. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Louise Seaman - Mactaggart & Mickel |
| **Comment ID** | 19457953/272 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | M&M support the identification of Frampton Cotterell as a location that is capable of accommodating additional development. The settlement has a wide range of services and facilities which make it a particularly sustainable location to accommodate additional development. Whilst it is acknowledged that the Green Belt surrounds part of the settlement it is considered that there are opportunities to release land from the Green Belt to provide for sustainable development whilst providing a long term boundary to the Green Belt. Land at Poplars Farm is ideally placed to accommodate such a development. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Emma Jarvis |
| **Comment ID** | 2745345/280 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Yes , the approach has totally overlooked some rural places which already have access to Schools, shops, employers, playing fields, Scouts, business units within just a short walking distance and have bus links e.g. Tortworth Parish and Leyhill. These places may not have a Settlement Boundary as such but they have far more facilities to hand than places that are being investigated.<br><br>Some odd choices have been made in the Appendix 1 Key Issues Analysis, which does not give enough weight to villages which already have key facilities such as Schools and major employers, where residents can walk to School or work. Here are some examples:<br><br>Acton Turville has a Post Office, Pub and store. Unlike Falfield it has a Primary School within the village. Yet it has been discounted because although it has a bus service, the frequency and timings do not meet the criteria. Why has so much weight been put on the bus timings compared to being able to walk to School? Why has no weight been put on opportunities for rail transport? Acton Turville is on a main line and already has its own railway station “Badminton Railway Station” which could be reopened.<br><br>Badminton has a community centre, Post Office, two stores plus a Primary School. Yet it has been discounted because although it has a bus service, the frequency and timings do not meet the criteria. Why has so much weight been put on the bus timings compared to being able to walk to School? Why has no weight been put on opportunities for rail transport? Badminton is on a main line and already has its own railway station “Badminton Railway Station” which could be reopened. |

| | |
|---|---|
| | Aust has a community centre, Pub and store. Unlike Falfield it has two major employers within walking and cycling distance. Yet it has been discounted because although it has a bus service, the frequency and timings do not meet the criteria. Why has so much weight been put on the bus timings compared to being able to walk to employment?<br><br>Hallen has a community centre, Pub, 5 major employers, a Primary and a Secondary School within walking distance. Yet it has been discounted on Public Transport grounds. Why has so little weight been put on walking to School or major employment? Why has no weight been put on opportunities for rail transport? Hallen is on a main line and has had its own railway station "Hallen Halt Railway Station" which could be reopened as part of improved services on the Severn Beach Line.<br><br>Clearly not enough weight has been put on being able to walk to local village Schools or to local major employers in the selections which is a more sustainable approach than travelling there by bus. It also does not allow the local community to sustain their local rural Schools and businesses.<br><br>Why not provide a better bus service for these locations which are already thriving communities to give them more support? It would be far cheaper than forcing housing upon places with less community infrastructure and having to build Schools and facilities in the long run.<br><br>Why not consider reopening railway stations as part of a long term plan to support the villages alongside the railway lines? |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Lesley Brown |
| **Comment ID** | 16384673/288 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | An accurate review of the Sustainability Appraisals should take place. At present they are completely inaccurate. This gives a wrong impression of which areas can sustainably take more housing e.g. Winterbourne is stated as having only 3 comparison retail stores. In fact it has at least 27! Many of its facilities have been omitted. Frampton Cotterell is said to have a Post Office in Church Road, when in fact this was closed at least 12 years ago. I forwarded the correct information to the Planning Department via Cllr Claire Young. These are just the areas that I know of as I am not familiar with others but it does cast doubt on all the Appraisals I would suggest |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Joanne Plumbley |
| **Comment ID** | 19466625/303 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Selection should be based on safety, environmental impact, Public Transport options and facilities within the village itself. Whilst the number of houses proposed will undoubtedly have a severe adverse affect on the whole area consideration must be given to those areas which cannot absorb extra traffic and residents without significant damage to the character of the village and the safety and quality of life of the residents.<br><br>Minimum requirements should be a Primary School, regular Public Transport during AND outside of working hours, safe roads for additional traffic and sufficient shops, Doctors etc to sustain additional residents. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sarah Blackmore |
| **Comment ID** | 16193889/307 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Consideration does not seem to have been given to the close proximity of Strategic Development locations (SDL). For example Coalpit Heath has been identified as an SDL with a proposed 1,800 homes. However, Frampton Cotterell, which adjoins Coalpit Heath with no visible discernible boundary, has been identified for non strategic growth, with the potential to build up to another 500 homes. Whilst it has already been argued that Coalpit Heath is not a suitable location for building 1,800 new homes, the possibility that a further 500 could be built in close proximity does not bear thinking about with regards to the local infrastructure, as both sites would be utilising the same services. Incidentally the land identified in 'Frampton Cotterell' for non strategic growth is actually in Coalpit Heath under Westerleigh Parish Council. This means that this land should not be identified as suitable for non strategic growth due to the SDL already proposed for Coalpit Heath.<br><br>I am also concerned about the Sustainability Appraisals for Coalpit Heath and Frampton Cotterell. There are numerous inaccuracies. The Profiles as a whole contain many subjective phrases such as 'several,' 'many' etc. The Paper states that "Comments in the 2015 Topic Paper stressed the need to update checks of services and facilities present in each village." However, they are still full of inaccuracies e.g. Frampton Cotterell is listed as having 2 Post Offices, one of which is on Church Road. This closed at least 10 years ago. The Sainbury's Local is still being classed as a supermarket when it is not. |

| | |
|---|---|
| | The Coalpit Heath Post Office should be shown as a Post Office Counter within a convenience store and not as a dedicated Post Office. The GP Surgery should be shown as a part-time Branch Surgery. It doesn't open every day and sometimes closes all together. It is also said that we have 15 comparison retail stores, but I can't name that many. There have been some closures. It appears as though the Profiles are still out of date & not fit for purpose. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Gardener-Wollen |
| **Comment ID** | 19466913/314 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | I would like to support the Non-Strategic Growth Option 3 of investigations both Inside and Outside of the Green Belt. Our village of Hawkesbury Upton is under extreme pressures from speculate land agents with greed to develop land in designated AONB site without exceptional circumstance.<br><br>**Non-strategic Growth:**<br><br>The Parish is in the process of producing a Neighbourhood Plan and Community Land Trusts.<br><br>it is being proposed that 1,300 homes need to be built in non strategic sites (i.e. small villages, such as Hawkesbury Upton) over the next 18 years. There are 3 Options in the Consultation - one for development Inside Green Belt only (currently 28 villages proposed), one for development Outside Green Belt only (currently 12 villages proposed) and one for development Inside and Outside the Green Belt (currently 35 villages proposed).<br><br>it is being proposed that 1,300 homes need to be built in non strategic sites (i.e. small villages, such as Hawkesbury Upton) over the next 18 years. There are 3 Options in the Consultation - one for development Inside Green Belt only (currently 28 villages proposed), one for development Outside Green Belt only (currently 12 villages proposed) and one for development Inside and Outside the Green Belt (currently 35 villages proposed).<br><br>Paragraphs 2.53 - 2.54 indicates that 10 houses is the "lower limit" for a non-strategic level of growth and that smaller sites can be suggested for rural settings, but will not count as non-strategic growth. All development in rural settings should count towards non-strategic growth numbers, with no lower limit.<br><br>• We need to reduce the upper limit to ensure development remains proportionate and we remove the risk of small villages becoming small towns (which incidentally is a Policy in the Local Plan (i.e. they don't want this type of big development in our small villages)).<br>• We need to include EVERY home towards the target of 1,300 - why should a development of 2 or 3 homes not count? - because it's possible small villages can deliver their total allocation in small chunks like these, without needing groups of 10 or more.<br>• Questions 3.1 and 3.2 relate to this issue.<br><br>Appendix 2:<br><br>Non-strategic growth areas should be constantly kept under review and revised.<br><br>Sustainable Transport matters are constantly changing; the Parish although served by Public Transport, it is unreliable, does not run after 6.00pm nor on Sundays and is totally supported by a threatened Council budget.<br><br>The local village shop is a community enterprise, run with the help of volunteers.<br><br>There is very limited employment opportunities. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | B. Gardener-Wollen |
| **Comment ID** | 19466977/316 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Any developments should be spread across all 55 villages to ensure that no one place is pressured into producing major developments. This would help maintain the character of Villages and allow them to develop more naturally. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sarah Blackmore - VALID Action Group |
| **Comment ID** | 19467105/320 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Consideration does not seem to have been given to the close proximity of Strategic Development Locations (SDL). For example Coalpit Heath has been identified as a SDL with a proposed 1,800 homes. However, Frampton Cotterell, which adjoins Coalpit Heath with no visible discernible boundary, has been identified for non strategic growth, with the potential to build up to another 500 homes. Whilst it has already been argued that Coalpit Heath is not a suitable location for building 1,800 new homes, the possibility that a further 500 could be built in close proximity does not bear thinking about with regards to the local infrastructure, as both sites would be utilising the same services. Incidentally the land identified in 'Frampton Cotterell' for non strategic growth is actually in Coalpit Heath under Westerleigh Parish Council. This means that this land should not be identified as suitable for non strategic growth due to the SDL already proposed for Coalpit Heath.<br><br>I am also concerned about the Sustainability Appraisals for Coalpit Heath and Frampton Cotterell. There are numerous inaccuracies. The Profiles as a whole contain many subjective phrases such as 'several,' 'many' etc. The Paper states that "Comments in the 2015 Topic Paper stressed the need to update checks of services and facilities present in each village." However, they are still full of inaccuracies e.g. Frampton Cotterell is listed as having 2 Post Offices, one of which is on Church Road. This closed at least 10 years ago. The Sainbury's Local is still being classed as a supermarket when it is not.<br><br>The Coalpit Heath Post Office should be shown as a Post Office Counter within a convenience store and not as a dedicated Post Office. The GP Surgery should be shown as a part-time Branch Surgery. It doesn't open every day and sometimes closes altogether. It is also said that we have 15 comparison retail stores, but I can't name that many. There have been some closures. It appears as though the Profiles are still out of date & not fit for purpose. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Hicks - Falfield Action Group |
| **Comment ID** | 16618369/324 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | 2.5 – Leaving the maximum number of dwellings for non-strategic growth to be between 0 & 500 puts the rural communities which are being targeted for this development at significant risk of being over-developed and ruining their character and rural landscape. Clear, specific and enforceable limits need to be documented, detailing both the maximum number of dwellings under the non-strategic growth category and separate volumes for the contingency.<br><br>2.51 - The Comments concerning the development not being of a scale that would lead to a strategic change of a rural place is insufficient. There are no definitions given for small villages, large villages etc. Likewise there is no definition for smaller and medium sites. These omissions leave the Document open to individual interpretation and will cause challenges for the Development Committees when considering proposed development sites.<br><br>2.51 - The Plan is seeking proportional growth of its existing villages, settlements and rural places, yet is intentionally vague, which should not be the case. With the large range of the number of dwellings defined as 'non-strategic' this will only lead to developers submitting Applications for much larger developments than the proposed locations can absorb without negatively impacting the area. The likelihood is that developments will not bring additional services of amenities, putting more pressure on the nearest towns to provide Schooling and Medical Services and increasing the use of the motor car on rural roads which are poorly maintained due to lack of funding.<br><br>2.52 Restricting 10% of the Plan's total to be on sites of 0.5ha, or less is insufficient. The Plan should increase this percentage to give rural residents' confidence that the quota will not be forced upon a few targeted rural communities.<br><br>2.53 states - 'At a site level, a non-strategic level of growth will be any single site capable of delivering at least 10 homes….'<br><br>2.50 states – 'This therefore provides the 'upper limit' of non-strategic growth in any one rural place, whether delivered as a **single site** or cumulatively on multiple sites. However, in many circumstances only a level of growth much lower than 500 homes in one rural place will be acceptable.' The statements contradict each other as one is talking about potentially delivering up to 500 dwellings with one site, the other says it will be restricted to 10 dwellings.<br><br>2.53 – The potential for up to 50 developments of 10 dwellings in a location causes great concern as they would invariably not include the provision of any increased amenities or services for residents in locations that are already unsustainable.<br><br>As the Plan relies on landowners putting forward land for development, speculative developers are likely to propose larger non-speculative developments where landowners are repeatedly prepared to sell land, leading to condensed development in certain areas. Falfield is at risk of this as the landowner of the Heneage Farm site (85 dwellings Approved in December 2017) has also put up a significantly larger area of land for development under the Call for Sites. The woolly definitions given will support such Applications as there will be no quantifiable controls in place to protect the villages in question.<br><br>2.59 – The exclusion on Oldbury on Severn is premature. Their Local Plan is not finalised and may amount to nothing. It is interesting that this is the of the Conservative Council's , who is a vocal supporter of the 'Buckover Garden Village' and shows little sympathy to development in other rural areas. This decision could be construed as favouring Constituents. Oldbury on Severn should be included in the list of places proposed for investigation for Non-Strategic growth. |

| | |
|---|---|
| | Sustainable Access Villages & Settlements Findings 2018:<br><br>• Charfield, Coalpit Heath, Thornbury and Yate are excluded from investigation of Non-Strategic Growth as they have been identified as Strategic Development Locations. 60% of Buckover Garden Village is in Falfield Parish, NOT Thornbury. There are currently c.240 dwellings in Falfield Parish, with a further 85 Approved at Heneage Farm. Buckover would deliver 1,800 additional homes (60% of 3,000), giving a total of 2,125 homes, increasing the number of dwellings by 654%. Falfield should therefore be excluded from inclusion in places for investigation of Non-Strategic Growth.<br>• Disregarding Buckover, the baseline number of dwellings in Falfield is based on the number of dwellings in the village before the Heneage Farm Application was Approved, yet there is no indication in the Document if these 85 houses 'count' towards the 1,800 dwellings to be developed by non-strategic development. Approved Plans to double the size of the village should exclude Falfield from the Non-Strategic Growth sites.<br>• The Plan fails to recognise that a number of the rural locations have seen no increase in the number of dwellings. Growth to date and Approved developments should be considered, with those rural locations that have seen no growth contributing towards the shortfall.<br>• The availability of Public Transport does and travel times is misleading - you cannot for example reach Bristol City Centre within 30 minutes on a bus at any time of day, let alone during commuter travel windows. There is too much weight given to there being a particular number of buses during weekdays which do not travel to major employment locations or have good connections to them. No-one working on a Sunday can get to work by Public Transport from Falfield as there are NO buses. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Claire Young |
| **Comment ID** | 916289/335 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Although the stated intention is to exclude communities affected by Strategic Development Locations identified in the JSP, this Document takes a very narrow view of this. For example, the "Yate" SDL is actually in Iron Acton and Westerleigh Parishes. It would join up with Engine Common, narrow the gap considerably between Iron Acton Village and Yate and extend right down to the boundary of Westerleigh Village. Yet Engine Common, Iron Acton and Westerleigh are all considered as potential sites for non-strategic development. Westerleigh is also very close to the Coalpit Heath SDL and Cromhall and Falfield are very close to the Charfield SDL. How would non-strategic growth at these locations be distinct from the strategic growth?<br><br>It is important to avoid wildly disproportionate growth in any community. However, I would not want to see a set percentage of growth applied to all settlements under consideration. That does not take into account development that has already occurred in recent years nor does it allow the smaller settlements to grow enough to have an impact on their ongoing viability.<br><br>Saying in Paragraph 2.8 that the rural areas "have not had any planned new housing, over and above infill within existing Settlement Boundaries, for many years" overlooks the significant unplanned new housing that has taken place in some communities. For example, The Meads development at Frampton Cotterell was not allocated in a Development Plan, and other villages have also seen significant speculative developments. This unplanned growth should not be used to justify further major growth.<br><br>Other villages have had very little development for many years and might benefit from having a little more than a standard percentage would indicate in order to support services.<br><br>Rather than allocating growth based on a simple formula, a detailed assessment of each community is needed. I am concerned that the Profiles developed to date are insufficient for this purpose. Also communities need to be involved in the assessment and the Local Plan should identify how this will happen. Where communities want to produce Neighbourhood Plans, the Council should provide support.<br><br>It is important to ensure that the SDLs and non-strategic developments do not combine to erode the distinction between communities. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Dean Simmonds |
| **Comment ID** | 19467521/391 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | • Why limit non strategic sites to only 35 of the 55 villages that are listed in the Plan? In my view the more villages chosen then the less each village would have to absorb and the more likely the local character of each village can be maintained. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Simmons - Westerleigh Parish Council |
| **Comment ID** | 17221409/400 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |

| | |
|---|---|
| **Comment** | **3.1. Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate for non-strategic growth?**<br><br>**WPC questions the validity of the data used for this Parish on the sustainability factors, such as access to services.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ann Barker |
| **Comment ID** | 19784257/426 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | **I am really puzzled why Engine Common has been identified as a potential site for development. I read that it was important to SGC to only consider developments in places where the number of houses would not substantially change and overwhelm the existing village. I see that you indicate there are houses in Engine Common currently and also that you are looking for sites that could accommodate a minimum of 10 houses. Recently (June 2017) a Planning Application by Sydney Freed for 90 houses was declined by SGC because "it would have a significant and harmful impact on the setting of Engine Common." Therefore the question I would like answered is how many houses do you deem could be built without changing and overwhelming the current habitation?** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alveston, Rudgeway, and Earthcott Parish Council |
| **Comment ID** | 19784545/431 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | **When considering the opportunities we need to ensure the unique selling points for each of the locations is considered and understood.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Peter Rawlinson - Gleeson Strategic Land Limited |
| **Comment ID** | 19328353/449 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Gleeson Strategic Land generally agrees with the Council's approach in determining the 35 rural places to be investigated for non-strategic growth potential.<br><br>Moving forward it is considered that additional constraints will need to be taken into account to further refine the most suitable places for development. For example once environmental constraints are taken into account the smaller settlements such as Hambrook, Old Down and Bridgeyate may be found to be less suitable which will in turn put greater pressure on the more sustainable settlements.<br><br>It is important that the Council continues the current approach of not discounting settlements in the Green Belt from further consideration. Through the Joint Spatial Plan (JSP), the West of England Authorities have recognised the benefits of locating as much of the development as possible in sustainable locations, which will inevitably include some areas currently in the Green Belt. This philosophy should carry through to the Local Plan level and so the Local Plan should also not exclude rural places which are within or bounded by the Green Belt. The preparation of a new Local Plan provides the opportunity to assess the current Green Belt boundaries and to make sensible adjustments to ensure that sustainable development is delivered. Redrawing Green Belt boundaries can also improve the function of the Green Belt if the new boundaries are drawn in such a way that better serves the five purposes of the Green Belt.<br><br>Further evidence will be needed to assess the settlements in the Green Belt and this assessment should be detailed and go down to the fine grain of individual sites and their role in contributing to the Green Belt.<br><br>Areas affected by other high level constraints, such as the Cotswold AONB, should also be included in the areas of search for new development opportunities so that the most sustainable development options can be included. An AONB designation is not necessarily a barrier to any development. Appropriate and sensitive residential development can be achieved that avoids harmful effects on the AONB and also works to strengthen the sustainability of existing settlements. It is also possible that the most sustainable options for new non-strategic growth will come from areas in the AONB and these should not be discounted at this early stage in the Local Plan process. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alan Jones - Hanham District Green Belt Conservation Society |
| **Comment ID** | 17236353/502 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | 3.1 Rural Places:<br><br>Building houses in rural areas, devoid of growth areas of employment land will be in direct opposition to the Government requirement to reduce CO2 emissions by 57% in 2030, from 1990 levels. |

| | |
|---|---|
| | Without SGC facilitating suitable employment close to these locations, together with the absence of adequate Public Transport, travel distances to work will by necessity, be considerably increased and therefore guaranteed to increase commuter traffic and consequently, added CO2 pollution!!<br><br>Delays and cost over-run of major Public Transport expansion has been demonstrated by the Bristol MetroBus scheme - spent over years and still no buses running!!<br><br>The approach of the Plan is totally based on the provision of housing 'for sale' the construction and management of rental properties has been ignored - this accommodation will not be provided by housebuilders in rural or semi-urban areas as this is contrary to their ethos - South Gloucestershire Council must commit to reviewing this vital sector, in order to provide mixed tenure options to supply the accommodation currently needed across all areas.<br><br>As previously stated, the forecast housing needs are based on inaccurate data and housing provision in isolated rural locations will not be sustainable long-term. A deeper analysis of the long-term housing requirements is necessary - rental properties, starter accommodation etc linked to employment growth areas, before assessment of the Strategy for implementation, and delivery of the homes that are required by people today.<br><br>We have strong opinions that this process will not be led by Local Authority, but driven by the housing developers/constructors. |
| **Attached documents** | Hanham District Green Belt Conservation Society (Alan Jones).pdf (20.3 MB) |

| | |
|---|---|
| **Respondent Name** | Daphne Dunning - Cromhall Parish Council |
| **Comment ID** | 16475073/603 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | 3.1<br><br>Again, as consistently stated, Cromhall is in the absolute middle of the housing explosion centred around J14 of the M5. We have submitted a number of letters explaining our situation, anxieties and the impact of all of the building in areas from Yate, Charfield, Buckover, Thornbury and even Gloucestershire, plus the many other large development areas within a few miles of Cromhall, so it is a big surprise that Cromhall appears prominently in the Local Plan for non-strategic growth. Worse than that Cromhall has been conveniently annexed into 2 unconnected dwelling zones within the village of Cromhall and the other 60% of Cromhall has been excluded.<br><br>This act of separation within a long established and functioning village is totally inappropriate and counter to how this village is seen by the Authorities and the villagers themselves. This village cannot be annexed to suit a model in your calculations allowing it to fit neatly into a category of infrastructure that it does not possess. We reserve the right to keep our village's population, function, and make-up, we did not receive any advanced Consultation that our village would be segregated for this exercise despite constant engagement with yourselves, and the justification stems from an inaccurate Publication based on one Document from 2006 which is at complete odds with the 2011 Census Data and ALL data supplied by ourselves since the JSP Consultation.<br><br>Cromhall is the main village, which in turn encompasses several housing zones that are sited at staggered points along/just off of the B4058, these zones are loosely joined with houses interspersed directly facing the B4058, these zones create the Character of Cromhall and should any bulk 'filling in' between these zones occur it would markedly change the character and appearance of the village. Today Cromhall has approx. homes in total and as calculated during the 2011 Census it had permanent household residents, so we are confused as to why you have chosen to use data detailing a figure of only houses across only the North end of Cromhall when you also have the data from the 2011 Census.<br><br>Bibstone Hamlet, Townwell, Talbots End, Rectory Lane, through to Heath End, Jubilee Lane and Cowship Lane all sit within the boundary of Cromhall Village and are effectively just named areas within a whole village. 'Cromhall' is the only entrance sign on the way into the village. The few amenities located within Cromhall serve the whole village and the surrounding area and need to be calculated as such when making decisions on the future of the village.<br><br>Whilst these zones are encompassed within the banner of Cromhall they all retain their own distinct separation and individual character within a larger village structure. **It would be absolutely wrong to assume that any of these named areas could support an additional housing allocation for Cromhall on its own**. **These zones each function largely with between 15 to 40 houses each and in no way could they support a disproportionate increase in houses relative to their number without fundamentally changing their character, function and look of any one of the zones.**<br><br>On prior calculations and formal Documents Cromhall has been treated as a complete entity so we are concerned that it has not been treated as such in this instance. The Council would expect that the village is treated as it operates in reality and does not have its population adjusted on paper to fit in with a more desirable sustainability model. This village is long with points of sparse housing linking more developed areas, it is therefore difficult to establish a traditional village centre point which could be defined by a group of shops as the few amenities we have are dispersed through the length of the village.<br><br>The Council would also point out that sustainability data for this area could be inaccurate or misleading - The No. 201 bus no longer serves Cromhall. The other bus service that visits Cromhall is not reliable or of practical use for an attempt at a daily commute to Yate and rural Bus services are constantly reducing at the whim of commercial companies. Other Public Transport commutes to major employment zones are non-existent. |

| | |
|---|---|
| | Superfast Broadband has bypassed areas such as Bibstone and the Openreach Exchange Cabinet is over 2km away resulting in an archaic reliance on old copper wires as the only option available. This service WILL be further impacted by new development.<br><br>There is talk of a small Enterprise Zone between Charfield and Cromhall which may be used to justify sustainability score improvements. However, in reality how does this increase either economic or environmental sustainability when a site that may offer 20 or even 40 jobs in a rural setting is dwarfed by some 10,000 people who are anticipated to move within a 4-mile radius of the zone? |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Karen Longden |
| **Comment ID** | 19831809/612 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | **Non-Strategic Growth:**<br><br>I agree that we should make provision for small-scale development in South Gloucestershire's villages where this can be done without significant harm to their character and amenities, and without damage to, or loss of valuable built, historic or natural assets. Sites should only be allocated with the agreement of local people and South Glos should engage openly with local people.<br><br>Sites should be chosen with local people's agreement and the "exceptional circumstances" test should be applied when considering any development on Green Belt land. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christine Eden - Marshfield Community Land Trust |
| **Comment ID** | 14404353/618 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | **Q 3.1 Approach to Non-strategic Growth:**<br><br>MCLT agrees with SGC's approach that has ruled out an option which would require blanket growth across all rural places e.g. all have 5% or 10% more homes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Zoe Hancock - Bristol Avon Catchment Partnership |
| **Comment ID** | 19832225/675 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | The approach used to determine the rural places to initially investigate for non-strategic growth appears sound. It is noted that the 35 places are selected for further investigation and growth has not been allocated at this stage. Further environmental appraisal and Consultations with the affected communities will be necessary. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mark Williams |
| **Comment ID** | 19729473/719 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | The approach adopted by the Council in identifying settlements and locations involves the widest possible range of sites by including the majority of settlements and urban locations within the District. This approach, which includes land within the Green Belt and AONB is supported, as the key determinant must be the creation of sustainable patterns of development, rather than excluding such designated areas without interrogation of the opportunities that might be presented.<br><br>In addition, it is welcomed that the Council has sought to identify sites in a range of settlements, not simply focusing on the larger settlements and Strategic Development Locations. These larger locations will deliver levels of development for the District. However, the needs of smaller and rural settlements should not be overlooked if they are to remain as sustainable locations.<br><br>Therefore, the Council's approach to include smaller settlements in the search for site allocation is supported, and the identification of smaller sites is of course in line with the Government's emerging NPPF.<br><br>Wick is one of the settlements identified as a "Place for Investigation" in Table 1 of the Consultation Document and Appendix 1 confirms that it |

| | |
|---|---|
| | has sustainable access to key services and facilities. Land subject to flooding (Flood Zone 3) is found at the centre of the village, following the Boyd. However, this does not impact the site.<br><br>The Sustainable Access Profile (February 2018) produced by the Council to consider the settlement confirms that there are a number of facilities in the village, along with Public Transport links to higher order centres.<br><br>This simple analysis therefore reconfirms the credentials of the settlement as a location for smaller levels of development as part of a wider Sustainable Development Strategy, which is supported in principle. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Chelverton Developments Ltd |
| **Comment ID** | 16478625/732 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Q3 – Non-Strategic Growth:<br><br>Chelverton emphasises the essential role that non-strategic sites will play in meeting the JSP/Local Plan housing requirement. This especially owing to the history of slow delivery on Strategic Housing Allocations and failure to demonstrate a 5-year supply of deliverable housing land in South Gloucestershire. Furthermore, it is difficult to predict the timing and likely housing yield from the new 'urban living' approach. Accordingly, the Council should ensure that it allocates a range of deliverable housing sites that have the capacity to address the JSP/Local Plan residual housing requirement with an ample buffer to ensure choice/competition and to reflect the Council's record of under-supply. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | James Carpenter - Falfield Parish Council |
| **Comment ID** | 16617825/739 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Falfield Parish Council notes that Paragraph 2.56 states that the Appendix 1 *"initial list of villages contains settlements and villages with either defined settlement boundaries or recognised collections of dwellings."* Some of the places selected for review have as few as 18 dwellings. However this list has omitted to review the merits of some larger rural places and Parishes, perhaps without a settlement boundary but with collections of rural dwellings which already have access to Schools, shops, community facilities and major employment and bus links within a short walking distance.<br><br>Not enough weight has been placed on being able to walk to local village Schools or to local major employers in the selection of villages for assessment. Too much weight has been put on the ability to travel to more remote Schools or employers by bus. This is a contradiction, as in rural areas having these facilities nearby is far more attractive and sustainable than travelling there by any vehicle and it cuts out many vehicle trips. This methodology also deprives small village Schools of the opportunity to increase pupil numbers from within their local community and reduces the local pool of staff within walking distance available to local employers.<br><br>For example, looking at your list of places not selected for investigation, the villages of Acton Turville, Aust, Badminton and Hallen all have similar facilities to Falfield Village however unlike Falfield Village they also have Schools and/or major employers within walking distance, yet this is given little or no weight compared to bus timings. This imbalance needs to be reconsidered.<br><br>Where a village already has a School and or a major employer within walking distance, consideration should be given to the provision of a missing key facility, e.g. a shop/Post Office as part of any new housing allocations to improve the sustainability of that location and reduce vehicle trips.<br><br>Instead of penalising villages for having less buses, why not offer them a better bus service funded by the saving to the Council Taxpayer of not having to pay for School transport from less sustainable villages without Schools. There is too much weight in the analysis on current bus timetabling as opposed to other more permanent factors. Bus services change regularly and conversely can be rerouted and adapted by South Gloucestershire Council to suit, it should not be the overriding factor for housing allocation.<br><br>The potential for future public rail transport connections has not been given any weight. Some of the villages not selected for investigation are adjacent to existing main railway lines, some still have their own railway stations and platforms (albeit currently closed) which could be considered for reopening to improve the Public Transport provision and sustainability of these locations.<br><br>Villages without any Schools and any major employers within walking distance should be excluded from the assessment as they are overly reliant on transport. |
| **Attached documents** | Falfield Parish Council (Mr. James Carpenter).pdf (1.9 MB) |

| | |
|---|---|
| **Respondent Name** | Sovereign Housing Association |
| **Comment ID** | 16477825/774 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |

| | |
|---|---|
| **Comment** | The approach adopted by the Council in identifying settlements and locations involves the widest possible range of sites by including the majority of settlements and urban locations within the District. This approach, which includes land within the Green Belt and AONB is supported, as the key determinant must be the creation of sustainable patterns of development, rather than excluding such designated areas without interrogation of the opportunities that might be presented.<br><br>Longwell Green is identified as a "Place for Investigation" in Table 1 of the Consultation Document and Appendix 1 confirms that it has sustainable access to key services and facilities, as well as not being covered by Flood Zone 2 and 3.<br><br>The Sustainable Access Profile (February 2018) produced by the Council to consider the location is centred on our Client's land as the focus for any development opportunities. The assessment confirms that there is a "reasonable level of sustainable access to most key services and facilities" and review of the Mapping produced in association with the assessment demonstrates that most of the local community facilities are indeed in very close proximity to the promoted land, along the A431.<br><br>This proximity to services and facilities makes our Client's land a sustainable location for development and we support the consideration of all sources in considering suitable locations for non-strategic growth. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Harrow Estates Plc and Robert Hitchins Ltd |
| **Comment ID** | 19898721/781 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | See attached. |
| **Attached documents** | Harrow Estates Plc and Robert Hitchins Ltd - Barton Willmore (Robyn Nicholl).pdf (6.3 MB) |

| | |
|---|---|
| **Respondent Name** | Heather Elgar - West of England Nature Partnership |
| **Comment ID** | 19839553/787 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Please find below Comments from the West of England Nature Partnership (WENP) in response to the South Gloucestershire Local Plan Consultation.<br><br>For transparency, please know that Dominic Mellon (Consultant in Public Health for South Gloucestershire Council) sits on the WENP Board and thus note a declared conflict of interests. This Response reflects the aims and objectives of the Partnership and does not reflect views of individual Board members.<br><br>Question 3: Non-strategic Growth:<br><br>Note Response to 3.3 below.<br><br>(Response to 3.3 copied below:<br><br>WENP recommends that development should happen on the least ecologically valuable land, and where it promotes sustainable modes of living. Ecologically valuable land may often, but does not necessarily, fall in the Green Belt. As such, WENP recommends that the principles of safeguarding ecological assets (identified through Strategic Green Infrastructure Planning) and facilitating sustainable modes of living (as demonstrated through the principles of 'Urban Living,' or indeed the 'Dutch model' cited on P. 48) should come before the preservation of the Green Belt. WENP recognises the importance of the Green Belt for place shaping, and recommends that the Green Belt is avoided, after first considering the ecological value and sustainability of locations.<br><br>Possible locations should be identified through a strategic Environmental Needs Assessment (as part of, or alongside, the West of England Green Infrastructure Plan) to ensure that land does not become locked in for development which could more valuably form part of a strategic and resilient Green Infrastructure Network that benefits both people and nature.<br><br>AONBs are important ecological areas and WENP is concerned by any major plans to develop there. As stipulated in the National Planning Policy Framework, development in AONBs should be avoided unless in exceptional circumstances. We would question that there are exceptional circumstances to justify development there at this stage. Any development that does come forward in the AONBs – or indeed any ecologically sensitive area – should be respectful of the landscape and strategic green infrastructure, and its impact appropriately mitigated for in line with the Government's ambition for a net gain in natural capital as laid out in the 25 Year Environment Plan. WENP expects that such principles and strategic green infrastructure will be laid out in the West of England Green Infrastructure Plan, as well as mechanisms to enable appropriate mitigation, and that these will be carried forward into the Local Plan.) |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | SPM Homes Ltd |
| **Comment ID** | 19732097/821 |

| | |
|---|---|
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | The preferred approach to the locational delivery of non-allocated sites should be to score the sites against the three pillars of Sustainability rather than whether or not the site lies within the Green Belt.<br><br>The Green Belt is no longer fit for purpose and if left unaltered will severely constrain the future delivery of housing and jobs. To exclude Green Belt sites would be a missed opportunity resulting in a Development Strategy which by definition would be entirely unsustainable. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ian Beckey |
| **Comment ID** | 19952961/904 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | *With regards to the Rail Network (Question 3) (SDLs) we feel that if Buckover is to go ahead then the MetroBus Network to Bristol and Wotton Under Edge should be completed alongside the Thornbury Line being reopened for passenger traffic as a tram-train service to Bristol or a shuttle to Yate to connect with MetroWest.*<br><br>*Freight traffic could also use the line to service the Quarry and the new Oldbury Power Station.* |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Howard Owen - Cleve RFC |
| **Comment ID** | 19732321/912 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | The subject site is located within Mangotsfield, one of the 35 rural places identified as a 'Place for Investigation' for Non-Strategic Growth within Table 1 of the Consultation Document.<br><br>Appendix 1 of the Document notes that Mangotsfield is situated within the Green Belt, and is not covered by Flood Zone 2 or 3. The Document also confirms that the location has sustainable access to most key services and facilities, some via walking and cycling, and many others via Public Transport.<br><br>This proximity to services and facilities makes the subject site a sustainable location for development and we support the consideration of all sources in considering suitable locations for non-strategic growth. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Robin Pearce - Ivywell Capital Ltd |
| **Comment ID** | 19998625/960 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | 1) The general approach used to determine the 35 rural places the Council is proposing to investigate for non-strategic growth is supported as is the presentation of the 3 broad options to approaching such investigation in locations inside and outside the Green Belt. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David Moodie |
| **Comment ID** | 19732737/978 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Please see supporting Representations Document and Call for Sites Submission. |
| **Attached documents** | Mr. David Moodie - Fisher German LLP (Ms. Angela Smedley).pdf (578 KB) |

| | |
|---|---|
| **Respondent Name** | Eric Heath - Avon Wildlife Trust |
| **Comment ID** | 19883713/994 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | No Comment on the approach, although it is noted that the places were selected for further investigation and growth has not yet been allocated. Further Environmental Appraisal and Consultations with the affected communities will be required. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Cate Davidson - Sodbury Town Council |
| **Comment ID** | 4877793/1006 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Dear Planning Team,<br><br>Sodbury Town Council responds as follows to the Local Plan (non strategic) Consultation:<br><br>Q. 3:<br><br>3.1 No Comments.<br><br>Please note the Comments as appropriate. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hannah Spanton - Badminton Estate |
| **Comment ID** | 19884225/1028 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | The approach taken to define the settlements is considered to be very simplistic as it appears too focused on the existing services and facilities within villages rather than the aspirations of the village itself. This is at odds with the more general Comments within the Consultation Document about sustainability, the desire to strengthen communities and providing facilities to enable all parts of the community to prosper (Page 3).<br><br>It should be recognised that development within rural areas as set out in Paragraph 28 of the NPPF can help these communities thrive and actually presents an opportunity to retain and enhance existing facilities to ensure that these areas thrive and do not stagnate.<br><br>Having regard to Appendix 2 of the Consultation Document, it would appear that the approach taken to allocating patterns of development is not in accordance with the NPPF and recent case-law. The Local Plan Consultation Document focuses development on the larger rural settlements which have been interpreted as sustainable. The Document suggests that allocating 10 or more dwellings outside of the shortlisted settlements would create unsustainable patterns of growth and lead to isolated rural dwellings.<br><br>Setting a benchmark of "10" dwellings seems to be an arbitrary figure that has no regard for the village, its environment or its capacity for growth. Indeed the Consultation Document notes that a blanket growth approach is not appropriate (2.72). It is considered that each village should be considered on its merits and that Policy should simply indicate that growth that is compatible with smaller settlements should be considered on its merits and will be supported by the Plan. Artificially reducing the amount of development to 10 dwellings may preclude additional benefits that larger developments may be able to deliver such as Social Housing and this approach is not in accordance with Paragraphs 17 and 55 of the NPPF or the PPG.<br><br>The matter of isolated dwellings and the interpretation of Paragraph 55 has been the subject of a recent Court of Appeal Decision ([2018] EWCA Civ 610 dated 28th March 2018). Within this Decision Lord Justice Lindbloom was clear that there is a distinction between isolated dwellings which are remote from other places, buildings or people, and Paragraph 55, which should be read in conjunction with the role of sustainable development. It cannot be said that just because a settlement does not have any or relatively few services of its own, it can be considered isolated as the Policy expressly recognises that development in a small village may enhance and maintain services in a neighbouring village, as people travel to use them.<br><br>In summary, the NPPF sets out that settlements are the preferred location for housing development in rural areas and as a result all rural settlements should be seen as appropriate for some development. It is our opinion that growth should be compatible with the size and structure of the village and not limited by a notional amount of development that is artificially set by Policy.<br><br>My Client; the Badminton Estate owns significant land within the District, including around many of the villages and is currently looking at their land holdings to assess the potential for development, and where there are opportunities to improve facilities within the local community as well as ensuring the longevity of the Estate for the future.<br><br>They are currently considering development opportunities within Acton Turville and Tormarton. Contrary to what is set out in Appendix 1, in relation to non-strategic growth, it is considered that these settlements are suitable and sustainable to accommodate additional growth. Applying the one-size-fits-all approach of the Sustainable Access Methodology ignores the specific characteristics of individual rural settlements and the benefits that can be delivered to their communities by enabling appropriate and well-designed development.<br><br>Having regard to the Sustainable Access Profile (February 2018), there are a number of Comments which must be made. |

**Acton Turville:**

The village of Acton Turville has a number of facilities within it including a; Primary School, village shop, Post Office and Public House all within the centre of the village. The village also benefits from a large employment area North of the railway line that accommodates a range of small and medium size businesses. There are therefore a number of services, facilities and employment opportunities that would benefit from some incremental growth.

It is acknowledged that there is a reasonable bus service within the village sufficient to support additional housing growth. Irrespective of this the Market Towns of Yate and Chipping Sodbury are approximately 7 and 6 miles respectively from the village as the crow flies; Bristol City Centre is approximately 17 miles from the village. The NPPF is clear that opportunities for sustainable transport solutions vary between urban and rural areas (Paragraphs 29 and 34). Provision of Public Transport is sufficient for the site to be considered broadly sustainable.

As has been set out above, Paragraph 55 of the NPPF supports housing development where it will enhance or maintain the viability of rural communities, this is also a core Planning Principle set out in Paragraph 17. The PPG goes further to state that *"A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as Schools, local shops, cultural venues, Public Houses and places of worship. Rural housing is essential to ensure viable use of these local facilities"* (Ref: 50-001-20160519).

Acton Turville has not benefitted from any growth since the 1980's and accordingly the village has become increasingly more expensive for those that live there and wish to live there. Given the level of services that already exist in the village, it is considered that some proportionate growth would ensure that there continues to be a range and mix of housing within the village that would support the social wellbeing of the local community as well as providing incremental and sustainable growth for the future.

The Comment in relation to the village being in Flood Zone 3, is misleading as the only area which is in Flood Zone 3 lies to the North of the railway line outside of the centre of the village.

The village is washed over by the AONB and also has a sensitive Conservation Area. Whilst these areas define the character of the village, they do not preclude sensitive and well-designed development.

As a result, the village of Acton Turville should be considered as sustainable and suitable for further development within the emerging Plan.

**Tormarton:**

The village of Tormarton is located close to Junction 18 of the M4. The Sustainable Access Profile sets out that the village has a range of facilities including a Public House and community centre.

The village has good access to the A46 and the M4 beyond. A number of Strategic Travel Routes as set out in Policy PSP10 also intersect the village.

The NPPF is clear at Paragraph 55 that *"housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby."* The settlement of Tormarton is clearly an example of where development in the village can have a positive impact on surrounding villages, for example children living in Tormarton going to the local School in Acton Turville as well as helping to ensure the viability of the existing facilities within the village.

The village is in close proximity to Yate as well as the cities of Bath and Bristol. There is a bus service to these settlements that makes the village more sustainable.

Equally, Tormarton has seen limited growth for many years making the village as a whole less affordable and less sustainable.

With a reasonable range of existing facilities, it is considered that further incremental growth could be accommodated within Tormarton to support indigenous growth.

Tormarton is similarly washed over by the AONB and also benefits from a historic core. Nevertheless, these do not preclude suitable and appropriate development designed to support the village.

As a result, Tormarton should also be seen as sustainable and suitable for additional development.

**Concluding Comments:**

Having regard to the key issues identified in the Consultation Local Plan together with the wider definition of sustainable development, it is considered that the settlements of Acton Turville and Tormarton should be considered as suitable for future development, in order to ensure the vitality of these communities and the surrounding rural hinterland.

| | |
|---|---|
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Robin Pearce - Bristol & England Properties |
| **Comment ID** | 19884417/1072 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | 1) The general approach used to determine the 35 rural places the Council is proposing to investigate for non-strategic growth is supported as is the presentation of the 3 broad options to approaching such investigation in locations inside and outside the Green Belt. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Clifton Homes Ltd |
| **Comment ID** | 16617921/1081 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | **Please see submitted Representations.** |
| **Attached documents** | Clifton Homes Ltd - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (1.7 MB) |

| | |
|---|---|
| **Respondent Name** | South West Strategic Development and Ian and David Knipe |
| **Comment ID** | 19884577/1105 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Please see submitted Representations. |
| **Attached documents** | SW Strategic Development and I. and D. Knipe - Grass Roots.pdf (27.4 MB) |

| | |
|---|---|
| **Respondent Name** | Progold Ltd |
| **Comment ID** | 19737665/1119 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Please see submitted Representations. |
| **Attached documents** | Progold Ltd - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (7.9 MB) |

| | |
|---|---|
| **Respondent Name** | Emma Powell - Redrow Homes Limited |
| **Comment ID** | 19737921/1148 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Part 2 - Non-strategic Development:<br><br>Question 3:<br><br>The following Comments relate to Paragraphs 2.47 – 2.83 and the Section entitled "Non-Strategic Development in the rest of South Gloucestershire." The JSP proposes 1,300 dwellings will need to be allocated in South Gloucestershire to meet the requirements of non-strategic growth. This figure is derived from the West of England JSP Topic Paper 2 Spatial Strategy - November 2017. Non-strategic growth is defined as over 10 homes and below 500 homes. As mentioned in commenting on the Strategy it is not clear how this figure was derived. The JSP also proposes a contingency from non-strategic sites of 500 dwellings.<br><br>Representations have been submitted to the JSP that the contingency of only 3% fails to provide sufficient flexibility in terms of housing delivery.<br><br>The intention is that subject to confirmation in the JSP is that the contingency will be released through the Local Plan Review which will take place every five years.<br><br>The Regulations which require Local Planning Authorities to review their Local Plans and statements of community involvement every five years came into force on 6th April 2018.<br><br>The Local Plan needs to set out a Strategy to accommodate non-strategic growth, the Local Plan acknowledges that historically the Plan has relied on larger sites in a limited range of places to meet the District's need, in which case the benefits of growth are only focussed in a limited number of |

| | |
|---|---|
| | places. Furthermore, if the delivery is not achieved much needed housing Is not provided. Non-strategic growth envisages development in selected rural communities and also potentially includes rural areas adjacent to the urban areas. This approach is welcomed and supported.<br><br>***Question 3.1:***<br><br>***Do you have any Comments on the approach used to determine the 35 rural places we are proposing to investigate for non-strategic growth?***<br><br>***(Please see Paragraphs 2.56 - 2.66 and Appendices 1, 2 and 3)***<br><br>The approach set out in Para 2.56 – 2.66 is supported, i.e. places were assessed whether they would be realistic and suitable to investigate for non-strategic growth against two key Planning issues:<br><br>• "Creating sustainable patterns of development; and<br><br>• Sequential approach to Flood Risk"<br><br>Appendix 1 of the Consultation Document sets out a list of villages, settlements and urban edge places within the rural areas of South Gloucestershire. It is noted that Hambrook has been assessed initially and considered for further investigation. Table 1 which includes Hambrook is supported. Land at Hambrook, is a sustainable location in terms of growth/transport infrastructure and considered by the JSP evidence:- Green Belt Assessment Stage 2, to have only limited contribution to the purposes of the Green Belt. The Flood Risk assessment is also positive.<br><br>Appendix 2 of the Consultation Document considers patterns of development that co-locate the new homes, employment and key services and facilities required by communities. Sustainable Access Profiles have been prepared (February 2018 as part of the Evidence Base to support the preparation of the Local Plan) and Hambrook has access to a wide range of services and facilities within walking and cycling catchment areas, including number of employers ( major employers and safeguarded employment areas are within 2,000m walk or cycle, Stoke Gifford District Centre and the Abbey Wood Retail Park are also within the 2,000m walk or cycling catchment).<br><br>In order to support the promotion of Land at Bristol Road, Hambrook a Sustainability Appraisal (Appendix 1 to our Representations) has been prepared which comprises a series of Environmental Appraisals which describe the existing environmental conditions present on the site and identifies the opportunities and constraints with regard to the development proposal. The following Reports are included in the Sustainability Appraisal:<br><br>• Landscape Assessment<br><br>• Preliminary Ecology Appraisal<br><br>• Transport Sustainability Appraisal<br><br>• Heritage - Archaeological Desk-based Assessment and Setting Assessment<br><br>• Agricultural Land Classification Survey<br><br>• Flood Risk and Surface Water Drainage Sustainability Appraisal<br><br>The findings of these Environmental Appraisals above have been used to assesses the site against the Council's Sustainability Objectives and to assess the site's sustainability credentials with regard to the development proposed. Appendix 1 attached to the Representations includes the Sustainability Appraisal. |
| **Attached documents** | Redrow Homes Limited (Emma Powell) - Pegasus Group (Mrs. Sarah Hamilton-Foyn).pdf (34.1 MB) |

| | |
|---|---|
| **Respondent Name** | Phill Bamford - Gladman Developments Ltd |
| **Comment ID** | 15612065/1177 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | **3.4 Question 3.1 – Do you have any Comments on the approach used to determine the 35 rural places we are proposing to investigate for rural growth?** |

| | |
|---|---|
| | 3.4.1 Gladman consider that there is an over-reliance on Strategic Development within the SGLP and the 1,300 units which are allocated to non-strategic development locations is not sufficient to meet local peoples' needs.<br><br>3.4.2 In order to ensure that the SGLP is deliverable and maintains a 5 year housing land supply across the Plan Period, the Plan should allocate a wide variety of sites in a wide selection of locations and of varying sizes to maximise housing delivery and meet the needs of the local population. Given that the housing requirement for the whole of the West of England is considered to be under-estimated, any uplift which is needed as a result of the Examination of the JSP in South Gloucestershire should therefore be allocated to additional non-strategic locations to ensure that the needs of rural settlements can be met.<br><br>3.4.3 The SGLP recognises that planning new homes for suitable rural places has an important role in ensuring the long-term vitality, vibrancy and sustainability of rural communities. It offers opportunities for home ownership for younger people, allowing them to stay in their rural communities. It provides support to rural services and facilities including business, shops and education facilities and it provides much needed market and Affordable Housing for local people.<br><br>3.4.4 Gladman therefore consider that a greater level of development should be directed towards the rural settlements in South Gloucestershire to ensure that the aims set out above are delivered.<br><br>3.4.5 The Council have set out that it is seeking proportional growth of rural settlements dependent upon their size, capacity and sustainability. A detailed assessment of each settlement is therefore required, as part of the Plan preparation process, to ensure that the level of development directed towards each settlement is appropriate, justified and meets the aims set out in the SGLP.<br><br>3.4.6 In terms of the Options set out in the Plan, it is considered that based upon the guidance set out in the emerging Framework, the Council should investigate fully all options for rural growth in settlements outside of the Green Belt before going on to investigate settlements in the Green Belt if necessary. This is the option that most closely follows current Government Guidance.<br><br>3.4.7 Gladman support the identification of Wickwar in the list of suitable rural settlements which could accommodate additional housing growth. Wickwar has a number of services and facilities which serve the settlement, provides support for a wider rural hinterland and has good Public Transport connections to places with higher order services and facilities. Sites are also available for housing growth in the settlement which are not constrained and provide sustainable development opportunities (see Gladman's submission to the Call for Sites exercise – Land South of Horwood Lane, Wickwar).<br><br>3.4.8 Wickwar has a number of services and facilities which are within easy walking and cycling distance of the site, including: a bus stop, public open space, Pub, Post Office, leisure centre, SPAR shop, Social Club, ATM and community centre as well as various local businesses.<br><br>3.4.9 The 82 and 84 (operated by Wessex Bus) bus provides 13 services a day in each direction towards Yate and Watton-Under-Edge.<br><br>3.4.10 The nearest railway station is in Yate which is 8km from the site. It offers services to a range of destinations including Gloucester, Bristol Temple Meads, Bath Spa and London Paddington. The journey to Bristol Temple Meads takes approximately 20 minutes and operates at least once an hour between 6.45am and 10.11pm.<br><br>3.4.11 Additional housing growth should therefore be directed towards Wickwar through the SGLP. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Bovis Homes Limited |
| **Comment ID** | 20044801/1201 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Please refer to enclosed letter. |
| **Attached documents** | Bovis Homes Limited - Rapleys LLP (Mr. Tony Clements).pdf (259 KB) |

| | |
|---|---|
| **Respondent Name** | Messrs Keller, Grace, Moorlen and Barnes |
| **Comment ID** | 19889409/1236 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Part 1 (Housing Requirements) and Part 2 (Spatial Strategy) including Questions 1, 2, 3 and Strategic Development Locations:<br><br>Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Messrs Keller, Grace, Moorlen and Barnes - Pegasus Group (Mr. Daniel Weaver).pdf (423 KB) |

| | |
|---|---|
| **Respondent Name** | Reuben Bellamy - Lone Star Land Limited |
| **Comment ID** | 19738529/1244 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Question 3.1:<br><br>Support is given to the Emerging Local Plan's identification of Hawkesbury Upton as a location to be investigated for non-strategic growth at Appendix 1 and Table 1.<br><br>Appendix 2 identifies that the Council will create sustainable patterns of development utilising their Evidence Base and Sustainable Access Profiles which they have prepared for each village.<br><br>With that in mind, based on the Council's own evidence, Hawkesbury Upton is a sustainable location for the development of additional dwellings over the Plan Period. The February 2018 Council collated Sustainable Access Profile for Hawkesbury Upton confirms that the village has an 'acceptable-good' access when considered against relevant sustainability criteria.<br><br>In accordance with the Council's own evidence, facilities within Hawkesbury Upton that would benefit the development site include:<br><br>Please see the attached Document for Comments relating to the above.<br><br>There are opportunities to access cycle routes within 3km of the site and bus services are accessible within 350m of the site, providing up to one service per hour (including to provide access to centres of employment).<br><br>Paragraph 28 of the NPPF states that Local Plan should include Policies to support strong rural economies. Para 29 recognises that different Policies and measures will be required in different communities, and that opportunities to maximise sustainable transport solutions will vary from urban to rural areas. Para 55 states that housing in rural areas should be located so as to enhance or maintain the vitality of rural communities.<br><br>Development in this location would therefore meet NPPF objectives and those set out at Para 2.49 of the Emerging Local Plan, creating a customer and user base to support the existing services and facilities in rural communities, including the viability of Public Transport connections, and offering opportunities for home ownership for people who wish to stat in their rural communities. |
| **Attached documents** | Lone Star Land Limited (Mr. Reuben Bellamy) - WYG (Miss. Sarah Butterfield).pdf (406 KB) |

| | |
|---|---|
| **Respondent Name** | Richard Bull - Environment Agency |
| **Comment ID** | 11527745/1255 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Non-Strategic Growth Allocation:<br><br>Question 3.1:<br><br>The Agency must formally request Consultation regarding the rural places identified for Non-Strategic Growth, once further investigation has been undertaken (Appendix 1) to enable further observations regarding, inter alia, Flood Risk concerns.<br><br>During further investigations, the Sequential Approach should be applied, to identify all sites within Flood Zone 1, in accordance with the National Planning Policy Framework. Flood modelling data and asset information can be requested from the Agency's Enquiries Team, to assist with further site investigation/allocation:<br><br>WessexEnquiries@environment-agency.gov.uk<br><br>For many of these rural locations the Agency's Flood Map for Planning (Rivers and Sea) is based on generalised flow modelling from 2006. As such there could be benefit from undertaking further modelling work to assist in identifying suitable sites from the shortlist. This would be particularly pertinent where Flood Risk Corridors run through the locations, for example in Bridgeyate and Falfield.<br><br>Please note, the Agency's future modelling programme (funding dependent) includes provision for potential new models for the Siston and Warmley Brooks, Bitton, Boyd and Bradley Brook (including tributaries).<br><br>The Agency is pleased to note the community of Oldbury-on-Severn will be considered separately in light of the recently undertaken Strategic Flood Risk Assessment (SFRA) Level 2 (Para. 2.59). Upon release of the UKCP 2018 outputs the SFRA Level 2 model should be re-run, in accordance with the Agency's Comments in response to the Draft Climate Change Strategy 2018 - 2023. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Conor Lee - Hannick Homes |
| **Comment ID** | 11945985/1315 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | 1) The general approach used to determine the areas for non-strategic growth is supported as is the presentation of the 3 broad options to investigating in locations inside and outside of the Green Belt. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hanham Community Trust (Land at Hanham Community Centre) |
| **Comment ID** | 19926241/1328 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | The Plan is at an early stage and so a broad approach to determine potential Non-strategic Development Locations is principally based on access to key services and facilities, along with Flood Risk with areas in Flood Zones 2 and 3 eliminated. From this, 35 settlements/locations have been identified for further investigation through the Local Plan making process.<br><br>It is considered that non-strategic growth should be proportionate to the size and sustainability of settlements, clearly whilst also considering the merits of available sites in each location. A broad spread of sites, in rural and urban fringe locations should be allocated to provide a mix of available housing sites both in terms for size, type and geographical location. This will help ensure that strategic scale growth is complemented and that housing needs across the District are met.<br><br>Further to this, the investigation of locations within and surrounded by the Green Belt is supported. Whilst the NPPF places great weight on retaining Green Belt land, it also highlights the need to promote sustainable patterns of development when reviewing Green Belt boundaries (NPPF Paragraph 84). Through the JSP process to date exceptional circumstances to alter the Green Belt boundaries have already been established in order to achieve sustainable development. This should also be the case for non-strategic growth.<br><br>In summary, the approach to include urban fringe locations as well as rural locations is supported as the most appropriate Strategy; this will help support limited growth in areas such as Longwell Green, which has good sustainability credentials due to its proximity to local services and employment opportunities in the East Fringe, but also benefits from its broader accessibility to Central Bristol, Bath and Keynsham. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hanham Community Trust (Land at Hanham Sports Ground) |
| **Comment ID** | 20104449/1353 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | The Plan is at an early stage and so a broad approach to determine potential Non-strategic Development Locations is principally based on access to key services and facilities, along with Flood Risk with areas in Flood Zones 2 and 3 eliminated. From this, 35 settlements/locations have been identified for further investigation through the Local Plan making process.<br><br>It is considered that non-strategic growth should be proportionate to the size and sustainability of settlements, clearly whilst also considering the merits of available sites in each location. A broad spread of sites, in rural and urban fringe locations should be allocated to provide a mix of available housing sites both in terms for size, type and geographical location. This will help ensure that strategic scale growth is complemented and that housing needs across the District are met.<br><br>Further to this, the investigation of locations within and surrounded by the Green Belt is supported. Whilst the NPPF places great weight on retaining Green Belt land, it also highlights the need to promote sustainable patterns of development when reviewing Green Belt boundaries (NPPF Paragraph 84). Through the JSP process to date exceptional circumstances to alter the Green Belt boundaries have already been established in order to achieve sustainable development. This should also be the case for non-strategic growth.<br><br>In summary, the approach to include urban fringe locations as well as rural locations is supported as the most appropriate Strategy; this will help support limited growth in areas such as Longwell Green, which has good sustainability credentials due to its proximity to local services and employment opportunities in the East Fringe, but also benefits from its broader accessibility to Central Bristol, Bath and Keynsham. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hanham Community Trust (Land North of Abbots Road) |
| **Comment ID** | 20107489/1370 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | The Plan is at an early stage and so a broad approach to determine potential Non-strategic Development Locations is principally based on access to key services and facilities, along with Flood Risk with areas in Flood Zones 2 and 3 eliminated. From this, 35 settlements/locations have been identified for further investigation through the Local Plan making process.<br><br>It is considered that non-strategic growth should be proportionate to the size and sustainability of settlements, clearly whilst also considering the merits of available sites in each location. A broad spread of sites, in rural and urban fringe locations should be allocated to provide a mix of |

| | |
|---|---|
| | available housing sites both in terms for size, type and geographical location. This will help ensure that strategic scale growth is complemented and that housing needs across the District are met.<br><br>Further to this, the investigation of locations within and surrounded by the Green Belt is supported. Whilst the NPPF places great weight on retaining Green Belt land, it also highlights the need to promote sustainable patterns of development when reviewing Green Belt boundaries (NPPF Paragraph 84). Through the JSP process to date exceptional circumstances to alter the Green Belt boundaries have already been established in order to achieve sustainable development. This should also be the case for non-strategic growth.<br><br>In summary, the approach to include urban fringe locations as well as rural locations is supported as the most appropriate Strategy; this will help support limited growth in areas such as Longwell Green, which has good sustainability credentials due to its proximity to local services and employment opportunities in the East Fringe, but also benefits from its broader accessibility to Central Bristol, Bath and Keynsham. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | John Mills - Cotswolds Conservation Board |
| **Comment ID** | 19842337/1376 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | The Response of the Cotswolds Conservation Board ('the Board') to Question 3.1. is grouped under two of the headings used in the Consultation Document:<br><br>(i) What about places within the Cotswolds Area of Outstanding Natural beauty?<br><br>(ii) What about rural places within and surrounded by Green Belt?<br><br>**(i) What about places within the Cotswolds Area of Outstanding Natural Beauty?**<br><br>The Board is pleased to see the reference made to the Cotswolds Area of Outstanding Natural Beauty (AONB) in Paragraph 2.64, particularly the statement that '*Careful consideration of the AONB and its setting will be needed to avoid any harmful effects.'* We also support the statement in Appendix 3, Page 106, that '*Sites suggested to the Council which are in the AONB will need to be accompanied by Landscape and Visual, Heritage and Ecological Impact Assessments and have regard to the Cotswolds AONB Management Plan, to ensure the scale and design is appropriate to the AONB.*'<br><br>However, we believe that the Local Plan should be more explicit about the likely limitations on the scale of development that would be permitted in the AONB. For example, the Local Plan should reflect the requirements of pPragraph 116 of the National Planning Policy Framework (NPPF), which states that '*Planning Permission should be Refused for major developments in the AONB except in exceptional circumstances and where it can be demonstrated they are in the public interest.'* The Local Plan should also refer to the assessments required, as a minimum, by Paragraph 116 for major development proposals in the AONB:<br><br>o The need for the development … and the impact of permitting it, or refusing it, upon the local economy;<br><br>o The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and<br><br>o Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.<br><br>In UK Case Law, the meaning of major development, in the context of Paragraph 116 of the NPPF, has been deemed to be a 'Ma*tter of Planning judgment,'* taking into account the potential impact that the development may have on the AONB by reason of its scale, character or nature. However, the Draft Revision of the NPPF that is currently out for Consultation (until 10th May 2018) identifies that development where 10 or more homes will be provided should be defined as major development.<br><br>Regardless of the outcome of the current NPPF Consultation, we believe that the threshold of '10 or more homes' provides a useful guideline for when the requirements of Paragraph 116 of the NPPF should be applied. This should not rule out smaller-scale developments being considered as major development if they are deemed to have the potential to have a serious adverse impact by reason of their scale, character or nature. This is particularly true for smaller villages, such as Cold Ashton, where 10 new homes would increase the number of homes in the village by more than 10%.<br><br>We believe that the major development assessments that are set out in Paragraph 116 in the NPPF should be carried out at the Plan-making stage as well as at the Planning Application stage. This should help to reduce the risk of inappropriate Local Plan site allocations sites in - or within the setting of - the AONB, whilst still ensuring that a more detailed assessment is carried out at the Planning Applications stage.<br><br>In addition to the requirement to 'H*ave regard to the Cotswolds AONB Management Plan,'* the Local Plan should also include a requirement to have regard to the Position Statements and the Landscape Strategy and Guidelines published by the Board. The Landscape Strategy and Guidelines are intended to help decision makers to make informed decisions about the suitability of proposed development in each of the 19 different Landscape Character Types (LCTs) that the Board has identified within the Cotswolds AONB. For the five AONB villages identified as potential locations for development in the Local Plan, the relevant LCTs are as follows:<br><br>o **Cold Ashton**: LCT 4C (Enclosed Limestone Valleys – Lam Brook and St. Catherine's Brook Valleys).<br><br>o **Hawkesbury Upton:** LCT 9D (High Wold Dip Slope – Cotswolds High Wold Dip Slope).<br><br>o **Horton:** LCT 19C (Unwooded Vale – Wickwar Vale) and bordering LCT 2B (Escarpment – Beach Farm to Hillesley). |

| | |
|---|---|
| | o **Marshfield:** LCT 9D (High Wold Dip Slope – Cotswolds High Wold Dip Slope) and bordering LCT 11A (Dip Slope Lowland – South and Mid Cotswolds Lowlands) and 12A (Dip Slope Lowland Valley – Upper By Brook Valley).<br><br>o **Old Sodbury:** LCT 19B (Unwooded Vale – Boyd Valley) and bordering LCT 2B (Escarpment – Beach Farm to Hillesley).<br><br>As with Paragraph 2.62, relating to Green Belt, the Local Plan should explicitly state that 'G***reat weight should be given*** *to conserving landscape and scenic beauty'* in the Cotswolds AONB, in line with Paragraph 115 of the NPPPF. The Local Plan should also refer to the duty on South Gloucestershire Council (and other public bodies), under Section 85 of the Countryside and Rights of Way (CRoW) Act 2000, to *'Have regard to the purpose of conserving and enhancing the natural beauty of the Area of Outstanding Natural Beauty.'*<br><br>As outlined in 'An Independent Review of Housing in England's AONBs 2012 - 2017'1, the Cotswolds AONB is coming under unprecedented pressure from housing development, which is seriously risking the integrity of the natural beauty of the AONB. To ensure that this integrity isn't damaged further, the Local Plan should require development in the AONB to be based on specific evidence of local need arising from within the AONB, rather than being based on a proportional allocation of South Gloucestershire's overall housing need.<br><br>**(ii) What about rural places within and surrounded by Green Belt?**<br><br>The Board is concerned that the Consultation Document appears to give greater weight to Green Belt designation than to AONB designation. For example, Paragraph 2.61 states that *'One option which will need to be investigated is whether the Local Plan should exclude rural places which are within or bounded by the Green Belt*' (i.e. Option 1). However, there is not an equivalent option for excluding rural places which are within – or in the setting of – the Cotswolds AONB.<br><br>Option 1 imposes a much greater burden on the AONB than the other two options, in that 33% of the places that would be used to accommodate the forecast 1,300 new homes, plus the 500 home contingency, would be located in the AONB (compared to 11% in Option 2 and 14% in Option 3).<br><br>Paragraph 14 (including Footnote 9) of the NPPF provides the same level of protection of AONBs as for Green Belt. As outlined above, Paragraph 115 gives *'Great weight to conserving landscape and scenic beauty'* in AONBs, as well as giving AONBs *'The highest status of protection in relation to landscape and scenic beauty.'*<br><br>On this basis, we recommend that the weight given to AONB designation in the Local Plan should be at least equal to the weight given to Green Belt designation. This doesn't necessarily mean having no development in the Cotswolds AONB (i.e. an equivalent of Option 1 for the AONB). However, it does mean that that the Local Plan should provide a more balanced approach when considering future housing development in these two designations. This, in turn, means that Option 1 should be ruled out.<br><br>1 Dixon, D., Sinden, N. and Crabtree, T. (2017) *An Independent Review of Housing in England's AONBs 2012 - 2017.* |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ms. J. Hillier and Barratt Homes (Bristol) Ltd |
| **Comment ID** | 19740673/1379 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | See attached. |
| **Attached documents** | Ms. J. Hillier and Barratt Homes (Bristol) Ltd - Barton Willmore (Miss. Robyn Nicholl).pdf (792 KB) |

| | |
|---|---|
| **Respondent Name** | Carole Tellwright |
| **Comment ID** | 19137633/1392 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Approach to Rural Growth:<br><br>I have significant concerns about the impact of housing development in rural and Green Belt areas.<br><br>I strongly believe these areas should be protected from any development.<br><br>There are no cycling lanes and limited footpaths thereby encouraging dependency on vehicle transport.<br><br>To keep in line with JSP stated achievement goals of 'protection of open countryside and Green Belt' I believe the most appropriate way forward is Option 1 where development is entirely outside of Green Belt areas.<br><br>It is hard to understand what is meant by 'proportional.' 500 homes in 1 rural place would be unthinkable. Village character deserves protection. Once open Green Spaces have been built on they will be lost forever with a consequent negative impact on traffic flow. Road congestion will increase, recreational opportunities lost and resident wellbeing negatively impacted. |

| | |
|---|---|
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | IM Land |
| **Comment ID** | 16638625/1399 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | See attached. |
| **Attached documents** | IM Land - Barton Willmore (Miss. Robyn Nicholl).pdf (564 KB)<br>26926 Vision Document 06.pdf (2.2 MB) |

| | |
|---|---|
| **Respondent Name** | ATA Estates (Longwell Green) LLP |
| **Comment ID** | 19740449/1407 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Please see the enclosed Representations in respect of the Local Plan Consultation Document (February 2018). Please note that separate Representations are being submitted in respect of the Consultation on the 2018 Sustainable Access Methodology and the associated Sustainable Access Profiles. |
| **Attached documents** | ATA Estates (Longwell Green) LLP - Walsingham Planning (Mr. Daniel Sharp).pdf (59.8 MB) |

| | |
|---|---|
| **Respondent Name** | Fear Group |
| **Comment ID** | 19927745/1423 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | We support the proposal for Bitton to be considered for non-strategic growth and, in particular, highlight the opportunities provided by land within the Green Belt which currently is dominated by existing large and redundant structures. We consider that there is potential to provide new homes to meet identified needs and to also provide local services and amenities to enhance the sustainability of both Bitton and Upton Cheyney. We therefore request that the area identified for further investigation as a location for NSD is amended to Bitton and Upton Cheyney. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ian Knipe |
| **Comment ID** | 20133153/1458 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | In principle we support the consideration of both the need to create sustainable patterns of development and the need to take a sequential approach to Flood Risk as potential factors to consider when determining appropriate locations to accommodate non-strategic growth in rural locations.<br><br>We also support the Council's approach at Paragraph 2.62 in acknowledging that, given 61% of the District is Green Belt, that it will be necessary for Green Belt land to be considered for release through the new Local Plan process in order to accommodate the required level of growth from Non-strategic Development Locations (in addition to any release that flows from the broad areas for strategic growth identified in the JSP).<br><br>Appendix 2 to the Consultation Document sets out the Council's approach to creating sustainable patterns of development that avoid isolated rural dwellings. Our Client's site at the East of Bristol meets the aspiration to focus growth at places within and surrounding settlements, and at urban edge places, where key services and facilities and Public Transport connections are present. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mr. Mike Kerton - Bloor Homes South West and Mr. Jeremy Sutcliffe - Baratt |
| **Comment ID** | 16646593/1464 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Please see attached Representations. |
| **Attached documents** | Bloor Homes South West (Mr. Mike Kerton) and Barratt (Mr. Jeremy Sutcliffe) - Barton Willmore.pdf (14.6 MB) |

| | |
|---|---|
| **Respondent Name** | Reginald Pearce, Judith Davis & Rachael Shiles |
| **Comment ID** | 19740897/1478 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |

| | |
|---|---|
| **Comment** | 1) The general approach used to determine the 35 rural places the Council is proposing to investigate for non-strategic growth is supported as is the presentation of the 3 broad options to approaching such investigation in locations inside and outside the Green Belt. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | The Engine Common Trustees (ECT) |
| **Comment ID** | 19741409/1560 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Paras 2.57 and 2.58 indicate that the Council has undertaken an initial "sieve" of sites and excluded sites that amongst other things fall outside the sequential approach to Flood Risk. By this, we take it to mean to exclude all sites that fall in Flood Zones 2 and 3. Appendix 1 indicates that Severn Beach has as a consequence been excluded at this initial stage. We do not, in respect of this particular settlement, consider this to be appropriate; Severn Beach has excellent credentials in transportation terms and an element of further development could be benefits in improving the facilities in this settlement. A balanced view needs to be taken as to the Flood Risk and the particular site our Client is putting forward under the Call for Sites (Site Reference: SG135 - Ableton Lane) benefits from Flood Defences. Elsewhere in the JSP there are significant areas of similarly protected land in Zone 3 that is proposed for housing (e.g. Weston-Super-Mare). |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | M. S. Howes |
| **Comment ID** | 19741377/1571 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Paras 2.57 and 2.58 indicate that the Council has undertaken an initial "sieve" of sites and excluded sites that amongst other things fall outside the sequential approach to Flood Risk. By this, we take it to mean to exclude all sites that fall in Flood Zones 2 and 3. Appendix 1 indicates that Severn Beach has as a consequence been excluded at this initial stage. We do not, in respect of this particular settlement, consider this to be appropriate; Severn Beach has excellent credentials in transportation terms and an element of further development could be benefits in improving the facilities in this settlement. A balanced view needs to be taken as to the Flood Risk and the particular site our Client is putting forward under the Call for Sites (Site Reference: SG135 - Ableton Lane) benefits from Flood Defences. Elsewhere in the JSP there are significant areas of similarly protected land in Zone 3 that is proposed for housing (e.g. Weston-Super-Mare). |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Rockfield Farms Limited (RFL) |
| **Comment ID** | 20069217/1585 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Paras 2.57 and 2.58 indicate that the Council has undertaken an initial "sieve" of sites and excluded sites that amongst other things fall outside the sequential approach to Flood Risk. By this, we take it to mean to exclude all sites that fall in Flood Zones 2 and 3. Appendix 1 indicates that Severn Beach has as a consequence been excluded at this initial stage. We do not, in respect of this particular settlement, consider this to be appropriate; Severn Beach has excellent credentials in transportation terms and an element of further development could be benefits in improving the facilities in this settlement. A balanced view needs to be taken as to the Flood Risk and the particular site our Client is putting forward under the Call for Sites (Site Reference: SG135 - Ableton Lane) benefits from Flood Defences. Elsewhere in the JSP there are significant areas of similarly protected land in Zone 3 that is proposed for housing (e.g. Weston-Super-Mare). |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Downend Estates Limited (DEL) |
| **Comment ID** | 1463137/1596 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Paras 2.57 and 2.58 indicate that the Council has undertaken an initial "sieve" of sites and excluded sites that amongst other things fall outside the sequential approach to Flood Risk. By this, we take it to mean to exclude all sites that fall in Flood Zones 2 and 3. Appendix 1 indicates that Severn Beach has as a consequence been excluded at this initial stage. We do not, in respect of this particular settlement, consider this to be appropriate; Severn Beach has excellent credentials in transportation terms and an element of further development could be benefits in improving the facilities in this settlement. A balanced view needs to be taken as to the Flood Risk and the particular site our Client is putting forward under the Call for Sites (Site Reference: SG135 - Ableton Lane) benefits from Flood Defences. Elsewhere in the JSP there are significant areas of similarly protected land in Zone 3 that is proposed for housing (e.g. Weston-Super-Mare). |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hannah Saunders - Dodington Parish Council |
| **Comment ID** | 19931969/1608 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | **COMMENTS:** |

| | |
|---|---|
| | 3.1 Utilising the approach suggested to determine non-strategic development sites – the areas that possibly match criteria most closely and would impact on the Parish of Dodington are Chipping Sodbury, Frampton Cotterell and Winterbourne. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Taylor Wimpey |
| **Comment ID** | 20068353/1643 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | In principle we support the consideration of both the need to create a sustainable pattern of development and the need to take a sequential approach to Flood Risk as potential factors to consider when determining appropriate locations to accommodate non-strategic growth in rural locations. As mentioned above, we also support the assessment findings that Land at Mangotsfield may be suitable to accommodate such growth due to the lack of Flood Risk and as a sustainable location with good links to Public Transport and local facilities and services.<br><br>We also support the Council's approach at Paragraph 2.62 in acknowledging that, given 61% of the District is Green Belt, it will be necessary for Green Belt land to be considered for release through the new Local Plan process in order to accommodate the required level of growth from Non-strategic Development Locations (in addition to any release through specific Strategic Allocations identified in the JSP).<br><br>We support the approach indicated by the Council at Paragraph 2.62 of the Consultation Document where it is acknowledged that in order to accommodate the level of growth required, it is both necessary and logical to consider options for some non-strategic growth within the Green Belt. Our Client's site at Mangotsfield is identified as one of the Places for Investigation listed at Table 1 on Page 59 of the Consultation Document. It is one of the potential rural sites for non-strategic growth that is 'Outside of the Urban Area.' Appendix 1 details the key issues and analysis for these sites and for Mangotsfield it is identified that the area has suitable access to key services and facilities, the surrounding area is not entirely covered by Flood Zone 3 or 2 and the site should be included as a place for investigation.<br><br>Appendix 2 to the Consultation Document sets out the Council's approach to creating sustainable patterns of development that avoid isolated rural dwellings. Mangotsfield offers the opportunity to meet the aspiration to focus growth at places within and surrounding settlements, and at urban edge places, where key services and facilities and Public Transport connections are present.<br><br>Although we support the identification of Mangotsfield as a suitable location for non-strategic growth, as identified above, we do not consider that the Plan as currently drafted makes sufficient provision for new homes. The level of housing proposed is based on the suppressed housing requirement in the JSP which is not reflective of the OAHN for the area. In our view, additional sources of supply will need to be identified and further sites for non-strategic growth will need to be identified. Including 500 contingency dwellings is not considered sufficient to address this shortfall. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | E. H. Schubert Will Trust |
| **Comment ID** | 12403425/1671 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | The approach adopted should consider, in addition that guidance in the NPPF states that development should be directed 'towards' rather than 'to' specific settlements. There is an important distinction here, given that towards relates to a general direction of settlements whereas 'to' would be a specific Recipient (or in the context of the NPPF), at settlements. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | G. E. Forward |
| **Comment ID** | 20176577/1709 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | There are no new areas for employment in the Hanham Area. There is no Public Transport close to the Green Belt area proposed for development. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Eastwood Park Limited |
| **Comment ID** | 16634689/1749 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | **New Local Plan Policy:**<br><br>The Local Plan Consultation Document includes details of Strategic and non-Strategic Development options in the District. Falfield is considered under the Non-Strategic Development Strategy. Paragraph 2.47 goes on to confirm that:<br><br>"The new Local Plan will need to set out a Strategy to accommodate this level of growth within selected rural communities in South Gloucestershire. This potentially includes rural areas adjacent to the urban edges. The new Local Plan will then need to identify allocation sites to |

| | |
|---|---|
| | ensure delivery and provide certainty of where the growth will take place. The JSP identifies a requirement for 1,300 new homes from non-strategic development sites. The JSP also proposes a contingency from non-strategic sites, comprising an additional 500 new homes. The intention, subject to being confirmed through the JSP, is that the release of the contingency will be considered through the process of Plan Review, conducted every 5 years following adoption. Release of the contingency will only take place where it is demonstrated that housing provision is not being delivered at the levels being planned for and where there would be no reasonable prospect of planned delivery being met otherwise."<br><br>It is welcomed that the non-strategic areas are being considered. These areas have the ability to contribute to the housing need in the District in a proportionate and sustainable way if properly managed. This is especially pertinent following the approach taken in the Draft Joint Spatial Plan which is being prepared in conjunction with this Document.<br><br>**Question 3.1 - 35 Rural Places to be Investigated:**<br><br>The approach adopted by the Council in identifying settlements and locations involves the widest possible range of sites by including the majority of settlements and urban locations within the District. This approach, which includes land within the Green Belt and AONB is supported, as the key determinant must be the creation of sustainable patterns of development, rather than excluding such designated areas without interrogation of the opportunities that might be presented.<br><br>Falfield is identified as a "Place for Investigation" in Table 1 of the Consultation Document and Appendix 1 confirms that the site is extremely suitable when assessed against all the key issues outlined, including:<br><br>o There is some Sustainable Access to Key Services and Facilities.<br><br>o Flood Zone 3 or 2 do not entirely cover the Surrounding Area.<br><br>o Is not in the Green Belt. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David Jonathan Redgewell - TSSA, Bus User UK, South West Transport Network |
| **Comment ID** | 20189249/1781 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Rural Housing:<br><br>Table 1, Page 59, Question 3:<br><br>Support rural Housing sites to improve Affordable Housing at Almondsbury, Alveston, Bitton, Bridgeyate, Chipping Sodbury, Cold ASHTON, Cromhall, Easter Compton, Engine Common, Falfield, Frampton Cotterell, Hambrook, Hanham, Hawkesbury Upton, Horton, Iron Acton, Longwell Green, Mangotsfield, Marshfield, Odd Down, Old Sodbury, Oveston, Pucklechurch, Rangeworthy, Rudgeway, Shortwood, Tockington, Tytherington, Warmley, Westerleigh, Wick, Wickwar, Winterbourne.<br><br>There is a shortage of Affordable Housing in the villages We need to address and the rural economy needs growth in Farming Services to the village such as Post Offices, Shops, Schools, GPs, Churches, Bus Drivers, Coach Drivers (Applegate Berkeley) est Garages, Rudgeway.<br><br>You can not ask the Farmer Works to Drive from Bristol to Gloucester to Milk the Cows or Feed the pigs.<br><br>South Gloucestershire Planners need to understand Rural Policy and the economy.<br><br>Southern Gloucestershire is not the Commuter Village of Surrey for LONDON in this case Bristol.<br><br>Post Office Staff do not need to Drive from Gloucester or Stroud to deliver village mail.<br><br>We need sustainable Village communities.<br><br>Dorset or Somerset County Council or BANES Could help write Rural Policy.<br><br>Alveston has 2 Hotels in the countryside With a need for local Staff, but No Affordable Housing in the Village. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sam Whiting |

| | |
|---|---|
| **Comment ID** | 19936577/1853 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Dear Sir/Madam,<br><br>I am writing to you to convey my concern about your proposed Development Plan for the Longwell Green and Hanham areas of South Glos.<br><br>Firstly I'd like to point out these Plans themselves refer to the sites as non-strategic growth that is growth which is supposed to be small enough to not affect the overall area. However I feel that building on Green Belt land by its very definition change the area in entirely.<br><br>Besides building on Green Belt which in itself is supposed be land in March specifically not for development to keep this for the local community to enjoy and to create a space between the city urban areas, I do not feel that an Affordable Housing crisis can be made better by continually building on Green Belt. This suggestion is a sticking plaster to a national lack of Affordable Housing. I do not believe for a second that Affordable Housing of any significant amount will be built on land that overlooks fields. The houses built will be very expensive big family homes for those that are like enough to afford it. The lack of a specific number of Affordable Homes for these areas indicates that the population at large is not being served by the Council. Given the number of homes to be built in these areas I suggest the Council first target the empty homes rather than build new ones. How many empty homes are there which can be used fully?<br><br>I also believe that there is lack of attention to traffic management and transportation within this specified areas shows a lack of thought by S. Gloucestershire Council. Court Farm Road is a busy country road, it cannot take more traffic during peak hours. If everyone is supposed to drive I assume 3 cars will be allowed on each dwelling's driveway? There is a half-proposed cycle path but this is not definitive and no detail of any proposed bus routes or community facilities such as Schools or Doctors. Presumably this is because it's found that small developments will not have a significant impact? Even though the current Hanham/Longwell Green population is still served with difficulty on current population levels.<br><br>There is also a lack of detail about how South Gloucestershire Council proposes to protect its wildlife in these developments. Bats and certain owls for example are a protected species and any such development near these areas may well affect the population which has not been discussed, Consulted, or thought about. There is no impact assessment or mention of Plans to pursue them.<br><br>I really hope that the Council will reconsider their position to these developments which will change the landscape and cannot be undone once built upon. There are other more efficient and better ways to house and serve your population other than building on never-ending Greenfield sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mr. and Mrs. Drew and Mrs. S. M. Bennett |
| **Comment ID** | 19722081/1884 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | I fully support the approach to achieve proportionate growth in appropriate rural villages to meet the rural housing need requirement of 1,300 dwellings in South Gloucestershire. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tony England |
| **Comment ID** | 20208833/1906 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Please see Representations Document enclosed. |
| **Attached documents** | Mr. Tony England - Barton Willmore.pdf (12.5 MB) |

| | |
|---|---|
| **Respondent Name** | Rachel Sandy - Highways England |
| **Comment ID** | 19831713/1935 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Non-Strategic Development:<br><br>The Consultation Draft notes that 1,300 new homes and potentially small scale employment areas need to be allocated in the new Local Plan. The Consultation Draft sets out the issues related to the location of these allocations, with particular reference to their location in terms of the Green Belt. Three possible Location Strategies are identified. |

| | |
|---|---|
| | Highways England is encouraged that, in the assessment that is reported, there is reference to the assessment the sustainability of the three different proposed Strategies for location. However there is no quantification of the impact of the three Strategies on the Highway Network and in particular, for Highways England, the impact on the SRN or Junctions providing access to the SRN. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | JFG Gunnery |
| **Comment ID** | 19741793/1973 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | The approach adopted should consider, in addition that guidance in the NPPF states that development should be directed 'towards' rather than 'to.' There is an important distinction here, given that towards relates to a general direction of settlements whereas 'to' would be a specific recipient (or in the context of the NPPF), at settlements. This is of relevance to development in the Green Belt given the JSP's acceptance for amending Green Belt boundaries and the role of the SGLP to refine the extent of change.<br><br>Having regard to the 35 Rural Places identified and the relevant Documents used to support their identification including the Sustainability Appraisal evidence we consider that Elberton and the wider surrounding area should be recognised as a location for further sensitively planned development.<br><br>Sites exist (that cannot be defined as 'isolated' by virtue of neighbouring development and uses) that are suited to deliver new homes. As identified at Appendix 2 of the SGLP Consultation, it is recognised that non-strategic site allocations for more than 10 units might be unsustainable. We consider that a lesser number would be reasonable where it helps to deliver homes and supports community services and facilities. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Severnside Distribution Land Ltd (SDLL) |
| **Comment ID** | 16468705/1991 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | *The Local Plan Consultation Document (February 2018 Draft):*<br><br>The JSP strategic housing site allocations are rolled forward into the latest Local Plan Draft (along with the omission of Severn Beach as a strategic housing opportunity).<br><br>The Local Plan then sets out three Spatial options for distributing 'non-strategic growth,' assessed as being 1,300 homes overall. The three options are differentiated solely in terms of the extent of Green Belt incursion. Severn Beach, which lies outside the Green Belt, does not feature in any of the three options.<br><br>All three options would distribute the non-strategic housing growth to locations that are remote from the new jobs in the Enterprise Area. Indeed, the only possible housing growth close to the Enterprise Area is at Easter Compton (indicative 230 homes) under Options 2 and 3. However, this involves a serious incursion into the Green Belt and, even if it were developed, the high sales values in this area are likely to be well beyond the reach of the majority of employees in the Enterprise Area (which are on course to reach in a short space of time).<br><br>The combined effect of the current Drafts of the JSP and the Local Plan would mean that Severn Beach, one of the largest villages in South Gloucestershire, is denied any housing growth in the entire Plan Period to 2036. Given the size of the settlement, its location outside the Green Belt, the presence of its own rail station and the massive job creation on its doorstep, this seems illogical in Planning terms and, potentially, a massive opportunity missed.<br><br>*The Flood Risk Issue:*<br><br>Appendix 1 of the Draft Local Plan appears to confirm that the Severn Beach opportunity has been rejected as a "place for investigation" solely because of Flood Risk considerations. Appendix 1 states that it is 'surrounded on all sides by Zone 3.' At a recent meeting, a Senior Council Director has helpfully confirmed that the case for housing growth in this location is fully understood and that the only issue is a purely technical one i.e. addressing Flood Risk.<br><br>However, SDLL consider that the current Local Plan rejection, seemingly at the first hurdle should, be reconsidered for a number of reasons.<br><br>First, the area is actually currently defined as Flood Zone 3a, which means that it benefits from existing protection i.e. the sea defence. It should be noted that the theoretical Flood Risk relates to coastal effects (there is no fluvial risk) in the event that the sea defence was breached or overtopped. Such protected areas (Zone 3a) are not uncommon and, indeed, large parts of Central London and Central Birmingham are covered by the same designations. More locally, Clevedon, Weston-Super-Mare, Burnham-on-Sea and Bridgwater all include very extensive '3a' areas. These designations elsewhere are not treated as automatic development exclusion zones and, in fact, subject to detailed technical solutions, are the focus of substantial planned developments.<br><br>Second, the JSP/Local Plan's current application of the 'Sequential Test' results in the unsustainable patterns of development identified above i.e. all of the planned new housing is delivered remote from the Enterprise Area, where mass job creation is unfolding. This will result in unnecessary and unsustainable commuting, traffic generation and congestion.<br><br>Third, the outcome of the 'Sequential Test' is premised on the definition of the 'development' being tested. There is an overwhelming Planning and sustainability case for the co-location of homes alongside the new jobs in Central Park. If the 'development' is defined thus i.e. housing to support employment uses, the area of search for suitable sites is, logically, more localised and inevitably includes Zone 3a areas. |

| | |
|---|---|
| | Fourth, Sites M and N, just to the South of Severn Beach have special credentials, given that they enjoy extant Planning Permission to be land raised to facilitate consented development. SDLL fully recognises that the 1957 Consent is for employment purposes (although it does include residential type uses) but its wish is to deliver sustainable housing, rather than the fall back of commercial warehousing (which is not favoured by the local community).<br><br>Fifth, a Planning Application for a joint project to protect the Avonmouth Severnside Enterprise Area and 2,500 homes against the possibility of rare flooding, is about to be submitted. This scheme will enhance existing Flood Defences and reduce Flood Risk further, allowing development opportunities to be realised. This scheme will amend and update the Flood Risk designations in the area.<br><br>Sixth, 'Pre-application' meetings with the Environment Agency (25th April 2018) concerning the residential development of Sites M and N have now been held. A Senior Environment Agency Officer openly stated ***"I do not doubt there is a technical solution."*** SDLL has been encouraged to access the latest hydraulic modelling to test the scheme further. The EA has also confirmed that it will be necessary to manage 'residual risk.'<br><br>In the light of all of the above, there is a strong case to look again at the opportunity of delivering sustainable housing growth at Severn Beach, and Sites M and N in particular, given their good location and special (Consented development land) status.<br><br>*Ecology:*<br><br>SDLL has previously explained that it has undertaken a substantial amount of Ecological Survey work and has liaised closely with Natural England, which has confirmed that housing development can progress on land South of the existing settlement without any undue ecological impact on the protected designated environments.<br><br>*Summary and SDLL Requests:*<br><br>The Planning circumstances that exist in the Central Park/Severn Beach area are simply unique. The success of Central Park and the wider Enterprise Area is unprecedented, delivering thousands of new jobs in a short space of time. Whilst this is positive in terms of economic development, it brings with it the challenges of housing new employees in sustainable locations.<br><br>As currently Drafted, the JSP and Local Plan directs all new housing in the period to 2038 to locations remote from the Enterprise Area. This runs the risk of increasing commuting and congestion and is unsustainable. Locations for housing growth close to the new jobs should be investigated. There is a strong case for defining Severn Beach as a Strategic Development Location for new housing.<br><br>At the very least, Sites M and N (circa 300 units) should be included in the Local Plan's non-strategic planned growth, as it would place new homes in a sustainable location, close to jobs, services and Public Transport, and reduce pressure to release Green Belt sites.<br><br>SDLL considers that the Local Plan does not need to wrestle with the more detailed technical matters, as these will be addressed through Planning Applications, which would be supported by Environmental Impact Assessments, Flood Risk Assessments and Sustainable Drainage Strategies. However, the Local Plan should be recognising the unique circumstances in this area and the strategic and wider sustainability case for housing development on Sites M and N, in terms of complementing employment growth, revitalising an existing community and making the best use of new infrastructure investment.<br><br>SDLL hopes that this Representation will be considered and appropriate amendments made to the Local Plan prior to its submission for Examination. |
| **Attached documents** | Severnside Distribution Land Ltd (SDLL) - PJS Development Solutions Ltd (Phillip Staddon).pdf (2.0 MB) |

| | |
|---|---|
| **Respondent Name** | Sue Hope |
| **Comment ID** | 411169/2034 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | **Part 2:**<br><br>Paragraph 2.8 states that "rural areas… have not had any planned new housing, over and above infill within existing settlements boundaries, for many years." This is true, but it gives a very partial view of the situation. There has been significant non-planned development in rural areas, due to speculative Applications and the failure of South Gloucestershire to maintain a five year land supply. By the time of the conclusion of this Plan; there will be further unwelcome development in rural areas, which brings into question the value of the Local Plan.<br><br>Mention is made that the JSP proposes 500 new houses as a contingency (in Chipping Sodbury) which will be released "only if required." This seems to be an open invitation to developers to land-bank in order to get the contingency released. The Local Plan must state how the Administration intend to avoid such a scenario.<br><br>**Non-Strategic Growth Areas:**<br><br>2.50 499 houses is too large for an upper limit for non-strategic developments in any instance, and that Policies should be put in place to set a lower upper limit. In rural settings, in particular, a development of that size would destroy the character of an existing community and put unsustainable pressure on infrastructure. |

| | |
|---|---|
| | 2.51 The scale of existing settlements should not be the main factor in determining the scale of non-strategic growth. Settlements that have already seen significant recent development may be less appropriate as development locations in many cases than small settlements that are in need of some Affordable Housing in order to survive as communities. It will depend, in each case, on the circumstances and needs of each settlement, including the cumulative levels of recent development. Growth should not be allocated by a simple formula.<br><br>Policies should be put in place to ensure that, in each case, non-strategic developments are built out over the lifetime of the Plan, and not more rapidly. This slower pace of building out will allow communities to adapt more easily to new housing, and also allow small developers and Self-build schemes to compete with larger developers for non-strategic schemes.<br><br>**Non-strategic Housing Lower Limit:**<br><br>Paragraphs 2.53 - 2.54 indicates that 10 houses is the "lower limit" for a non-strategic level of growth and that smaller sites can be suggested for rural settings, but will not count as non-strategic growth. All development of any size in rural settings should count towards non-strategic growth numbers, with no lower limit.<br><br>**Rural Growth – Places for Investigation and Review:**<br><br>There may be reason to include Acton Turville in the list for non-strategic growth; the village has a School, shop and Pub, with aspirations for a community centre, and is surrounded by land in the Call for Sites.<br><br>Non-strategic growth areas should be constantly kept under review and revised.<br><br>Sustainable Transport matters are constantly changing; Parishes, although served by Public Transport, in the Ward is unreliable, does not run after 6.00pm nor on Sundays and is totally supported by a threatened Council budget.<br><br>There are limited employment opportunities in the Ward. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Newland Homes |
| **Comment ID** | 2857441/2048 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | **Approach Towards Non-Strategic Growth:**<br><br>3.7 The fourth element of the SGLP Spatial Strategy requires the delivery of 1,300 dwellings on non-strategic sites, plus a 500 dwelling contingency which will only be released if it is demonstrated that housing provision is not being delivered at the levels being planned for and where there would be no reasonable prospect of planned delivery being met otherwise. For the purposes of the JSP/SGLP, non-strategic development is defined as sites capable of providing between 10 and 499 dwellings. Paragraph 2.55 of the SGLP states that:<br><br>*"For the next stage of the Plan individual sites within and surrounding rural places, which have been submitted to the Council through Call for Sites exercises, will be assessed to understand if they could have potential to be "deliverable" in the Plan Period as a non-strategic site for new homes."*<br><br>3.8 The Green Belt covers 61% of South Gloucestershire District and the SGLP recognises, at Paragraph 2.62, that the Plan will need to investigate places both Outside and Inside the Green Belt as capable of accommodating the non-strategic level growth.<br><br>3.9 Newland Homes are supportive of the inclusion of Green Belt sites in the Council's assessment of places suitable for non-strategic growth and they urge the Council to direct said growth to those areas considered to be the most sustainable.<br><br>3.10 The Council have drawn up an initial list of places for non-strategic growth (contained in Appendix 1 of the SGLP). This list contains all villages, settlements and urban edge places within the rural areas of South Gloucestershire, containing settlements and villages with either defined Settlement Boundaries, or recognised collections of dwellings rather than more general and wider Parish areas. The list also includes rural areas within 400 metres (5 minute walk) of the urban edges of South Gloucestershire, which have existing walking, cycling and Public Transport access to services and facilities, and registered development interest for non-strategic growth, through the Call for Sites process. From this list the Council have ruled out those places with poor access to key services and facilities and/ r within Flood Zones 2 and 3. This leaves the Council with 35 places for further investigation.<br><br>**6.0 CONCLUSION:**<br><br>6.2 In terms of non-strategic growth, Newland Homes support the inclusion of both Green Belt and non-Green Belt places in the Council's assessment. It is felt that the Council should utilise the current Green Belt Assessment evidence and undertake further Green Belt assessment to identify further appropriate Green Belt releases adjacent to the more sustainable locations in the Authority. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alex Atkinson - Edward Ware Homes (Land East of the A4174, Shortwood) |
| **Comment ID** | 19323937/2098 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Edward Ware Homes (Mr. Alex Atkinson) - Pegasus Group (Mr. Daniel Weaver).pdf (2.6 MB) |

| | |
|---|---|
| **Respondent Name** | Alex Atkinson - Edward Ware Homes (Land at Woodhouse Down, Almondsbury) |
| **Comment ID** | 20248001/2119 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Edward Ware Homes (Mr. Alex Atkinson) - Pegasus Group (Mr. Daniel Weaver).pdf (14.4 MB) |

| | |
|---|---|
| **Respondent Name** | Hall and Woodhouse |
| **Comment ID** | 16757633/2164 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | **4.0 NON-STRATEGIC DEVELOPMENT LOCATIONS:**<br><br>4.1 The New Local Plan Consultation Document defines the upper limit of non-strategic growth as 500 dwellings, and the lower limit, at least 10 dwellings. In terms of appropriate levels of growth, the Consultation Document states:<br><br>**"The Council is seeking proportional growth of its existing villages, settlements and rural places, which provides the benefits of growth without significant harm or loss of built and natural assets."**<br><br>4.2 The Consultation Document goes on to describe the Methodology that has been applied in arriving at the 3 broad options for non-strategic development. The Methodology includes:<br><br>o Identifying villages within South Gloucestershire as well as rural areas within 400m of the edge of the urban area;<br><br>o Using the findings of the Sustainability Profiles to ascertain the accessibility of settlements and their potential in creating sustainable patterns of development;<br><br>o Taking a sequential approach to Flood Risk.<br><br>4.3 This broad approach is supported and we note that Warmley is identified as a place for further investigation in Appendix 1 of the Plan as it has sustainable access to key services and facilities and is not in an area of Flood Risk. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Crest Strategic Projects & Crest Nicholson (South West) Limited |
| **Comment ID** | 20274273/2170 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | 9) The general approach used to determine the 35 rural places the Council is proposing to investigate for non-strategic growth is supported as is the presentation of the 3 broad options to approaching such investigation in locations inside and outside the Green Belt. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Newland Homes |
| **Comment ID** | 2857441/2177 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | 3.20 The fourth element of the SGLP Spatial Strategy requires the delivery of 1,300 dwellings on non-strategic sites, plus a 500 dwelling contingency which will only be released if it is demonstrated that housing provision is not being delivered at the levels being planned for and where there would be no reasonable prospect of planned delivery being met otherwise. For the purposes of the JSP/SGLP, non-strategic development is defined as sites capable of providing between 10 and 499 dwellings. Paragraph 2.55 of the SGLP states that:<br><br>*"For the next stage of the Plan individual sites within and surrounding rural places, which have been submitted to the Council through Call for* |

*Sites exercises, will be assessed to understand if they could have potential to be "deliverable" in the Plan Period as a non-strategic site for new homes."*

3.21 The Green Belt covers 61% of South Gloucestershire District and the SGLP recognises, at Paragraph 2.62, that the Plan will need to investigate places both outside and inside the Green Belt as capable of accommodating the non-strategic level growth. The SGLP goes on to state that they will be looking at options for non-strategic growth in and around the rural places which are in the Green Belt.

3.22 The Council have drawn up an initial list of places for non-strategic growth (contained in Appendix 1 of the SGLP). This list contains all villages, settlements and urban edge places within the rural areas of South Gloucestershire, containing settlements and villages with either defined Settlement Boundaries, or recognised collections of dwellings rather than more general and wider Parish areas. The list also includes rural areas within 400 metres (5 minute walk) of the urban edges of South Gloucestershire, which have existing walking, cycling and Public Transport access to services and facilities, and registered development interest for non-strategic growth, through the Call for Sites process. From this list the Council have carried forward 2 places for further consideration, ruling out those places with poor access to key services and facilities and/or within Flood Zones 2 and 3. This leaves the Council with 35 places for further investigation.

**5.0 GREEN BELT ASSESSMENT:**

5.1 Paragraph 79 of the National Planning Policy Framework (NPPF) explains that great importance is attached to the Green Belt, stating:

*"The fundamental aim of Green Belt Policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."*

5.2 The JSP initially looked at options which would not incur any Green Belt release, however this resulted in a Strategy which would entail highly unsustainable patterns of development, would have significant delivery issues and would severely compromise the Plan's objectives.

5.3 The Emerging JSP Spatial Strategy contained in Policy 2 states that the general extent of the Green Belt is to be maintained except where it is required to be amended through Local Plans to enable the delivery of the Strategic Development Locations at Coalpit Heath, North Keynsham, Yate, Bath Road, Brislington and Whitchurch. Newland Homes welcome the realisation that Green Belt release will be required to deliver a sustainable Strategy for the West of England area and more specifically South Gloucestershire where 61% of the area is covered by the Green Belt.

5.4 The SGLP explains at Paragraph 2.61 that the approach to planning for non-strategic growth will recognise the important role of the Green Belt. As discussed in Chapter 3 of these Representations, one option that the Council is investigating through the SGLP is whether sites which are within or bounded by the Green Belt should be excluded from consideration for non-strategic development. However, Newland Homes would contend that this approach could result in a highly unsustainable pattern of development and that the rationale for exceptional Green Belt releases has already been set out by the JSP and Emerging SGLP therefore both Green Belt and Non-Green Belt Locations should be considered, to ensure a sound Local Plan proceeds to Examination.

5.5 Paragraph 80 of the NPPF states that the Green Belt serves five Purposes:

o To check the unrestricted sprawl of large built-up areas;

o To prevent neighbouring towns merging into one another;

o To assist in safeguarding the countryside from encroachment;

o To preserve the setting and special character of historic towns; and

o To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

5.6 An initial Green Belt Assessment was undertaken in 2015 to inform the preparation of the JSP at the Issues and Options stage. This assessment divided the Green Belt into Cells and assessed each of these Cells against their contribution to the five Purposes of the Green Belt.

5.7 The JSP Green Belt Assessment Stage 2 (November 2016) published alongside the Issues and Options Consultation examines specific smaller parcels of land to determine their contribution to serving Green Belt Purposes. This provided the Councils with robust evidence as to the relative merits in terms of those parcels of land assessed and their role within the overall function of the Green Belt. Land West of Bristol Road is located in Parcel 10 in this assessment. (See accompanying Summary Landscape and Visual Appraisal and Landscape Strategy for more details).

5.8 The Assessment's Contribution Rating Section sets out that in order to demonstrate variations between the 'Cells' in terms of the extent of their contribution, a scale with three rating levels was devised – Major Contribution, Contribution and Limited Contributions. The Assessment states of the 'Contribution' rating:

*"Noting that the Green Belt is an extensive designation, not all Cells are likely to be at the front line of making a contribution. The 'Contribution' rating is applicable to those Cells which support the Purposes of Green Belt, particularly in combination with other Cells."*

5.9 Of the 35 rural areas being considered for non-strategic development by the Council, 28 are within the Green Belt. The Table overleaf includes information from the Green Belt Assessment Stage 2. It includes the Cells immediately surrounding each of the 28 small settlements in South Gloucestershire (Note: some of these Cells contain parts of the settlements also) and the overall contribution each of these Cells has been assessed as making to the Green Belt.

Please see the attached Document for the information which is referenced above.

**Area Cell Overall contribution**

5.10 It is interesting to note that the Council is including in their list of potential settlements to investigate for non-strategic development, rural areas which are surrounded by, or within, Cells many of which have been assessed as making a Major Contribution to the Green Belt. The current proposed areas for further investigation in the Green Belt appear inconsistent with the Council's own evidence on the significance of specific Cells

| | |
|---|---|
| | in Green Belt terms and Newland Homes would suggest that the Council should be considering all sustainable settlements, not just 'rural places' and that the focus of site investigation should be towards Green Belt Cells that provide a Limited or Contribution rating in the Green Belt Assessment Stage 2.<br><br>5.11 Newland Homes seriously question the rationale for only planning to focus non-strategic development at rural settlements and to not also consider development at sites within the Green Belt, outside of the SDLs at more sustainable locations such as Thornbury. The Thornbury New Local Plan SDLs: Consultation Report Section 2C states at Paragraph 8.6 that locals mentioned reviewing the Green Belt on the Southern edge of Thornbury. Public Consultation Event They would urge the Council to undertake further Green Belt Assessment work (at a finer grain) to determine the impact and significance of potential Green Belt loss at in Cells that rank as Limited or Contribution and include in this assessment, those Green Belt Cells on the edge of towns which do not form part of the SDLs.<br><br>5.12 Newland Homes are of the opinion that whilst some of the rural settlements being investigated may be appropriate to deliver the necessary growth, the Strategy should be guided by the Council's Green Belt Assessment Stage 2 in the first instance. This will help to identify sites for smaller scale release in locations of limited Green Belt value. This approach would ensure the best Green Belt is retained and the Strategy proceeds on a robust basis.<br><br>5.13 DLP, who are submitting this Response on behalf of Newland Homes, have detailed experience of undertaking Green Belt Reviews for Local Authorities (most recently Pendle District Council). They are therefore aware of the potential pitfalls where LPA's arbitrarily overlook or reject very large Cells that may have suitable options for Green Belt release within them. Newland Homes would therefore encourage the Council to consider all potential Green Belt releases in sustainable locations, even smaller scale ones. This is a strategic issue that needs to be considered comprehensively if the evidence and rationale for Green Belt release is to be robust.<br><br>**7.0 CONCLUSION:**<br><br>7.1 This Consultation Response has set out to highlight that whilst Newland Homes is generally supportive of the delivery of the SGLP they have concerns over key components of the Spatial Strategy and therefore question the overall soundness of this approach. This leads to concern that the SGLP will fail to deliver the required housing figures as detailed in the JSP in the most sustainable way.<br><br>7.2 These Representations have also set out that there is an inherent need to reconsider housing number distribution to appropriately support the identified housing demand and facilitate sustainable growth in this area. In doing this the Council should utilise the Green Belt Assessment evidence to appropriately identify further appropriate Green Belt releases adjacent to the more sustainable locations in the Authority.<br><br>7.3 Land West of Bristol Road, Thornbury is very sustainably located immediately adjacent to the urban edge of the Town Centre with great access to Public Transport, surrounding amenities and local employment. Whilst the land is currently designated as Green Belt, it has been demonstrated that it actually provides a Limited Contribution to the existing Green Belt Purposes. Therefore, in order to meet the housing numbers required, specifically the emerging targets set for non-strategic scale sites, and offer further flexibility in terms of delivery, Newland Homes would suggest sustainable sites such as this should be allocated through the SGLP.<br><br>7.4 The site is currently underutilised. Proposed development within the site would be largely restricted to the South Eastern side, would be of limited extent and would not be generally apparent. It will help deliver both open market and Affordable Homes and it is felt that the site could accommodate a sensitively designed development without significant harm to the Green Belt, Conservation Area and surrounding landscape.<br><br>7.5 It would not lead to urban sprawl or the merger of Thornbury and Alveston. The site also provides the opportunity to enhance the existing Jubilee Footpath with the provision of improved ecological/landscape areas. Based on this site's very sustainable location, and ability to potentially deliver enhancements to the area in terms of recreation and leisure improvements, it is felt this site should be considered suitable for a housing allocation in the SGLP. |
| **Attached documents** | Bristol Rd Thornbury_Summary Landscape Appraisal-Final_Issue 270418.pdf (5.3 MB)<br>SGC_NLP_Feb 2018_Consultation Doc Representations_A5097P_Land West of Bristol Road Thornbury_Newland Homes.pdf (1.4 MB) |

| | |
|---|---|
| **Respondent Name** | Land at Bromley Heath Landowners |
| **Comment ID** | 20293793/2192 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | 4. The general approach used to determine the 35 rural places the Council is proposing to investigate for non-strategic growth is supported as is the presentation of the 3 broad options to approaching such investigation in locations Inside and Outside the Green Belt. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Spitfire Bespoke Homes Ltd |
| **Comment ID** | 19738689/2199 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Question 3 of the Consultation Document looks specifically at non-strategic growth and the Strategy required to accommodate the identified levels of growth in the rural areas, which includes those adjacent to the urban edges. This Representation supports the approach of including non-strategic growth in rural areas as part of the proposed Housing Strategy rather than primarily focusing housing provision on large scale strategic allocations. This allows for a more dispersed sustainable Development Strategy, supporting appropriate levels of development in smaller settlements which offer day to day services and are closer to or well connected to Bristol by various sustainable transport modes. Due to this there is no blanket percentage allocation per settlement instead each area will be assessed on its individual merits and capability.<br><br>The benefits of non-strategic site delivery are well known given that their cumulative impact can make a significant contribution to the supply of housing as they are not prone to the hold ups or reliance of infrastructure delivery that large scale strategic sites are – which often fail to deliver. These smaller sites can come forward much quicker and are able to respond sensitively to existing settlement character and directly to local need, |

without applying huge pressure on existing services, facilities and infrastructure. Provision of these smaller sites opens up the market to small and medium scale house builders who have local and or regional connections to sites, so have to provide a high quality final product. The growth in the small and medium housebuilder sector will reduce the over reliance on the large scale monopoly housebuilders.

In order to determine which settlements are capable of accommodating non-strategic (10 - 500 units) development, which will not strategically alter the rural area and can accommodate proportionate growth without material harm, the Council has undertaken an initial assessment to discount any sites which are not suitable for further investigation. The issues addressed were the current size of the rural areas, their capacity and avoidance of harm in their deliverability – such "harm" included factors such as built and physical assets and local character and their level of sustainable access to local services and facilities.

The initial list of rural areas to be considered is found at Appendix 1 of the Consultation Document and included all sites with defined Settlement Boundaries, recognised collections of dwellings and rural areas within 400m of the urban edges of South Gloucestershire, with existing sustainable transport access.

These sites were then assessed against two Planning issues:

o Creating sustainable patterns of development; and

o Sequential approach to Flood Risk.

The village of Winterbourne where the subject site of this Representation is located performed favourably in this initial assessment. This demonstrates its sustainable access to services and facilities and limited constraints in terms of Flood Risk, whilst noting its location within the Green Belt. Winterbourne is identified as an area to undergo further investigation in terms of non-strategic rural housing potential.

In answer to Question 3.1, which asks if there are any Comments on the approach used to determine the 35 rural places for investigation for non-strategic growth, we would agree with the approach undertaken, particularly as it highlights the potential acceptability of Winterbourne as a sustainable settlement. By definition, non-strategic allocations need to be in areas which are not dependant on significant levels of infrastructure coming forwards therefore sustainable access to services and facilities and their ability to accommodate future demand is an important consideration. This will assist in promoting the vitality and viability of these areas by supporting existing services and facilities and providing Affordable Housing. This is in direct accordance with Paragraph 55 of the NPPF which states:

*"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby. Local Planning Authorities should avoid new isolated homes in the countryside."*

It is further agreed that rural areas located in or surrounded by higher Flood Risk areas should also be excluded from future investigation at this stage, there are clear opportunities to provide the required housing numbers on sites within Flood Zone 1 therefore it is imperative these areas are exhausted before considering areas of higher Flood Risk which will require extensive mitigation and Drainage Strategies and could create cumulative flooding impacts on the surrounding areas.

Overall the approach to determine rural areas for further non-strategic allocations investigation is supported.

As part of the considerations, areas were assessed against their location within or outside of the Green Belt, as 61% of the District is covered by the Green Belt, it is accepted that development both within and outside of it will likely be required to accommodate rural housing numbers. The Council is looking at options for non-strategic growth in and around rural places which are in the Green Belt.

Whilst it is acknowledged that the Green Belt is an important consideration in determining the Growth Strategy for Local Plans other considerations are essential to ensuring the most sustainable form of development. Such considerations include accessibility to services and facilities and whether the level of planned growth is proportional to any given settlement relative to social cohesion and pressure on existing infrastructure. It is also entirely appropriate to ensure that growth takes place in all settlements to maintain their viability for example by supporting services and facilities and providing Affordable Housing. By prioritising the protection of the Green Belt over other issues this could lead to unsustainable patterns of development occurring.

In order to meet the required 1,300 new homes and potential 500 new homes contingency, the Council has undertaken a series of three options to determine the favored approach to rural growth. As aforementioned, a blanket percentage growth approach across all rural places has been discounted, as some areas are clearly more suited to accommodating growth than others. The three options include:

• Option 1 – Outside the Green Belt.

• Option 2 – Within the Green Belt.

• Option 3 – Both Within and Outside of the Green Belt.

**Conclusion:**

In conclusion this Representation specifically addresses the proposed growth in South Gloucestershire at a non-strategic level and supports the Rural Growth Strategy which favours sites both within and outside of the Green Belt. This will allow a more balanced distribution of growth and more sustainable development across the rural areas as well as a more deliverable Strategy going forward.

Supporting growth in rural areas will provide opportunities for smaller developers and prospective Self-build developers to assist in the delivery of homes as well as to support rural community's services and needs for market and Affordable Homes. That is a significant objective of the Government's White Paper.

| | |
|---|---|
| | Greater levels of smaller site provision over a focus on large strategic development areas can make a significant contribution to overall housing numbers and these sites and opportunities should not be overlooked. They can be delivered quickly and are not encumbered by the need for large scale infrastructure provision which can delay delivery.<br><br>Spitfire's site in Winterbourne has demonstrated how this Strategy could be accommodated in the future, despite as with many smaller settlements in South Gloucestershire, its presence in the Green Belt. A Call for Sites Form is enclosed for the proposed site known as Land off the Bristol Road, Winterbourne in accordance with Question 3.5.<br><br>I would be grateful if the above Comments are taken into consideration. If you require any further information please don't hesitate to contact me. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Strategic Land Partnerships/ Mr. S. Jarrett |
| **Comment ID** | 20312833/2206 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | 4) The general approach used to determine the 35 rural places the Council is proposing to investigate for non-strategic growth is supported as is the presentation of the 3 broad options to approaching such investigation in locations Inside and Outside the Green Belt. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Cavendish Homes |
| **Comment ID** | 19756993/2212 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | Please find our Response attached as a PDF. |
| **Attached documents** | Cavendish Homes - SF Planning (Mr. Mark Godson).pdf (562 KB) |

| | |
|---|---|
| **Respondent Name** | Ashfield Land |
| **Comment ID** | 16658689/2278 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | ***Q3. Non-Strategic Growth:***<br><br>***3.1 Do you have any Comments on the approach used to determine the 35 rural places we are proposing to investigate for non-strategic growth?***<br><br>8.23 As we have set out a range of concerns regarding some of the specific locations chosen and these are set out in Paragraphs 4.25 – 4.53 of these Representations. |
| **Attached documents** | Ashfield Land - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (30.0 MB) |

| | |
|---|---|
| **Respondent Name** | Fortannia Ltd |
| **Comment ID** | 19741217/2322 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | ***3.1 Do you have any Comments on the approach used to determine the 35 rural places we are proposing to investigate for non-strategic growth? (Please see Paragraphs 2.56 - 2.66 and Appendices 1, 2 and 3)***<br><br>The approach adopted should consider site is Green Belt. Guidance in the NPPF states that development should be directed 'towards' rather than 'to.' There is an important distinction here, given that towards relates to a general direction of settlements whereas 'to' would be a specific recipient (or in the context of the NPPF), at settlements. This is of relevance to development opportunities in South Gloucestershire's Green Belt given the JSP's acceptance for amending Green Belt boundaries and the role of the SGLP to refine the extent of change.<br><br>It is noted that in the SGLP, Paragraph 2.61 suggests that in retaining Green Belt, an option for consideration would be to exclude rural places that are within or bounded by Green Belt. To be clear, this runs against Government guidance given that under "very special circumstances" development in the Green Belt can be approved. And, to support this, Paragraph 86 of the NPPF advises on the treatment of development that is being directed to villages in the Green Belt. However, we recognise and support the provisions of SGLP Paragraph 2.62 where the delivery of the 1,300 new homes and contingency of 500 homes will require sites within the Green Belt to be investigated.<br><br>We welcome Alveston as a settlement to which non-strategic growth is to be considered. Non-strategic growth is, we understand, development of up to 499 homes.<br><br>It is clear that Alveston has both the potential to accommodate suitably located development supporting existing facilities and their future growth and expansion. |

| | |
|---|---|
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Redrow Homes South West, Julia Wallington, Debra Turner, Andrew Williams, Chr... |
| **Comment ID** | 20167105/2343 |
| **Document Part Name** | Question 03.1 Do you have any comments on the approach used to determine the 35 rural places we are proposing to investigate fro non-strategic growth? |
| **Comment** | 8.23 As we have set out a range of concerns regarding some of the specific locations chosen and these are set out in Paragraphs 4.23 – 4.51 of these Representations. |
| **Attached documents** | Redrow Homes South West and Others - Grass Roots Planning (Mr. Matthew Kendrick).pdf (7.2 MB) |

| | |
|---|---|
| **Respondent Name** | Kevin Wood |
| **Comment ID** | 19176641/14 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Outside Green Belt. The Green Belt must not be sacrificed. Brownfield and infill should be the first choice for any development. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Julia Wood |
| **Comment ID** | 19176609/15 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Green Belt must be preserved. Only Brownfield development and infill should be permitted. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Becky Elderton |
| **Comment ID** | 19140513/18 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | It is imperative that Green Belt (and Greenfield) land is protected at all costs. Brownfield and Infill only should be explored under exceptional conditions. Any building development that takes place close to villages and hamlets results in inevitable village "sprawl." Villages like Tockington and Olveston are already suffering from increased traffic and noise pollution and are used as a "cut-through" by commuter-traffic coming from South Wales into Bristol. It is anticipated that this might become worse after the Severn Bridge Tolls have been stopped. Public Transport links cannot be relied upon, bus companies are notorious for changing/pulling the plug on their routes. Locals from new housing developments will continue to use their cars thus exacerbating the traffic problems. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Chris Stutter |
| **Comment ID** | 19209793/23 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | I support Option 2 (Inside the Green Belt) for non-strategic growth. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anne Tyrer |
| **Comment ID** | 19338689/38 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 1 - All development should be outside the Green Belt. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Chris Stow |
| **Comment ID** | 877825/41 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 3 would be the sensible approach. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kate Kelliher |
| **Comment ID** | 6031873/47 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Mainly outside the Green Belt, but within the Green Belt, perhaps, where older people may wish to downsize. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Martin Swinburne |
| **Comment ID** | 10327617/52 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | I support Option 3. Most of the non-Green Belt land lies to the North of Yate and Thornbury. If you limited development to just non-Green Belt you would be pushing all the non-strategic growth further away from Bristol where people are likely to work. Increasing the travelling distance to work doesn't make any sense.<br><br>Also there are areas not designated as Green Belt which are used as rural amenities by local residents. A good example is Engine Common. A network of lanes, footpaths and bridlepaths runs across the Common which is used by dog walkers, cyclists, horse riders and joggers. The area is used by many residents of North Yate and Brimsham Park; it would be missed if it was swallowed by suburbia. Whereas I'm sure there are some fields within the Green Belt that are not used by anybody. My point is you cannot use a broadbrush appraoch of Green Belt/non-Green Belt. You need to look at each location and decide whether there is an impact upon the whole community. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Margaret Pinder - Sustainable Thornbury |
| **Comment ID** | 19372321/56 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | We support Option 3 (both Inside and Outside the Green Belt) in order to spread the development across more villages to ensure that no one place is disadvantaged. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Richard Hartill |
| **Comment ID** | 19376225/73 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Only Option 1 should be considered. There are large numbers of non Green Belt land in the area that could be used for housing development. Green Belt land should only be considered if all non Green Belt sites and possible sites are exhausted. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mr. Hawthorn |
| **Comment ID** | 14671265/79 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 1. As stated in my earlier Comments, building inside the Green Belt puts more strain on the existing infrastructure which is already unfit for purpose and in respect of which there are limited options for improving. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Rosalyn Pyle - Warmley and Siston Community Garden Group |
| **Comment ID** | 11362209/83 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 1:<br><br>Only housing development outside the Green Belt should be considered on Brownfield sites. Existing infrastructure is already struggling on the Eastern Fringes of South Gloucestershire. Our ancient Commons and their individual identities will not survive if existing Green Spaces are not protected and are sacrificed to fulfil demand for housing. It is essential to keep the Bristol to Bath Green Belt intact to prevent urban sprawl. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Richard Rogers - Olveston Parish Council |
| **Comment ID** | 1060833/85 |

| | |
|---|---|
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **The key issues are meeting <u>genuine</u> local needs for development and ensuring that the scale of development is <u>strictly</u> proportionate to the scale and function of individual settlements. These issues will apply both to settlements beyond the Green Belt and settlements within the Green Belt. Accordingly, we accept the logic that Option 3 should be selected**. This Option also has the advantage of spreading the number of dwellings required across more settlements and reducing the number needed in any one place.<br><br>Local needs and scale of development are covered under Question 3.4. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mayers |
| **Comment ID** | 16271713/92 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 1 should be considered. People live in the small villages to get away from people and live peacefully, not for it to be turned into an Estate full of people creating more crime (just like it has in Thornbury) and a less enjoyable environment to live in (hence many people trying to get away from Thornbury now). The villages have been the same for many years and this should be preserved along with the rustic feel with the Listed Buildings. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Jodie Bailey - Pucklechurch Parish Council |
| **Comment ID** | 1061057/95 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 1 - Outside the Green Belt. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Claire Normoyle |
| **Comment ID** | 7883105/111 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option One should be used. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anne Gale |
| **Comment ID** | 16344321/123 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Brownfield sites only. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mrs. Hartill |
| **Comment ID** | 19433889/139 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 1 only. Green Belt land should be retained for future generations. This includes the Hanham site (and precludes any building on the Hanham Hills). Brownfield land such as the old Kleeneze site would be far preferable for Hanham and whilst it sits unused, it would be irresponsible to destroy areas of natural beauty in the Green Belt. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Thomas Robertson |
| **Comment ID** | 19434017/140 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 1 (Outside the Green Belt). Building on Green Belt land is inappropriate, Brownfield land should be used instead. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Melinda Evans |

| | |
|---|---|
| **Comment ID** | 10398721/142 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 3 seems the fairest way to spread development across the South Glos area. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Martin Gillian |
| **Comment ID** | 19445537/147 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 3 for non-strategic growth. Keep the discussion wide and inclusive. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Julian Round |
| **Comment ID** | 19328513/157 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 3.<br><br>Proportionate growth cannot be maintained with either the 'inside-only' or 'outside-only' options. The 'outside-only' option is especially untenable, where the 12 villages would have to absorb over 100 (i.e. 1,300/12) houses each, on average, to hit the target of 1,300 homes. This, by definition, is not proportionate growth.<br><br>The non-strategic sites in the AONB (of which there are only 5 within the current 35) should be given special consideration with regard to the target number of houses and size of proposed sites.<br><br>As I stated in my feedback to Question 3.1, more villages should be brought into scope to better enable proportionate growth in all the non-strategic sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Clive Twist |
| **Comment ID** | 19276513/158 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 1 - Non-strategic growth should be investigated outside of the Green Belt.<br><br>Development of Green Belt land is unsustainable development. Protecting it has many benefits including:<br><br>- Protects land that is actively farmed (made strategically more important in the light of Brexit).<br><br>- Protects rural communities that have existed for hundreds of years.<br><br>- Prevents Urban sprawl.<br><br>- Provides access to green spaces for local residents (Made strategically more important given the alarming increases in mental illness).<br><br>- Protects Biodiversity.<br><br>- Protects Air Quality from pollution (Made strategically more important, given recent Air Quality Reports being outside of the safe guidelines). |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sinead Grogan |
| **Comment ID** | 19451393/159 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |

| | |
|---|---|
| **Comment** | Option 1 - Non Strategic Growth should be investigated Outside of the Green Belt.<br><br>The Green Belt should be protected for a number of reasons including:<br><br>- Protect active farmland - to secure UK's strategic food supply following Brexit.<br><br>- Protect ancient rural communities.<br><br>- Protect Green Spaces, enabling them to be enjoyed by local residents and future generations.<br><br>- Prevent urban sprawl.<br><br>- Avoid further deterioration of air quality to dangerous pollution levels.<br><br>- Protect Biodiversity. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Thompson |
| **Comment ID** | 17795873/164 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | iii. Option 3. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Dawn Brooks |
| **Comment ID** | 14860161/174 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | I fully support the Planning Policy that looks at sites both Inside and Outside of Green Belt. Marshfield and places of similar size need new housing opportunities especially affordable and shared ownership if they are to survive and grow. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Richard Hunter |
| **Comment ID** | 19451841/175 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | 3.2 Option 1 selected. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christopher Tippetts |
| **Comment ID** | 19452065/178 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | We should not build upon the Green Belt. We should preserve the Green Belt for future populations to enjoy. Now that Brexit is on the horizon we will need to retain more land for farming in the future. Buckover Garden Village is an example of this negative decision making by SGC. We should not allow developers to renegotiate downwards the number of proposed Social Housing units once Outline Planning is granted. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Lyn Haigh - Rangeworthy Parish Council |
| **Comment ID** | 2301601/184 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 3 appears the most likely to preserve the nature of villages by spreading the burden between them. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christopher Tippetts |
| **Comment ID** | 19452065/191 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 1 is my choice. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Philip Box |
| **Comment ID** | 19453025/196 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | This approach should not be defined in relation to Green Belt status, but rather Brownfield and empty home potential. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Carolyn Baker |
| **Comment ID** | 17252193/206 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 1 - Outside the Green Belt. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tamzen Bury |
| **Comment ID** | 19416385/215 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | I believe Option 1 is best, as I do not think we should be developing on Green Belt areas. This is due to the need to retain green spaces for the environmental benefits, protection of wildlife there being plants or animals. People should be encouraged to do more exercise and spend time outdoors, such as walking across fields or down to the river. Surely this is preferential to having to get in the car to go to the gym? Also elderly people that have dogs enjoy walking them in fields, and may not be stable enough to walk them through woodlands. I think it's really important to retain our green field spaces. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Neil Emerson |
| **Comment ID** | 19454049/223 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | All of the named areas have limited or poor transport and minimal local employment opportunities. Therefore all the additional residents the developments will bring, will require car travel. Many of the villages have no Primary Schools and most no Secondary Schools so again more car travel.<br><br>1,800 additional houses is too many for the rural areas. As a minimum a Primary School needs to be a requirement and/or Public Transport that meets employment's needs for a site to be viable. A minimum requirement for Public Transport would need to be 7am to 7pm.<br><br>If any area does not meet these minimum standards they should not be considered.<br><br>However if rural areas are required they should be spread across as many areas as possible to minimise the road congestion. In South Glos Green Belt is a meaninglessness concept as many of the villages outside the Green Belt, have as much green areas as those included.<br><br>Therefore Option 3 would be the most damaging choice. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Neil Emerson |
| **Comment ID** | 19454049/224 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | All of the named areas have limited or poor transport and minimal local employment opportunities. Therefore all the additional residents the developments will bring, will require car travel. Many of the villages have no Primary Schools and most no Secondary Schools so again more car travel. |

| | |
|---|---|
| | 1,800 additional houses is too many for the rural areas. As a minimum a Primary School needs to be a requirement and/or Public Transport that meets employment's needs for a site to be viable. A minimum requirement for Public Transport would need to be 7am to 7pm.<br><br>If any area does not meet these minimum standards they should not be considered.<br><br>However if rural areas are required they should be spread across as many areas as possible to minimise the road congestion. In South Glos Green Belt is a meaninglessness concept as many of the villages outside the Green Belt, have as much green areas as those included.<br><br>Therefore Option 3 would be the least damaging choice. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | John Hart |
| **Comment ID** | 19454113/225 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 3 provides the best solution and is the one I choose. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Gillian Sanders - Wessex Water |
| **Comment ID** | 19455361/231 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | If Option 2 or 3 is taken forward for non-strategic growth location, we would note that this could give rise to the need to develop new or expand existing operational waste water sites and assets within the Green Belt. We would welcome recognition and Policy support within the Local Plan that development of essential water supply or sewage treatment infrastructure within the Green Belt is necessary to support the growth identified in the Local Plan. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Leslie Forrest - Campaign to Protect Rural England South Gloucestershire Dist... |
| **Comment ID** | 16478497/244 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | CPRE supports Option 1. Development within the Green Belts is at higher levels than ever before despite the assurances given by National and Local Government. This area does not have a good record in protection of the Bristol Bath GB; the last revision lasted no more than four years. Including villages within the Green Belt as suitable for expansion will not as the Document hints, result in a more even spread and a smaller scale impact on the other settlements, it will widen the selection available for speculative development and result in the loss of even more Green Belt land. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Helen Johnstone - Stroud District Council |
| **Comment ID** | 14317537/251 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | 1. Option 3 (Both Inside & Outside the Green Belt). |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ann O'Driscoll - North Bristol SusCom Ltd |
| **Comment ID** | 5846881/269 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 3 as this gives the broadest range of options to consider. We would like to see locations chosen that have good sustainable transport links or will get better links put in a part of any development. It is vital that we achieve #GrowthWithoutGridlock and enable people to travel in more sustainable and healthy ways. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Louise Seaman - Mactaggart & Mickel |
| **Comment ID** | 19457953/273 |

| | |
|---|---|
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | M&M believe that Option 2 should be carried forward. In this respect M&M control land at Poplar Farm. That land is within the Green Belt but we believe that it plays a limited contribution to the 5 Green Belt functions. A new Green Belt boundary can be defined using physical features which are readily defined in accordance with Paragraph 55 of the NPPF. Furthermore, we would Comment:-<br><br>1. Greenfield sites are required to meet the JSP's housing requirement. However, we believe that a proper landscape analysis of the site reveals that whilst the site is part of the Frome Valley Landscape Character Area that it does not strongly display distinctive features of landscape character area. Furthermore, the site has been in active agricultural use for many years and again the site does not exhibit the peaceful/tranquil character that is typical of the wider character area. The site is urban or peri-urban fringe and suffers from trespass which makes continued agricultural use difficult to manage;<br><br>2. There are no Listed Buildings within the vicinity of the site;<br><br>3. There are no Overhead Power Lines/pylons which would affect development of the site; and<br><br>4. Whilst it is accepted that there would be traffic generated as a result of development of the site, this is the same with any Greenfield development site. Initial consideration of the transport impact is that it can be satisfactorily mitigated and would not have a severe effect on the surrounding Highway Network i.e. Winterbourne High Street.<br><br>In view of the above, we believe that land at Poplars Farm, Frampton Cotterell should be released from the Green Belt and identified for residential development, in accordance with the Vision Document. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Emma Jarvis |
| **Comment ID** | 2745345/281 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | ii Option 2 (Inside the Green Belt): As identified in the Document these places are closer to the urban edge, have better walking and cycling access to most key services and facilities and are better connected to Public Transport. Development of some of these villages has been hindered by being in Green Belt over time and some villages may welcome the opportunity for a little expansion to support their village Schools and shops. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Leigh-Ann Jones - Caleva Land Ltd |
| **Comment ID** | 11723201/285 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 2 Rural Places Inside the Green Belt:<br><br>'There is a clear logic in identifying small deliverable sites very close to the urban edge of Bristol (and its economic opportunities) as opposed to those that leapfrog the Green Belt and are a significant distance from North Bristol but which the Council considers to be suitable (and, presumably sustainable) to allocate, such as Buckover and North Thornbury. The Council must consider fully the delivery of new homes in the Green Belt. A Strategy which places homes outside of the Green Belt in new settlements or urban extensions is, by its very nature unsustainable. The Local Plan 2018 - 2036 clearly says that a change to Planning is needed to avoid issues such as 'High Car use and limited Public Transport options to employment areas and other services are leading to increasing pressure on the Transport Network and significant problems with community isolation, congestion and poor air quality' surely this will continue to be an issue if the Council continues to maintain a preference for developing sites which are a significant distance from North Bristol where the majority of employment sits (i.e. Buckover and North Thornbury).<br><br>There are more suitable, locations closer to the main employment hubs of North Bristol and Central Bristol; such as Almondsbury, which is only a short distance away from the Northern arc of Bristol and, notably the major employment areas of Aztec West and Filton. Almondsbury has good road access via the B4099 and its location is closer to key employment areas than the identified 'Strategic Development' sites of Buckover and the planned expansion of Northern Thornbury. It is therefore in comparison to those development areas a sustainable location.<br><br>Under the Local Plan 2018 - 2036 Almondsbury has been identified as a 'Rural Place' which can be considered for non strategic developments and has good access to key services, shops, transport, infrastructure etc. However under the Local Plan the criteria of assessing suitability of non strategic sites, deems only sites located within 200 metres of existing Settlement Boundaries to be suitable, this means many locations will be dismissed without further consideration, as they will be deemed as too 'isolated.' Almondsbury is situated on the main B4099 which provides good access links for residents living both inside and outside of the village. The ease of access has drawn a number of businesses to Almondsbury and the Business Sector has developed rapidly providing opportunities for employment by major and smaller companies within Almondsbury; including, Hydrock, Ibstock Brick Company, Bristol Water and Over Court Barns Business Centre, along with other local rural businesses and enterprises, which the Government is encouraging in rural areas. These companies are located to the South of Almondsbury Village on the B4099, which is approximately 1 - 1.5 miles outside of the existing Settlement Boundary. These businesses are close to other residential dwellings and yet any sites proposed for housing development in close proximity of these businesses, would automatically be disregarded under the Local Plan, criteria assessment for non strategic sites; as despite being surrounded by businesses and existing dwellings, the location would be more than 200 metres outside of the existing Settlement Boundary and deemed to be too 'isolated' - this seems a contradiction in itself. |

| | |
|---|---|
| | To provide sustainable housing and support businesses in Almondsbury, the existing Settlement Boundary should be extended to encompass the Business Sector at Over Court Barns Business Centre, Sanday's Nurseries, Ibstock Brick Company and Bristol Water. If expanding the existing Settlement Boundary is not an option, then South Gloucestershire Council should recognise 'Over' as an independent village in its own right, with a clearly identified Business Centre and established settlement. South Gloucestershire Council needs to give more consideration to smaller sites which can deliver homes in close proximity to major employment areas. These sites should be considered positively – set against other Planning-related considerations. The development of these sites would provide the most benefit to the residents of South Gloucestershire and the local economy. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Lesley Brown |
| **Comment ID** | 16384673/289 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 1 should be preferred in line with the Government's stance on protecting Green Belt except in EXCEPTIONAL circumstances when all Brownfield sites have been exhausted. The Council's last Local Plan stated that Green Belt should remain. However, it has now decided to build 1,800 houses on much recreationally used Green Belt in Coalpit Heath which is totally disproportionate to the existing numbers and with insufficient infrastructure. No more Planning should involve Green Belt. The Council should use whatever means possible to deter developers who are looking to maximise profits with little care for the communities they destroy. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Joanne Plumbley |
| **Comment ID** | 19466625/302 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | I would support Option 3 as the least damaging of the options.<br><br>The number of houses proposed will seriously damage the natural environment and for many of the villages listed be unsustainable given the poor transport and amenities..All of the named areas have limited or poor transport particularly outside of working hours and minimal local employment opportunities. Many of the villages have no Primary Schools and most no Secondary Schools so again more car travel.<br><br>If any area cannot offer adequate Public Transport and access to amenities such as Doctors, shops, and Schools they should not be considered.<br><br>However if rural areas are required they should be spread across as many areas as possible to minimise local impact.<br><br>Whilst I strongly believe the target number of houses will destroy many of the attributes of the South Glos areas, I select option 3 as preferable to the alternatives. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sarah Blackmore |
| **Comment ID** | 16193889/308 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Ideally these sites should be outside the Green Belt, however, to realistically build the number of homes that South Glos require it seems that consideration has to be given to development both Outside & Inside the Green Belt. However, any development within the Green Belt must be given very careful consideration to ensure that sites are integrated with local surroundings & are fully sustainable with access to good transport links and services. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Gardener-Wollen |
| **Comment ID** | 19466913/315 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | I would like to support the Non-Strategic Growth Option 3 of investigations both Inside and Outside of the Green Belt. Our village of Hawkesbury Upton is under extreme pressures from speculate land agents with greed to develop land in designated AONB site without exceptional circumstance.<br><br>**Non-strategic Growth:**<br><br>The Parish is in the process of producing a Neighbourhood Plan and Community Land Trusts. |

| | |
|---|---|
| | it is being proposed that 1,300 homes need to be built in non strategic sites (i.e. small villages, such as Hawkesbury Upton) over the next 18 years. There are 3 options in the Consultation - one for development Inside Green Belt only (currently 28 villages proposed), one for development Outside Green Belt only (currently 12 villages proposed) and one for development Inside and Outside the Green Belt (currently 35 villages proposed).<br><br>it is being proposed that 1,300 homes need to be built in non strategic sites (i.e. small villages, such as Hawkesbury Upton) over the next 18 years. There are 3 Options in the Consultation - one for development Inside Green Belt only (currently 28 villages proposed), one for development Outside Green Belt only (currently 12 villages proposed) and one for development Inside and Outside the Green Belt (currently 35 villages proposed).<br><br>Paragraphs 2.53 - 2.54 indicates that 10 houses is the “lower limit” for a non-strategic level of growth and that smaller sites can be suggested for rural settings, but will not count as non-strategic growth. All development in rural settings should count towards non-strategic growth numbers, with no lower limit.<br><br>• We need to reduce the upper limit to ensure development remains proportionate and we remove the risk of small villages becoming small towns (which incidentally is a Policy in the Local Plan (i.e. they don't want this type of big development in our small villages)).<br>• We need to include EVERY home towards the target of 1,300 - why should a development of 2 or 3 homes not count? - because it's possible small villages can deliver their total allocation in small chunks like these, without needing groups of 10 or more.<br>• Questions 3.1 and 3.2 relate to this issue.<br><br>Appendix 2:<br><br>Non-strategic growth areas should be constantly kept under review and revised.<br><br>Sustainable Transport matters are constantly changing; the Parish although served by Public Transport, it is unreliable, does not run after 6.00pm nor on Sundays and is totally supported by a threatened Council budget.<br><br>The local village shop is a community enterprise, run with the help of volunteers.<br><br>There are very limited employment opportunities. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | B. Gardener-Wollen |
| **Comment ID** | 19466977/317 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | I would like to see Option 3 (Both inside & Outside of the Green Belt).<br><br>If all 55 villages do their part, we ensure that villages develop more naturally, and help preserve the AONB and historical villages.<br><br>Paragraphs 2.53 - 2.54 indicates that 10 houses is the “lower limit” for a non-strategic level of growth. It goes on to say that smaller sites can be suggested for rural settings, but will not count as non-strategic growth. All development in rural settings **should** count towards non-strategic growth numbers, with **no** lower limit. The NPPF defines a major development as 10 or more dwellings inside of the AONB, major developments should not be promoted in rural villages, and not in the AONB. Why can't we meet any housing requirements with lots of small infill in each village?<br><br>In my opinion non-strategic growth areas should be constantly kept under review and revised and all buildings should be built with access to Superfast Broadband and not be limited developments in excess of 10 dwellings. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sarah Blackmore - VALID Action Group |
| **Comment ID** | 19467105/321 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Ideally these sites should be outside the Green Belt, however, to realistically build the number of homes that South Glos require it seems that consideration has to be given to development both Outside & Inside the Green Belt. However, a development within the Green Belt must be given very careful consideration to ensure that sites are integrated with local surroundings & are fully sustainable with access to good transport links and services. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Hicks - Falfield Action Group |
| **Comment ID** | 16618369/325 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 3 (Both Inside & Outside the Green Belt). |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Hicks - Falfield Action Group |
| **Comment ID** | 16618369/326 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Option 1:**<br><br>Is not acceptable as it would result in between 1,300 and 1,800 homes being built in just 12 villages - even spread that would be potentially 150 each. Many of these locations are small and lack facilities and amenities and have poor, unreliable and non-guaranteed (services changed and removed as seen fit by those managing the service) Public Transport to major employment areas and Shopping Centres. This Option would ruin the rural characters of these villages, 7 of which have 180 or fewer dwellings. It should also be considered that 150 dwellings would be unlikely to see developers being prepared to invest in any additional infrastructure or facilities, thus offering no benefits to local residents or reduction in reliance on the motor car.<br><br>It is also proposed that the North of the Authority provides 3 SDLs (Yate, Thornbury & Buckover) which will have a significant impact on local areas, infrastructure and amenities, hence further large scale development in local villages will add to pressures the SDLs will already have increased.<br><br>**Option 2:**<br><br>This Option offers a smaller number of locations so increases the likely number of houses to be built in each location - if evenly distributed this would be 64 each. The locations are however, more sustainable as they are closer to the urban areas and have better facilities, amenities and Public Transport.<br><br>**Option 3:**<br><br>This is our preferred Option as with a larger pool of rural locations in which to locate residential development, using the fair distribution view, the potential number of dwellings per location is reduced to 52. For less sustainable locations the developments will not alleviate the need to use the private motor car, however the impact on communities and the character of these rural areas will be felt less. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Claire Young |
| **Comment ID** | 916289/336 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | In line with my Response to the JSP Consultation earlier this year, I believe that development should be distributed widely, to avoid undue pressure being put on some communities, to ensure the scale of the development is at a level that the communities can absorb and to ensure small villages are not left to stagnate. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David White |
| **Comment ID** | 5522945/354 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 2 to make extension of transport infrastructure out from Bristol more realistic as that is where most will be working. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tristan Clark |
| **Comment ID** | 19194177/357 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 3 (Both Inside & Outside the Green Belt). |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anna Donaghey |
| **Comment ID** | 19467297/364 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 3 is the preferred choice. The only choice. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Caroline Brewser |
| **Comment ID** | 10284257/380 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | If you do decide to investigate sites both inside and outside the Green Belt, I think that more housing should be placed outside the Green Belt than within it - otherwise there was little point in designating it as Green Belt in the first place. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Jill White |
| **Comment ID** | 10710785/383 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 2. Most people work in Bristol and land closer to Bristol should be considered for development. If small rural areas are overwhelmed roads into Bristol become even more congested with people trying to get to work as the Public Transport system is inadequate. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kit Stokes - Stokes Morgan Planning Ltd |
| **Comment ID** | 19451073/387 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 2 (Inside the Green Belt). The release of land within the Green Belt (if a Sequential Test is adopted to ensure the least sensitive sites are chosen) would ensure that the most sustainable locations can be chosen. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mark Roper - T. Roper & Partners |
| **Comment ID** | 19467489/389 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 3 should be adopted with each area selected on an individual basis for merits and impact. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Dean Simmonds |
| **Comment ID** | 19467521/393 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Given my Response to 3.1 - the preferred Option is 3. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Simmons - Westerleigh Parish Council |
| **Comment ID** | 17221409/401 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **3.2 Select one option that we should use to investigate sites for non-strategic growth?**<br><br>**WPC understands that Option 3 will be most likely to deliver the additional 1300 - 1800 homes needed across the 35 areas although this is almost a 10% increase.**<br><br>**Areas inside the Green Belt should be very carefully considered with Applications subject to additional Planning requirements.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ann Barker |
| **Comment ID** | 19784257/425 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | I believe that Option 3 will provide the most flexibility and choice for SGC when identifying the most suitable sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alveston, Rudgeway, and Earthcott Parish Council |
| **Comment ID** | 19784545/432 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Option 1** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Peter Rawlinson - Gleeson Strategic Land Limited |
| **Comment ID** | 19328353/450 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Gleeson agrees with the Council's assessment that the number of new homes required across smaller sites will necessitate non-strategic growth in and around rural places which are in the Green Belt. It will also be important to be flexible with site selection for those settlements that are partly surrounded by the Green Belt. For example at Marshfield Gleeson considers that its site at 'Land East of Marshfield' on the East side of the village is the most suitable direction for growth, despite its Green Belt location, because it is free from other constraints that restrict the development potential of other alternative sites.<br><br>Gleeson recognises that areas outside the Green Belt need to be investigated for their development potential but cautions that this is unlikely to result in the best development option for South Gloucestershire. As stated by the Council in the Consultation Document many of the settlements outside the Green Belt are poorly located for walking and cycling access to local services and facilities and will require a greater reliance on Public Transport, which is less successful in creating a modal shift away from car use.<br><br>Taking into account the potential positive and negative impacts from the three options for site investigation Gleeson's view is that Option 3(Both Inside & Outside the Green Belt) is the most suitable for investigating new non-strategic growth sites. Option 3 recognises that it is necessary to find the most suitable sites, taking into account the various constraints but not discounting sites at this early stage because of them. At later stages sites should be investigated more closely to determine which rural settlements are the most suitable for additional growth and which sites at those settlements are best placed to deliver that growth in the most sustainable way. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Donna Ford - Iron Acton Parish Council |
| **Comment ID** | 1060385/462 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Non-Strategic Growth:**<br><br>The Parish Council supports the proposal to make provision for small-scale development in South Gloucestershire's non-urban settlements where this can be done without significant harm to their character and amenities, and without damage to, or loss of valuable built, historic or natural assets. It supports use of Sustainability Assessments to identify those settlements which will be included. However, given the danger of "paper" exercises, it regards it as essential for South Gloucestershire to engage directly with residents and their representatives before allocating sites and numbers of homes to particular places. Wherever possible, individual sites should only be allocated (through the Local Plan) with the agreement of local people. As the Parish Council has made clear above, it is strongly of the view that the design and form of any new developments in non-urban settlements should enhance the local character and be in sympathy with the local vernacular architecture.<br><br>The Council notes that the Prospectus Document states that "(e)merging Government guidance is for 10% of the Plan's total to be on sites of 0.5ha, or less" whereas it defines "non-strategic development" as development on sites between 0.5ha and 25ha (10 to 500 homes). It is not clear whether it is South Gloucestershire's intention to allocate sites smaller than 0.5ha through its new Local Plan, but if not, and if it aims to comply with "(e)merging Government guidance" as set out above, there appears to be a risk of undercounting provision. At one of the South Gloucestershire Briefing Meetings for Parish Councillors, Planning Officers advised that the Council assumes in its calculations that 5% of supply will come from "windfall" sites (i.e. non Plan-led development: usually small and often infill). If Government guidance determines that this should be 10%, instead, South Gloucestershire should either include sites smaller than 0.5ha in its new Local Plan and count them towards the 1,300 dwelling target for non-strategic development, or adjust the numbers elsewhere to avoid over provision through under counting.<br><br>Iron Acton Parish Council supports Option 3 - the inclusion of rural places both inside and outside the Green Belt amongst those identified for non-strategic development. The Parish Council supports the requirement in the National Planning Policy Framework for any development in the Green Belt to be subject to an exceptional circumstances test. However, it also recognises that where settlements are embedded in Green Belt land this can inhibit even positive development, potentially stifling the community and reducing the sustainability of the settlement. It recognises, too, that requiring the building of 1,300 homes in only 12 small rural settlements (Option 1) would be likely to overwhelm them and destroy their character. It does not support Option 2 (development confined to rural places inside the Green Belt). Given the very strong Policy presumption against development in the Green Belt, and its sensitivity with local communities, the Parish Council considers that the sustainability or otherwise of individual settlements for development, and the scale of development, should be determined in conjunction with local residents and their representatives. Adoption of Option 3 should not itself be regarded as sufficient to constitute "exceptional circumstances," and the test should still be applied to individual Green Belt sites before inclusion in the new Local Plan. |

| | |
|---|---|
| | Finally, South Gloucestershire should have regard, in deciding on proposals for individual settlements, to their recent history of development and to the likely impact of other elements of its new Local Plan on them. So, for instance, were the North West Yate strategic development to survive as part of the final Local Plan, it would have a massive (and largely negative) impact on Engine Common and Iron Acton Village. Both are among the 35 places in Option 3, but to subject them to the double jeopardy of additional non-strategic development would be unjustifiable. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | J. Bond |
| **Comment ID** | 17779105/474 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Non-strategic growth:<br><br>Option 1 outside the Green Belt best.<br><br>But note that, for example all 3 Options list 2,537 homes for Frampton Cotterell, 167 homes for Rangeworthy; and that Options 2 & 3 both list 183 extra homes for Iron Acton in addition to the excessive and inappropriate strategic "Yate" development of 2,000 homes for Iron Acton. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christine Hunter |
| **Comment ID** | 19809025/488 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Non-Strategic Growth:**<br><br>I agree with the proposal to make provision for small-scale development in South Gloucestershire's villages where this can be done without significant harm to their character and amenities, and without damage to, or loss of valuable built, historic or natural assets. South Gloucestershire should engage directly with residents and their Representatives before allocating sites and numbers of homes to particular places. Wherever possible, individual sites should only be allocated with the agreement of local people. The design of any new rural developments should enhance the local character and be in sympathy with the local historic architecture. The scale should be in sympathy with the size of the settlement and not overwhelm it.<br><br>The Draft Joint Spatial Plan sets the "non-strategic" (rural) requirement at 1,300 homes in South Gloucestershire. Of the three options in the Local Plan proposals for delivering this, Option 3 would spread it over all 35 sustainable rural settlements, whether or not in the Green Belt. This would be preferable to limiting it to the 12 rural settlements with non-Green Belt status as they would be overwhelmed and their character destroyed. I do not support Option 2 (development confined to rural places inside the Green Belt). Given the very strong Policy presumption against development in the Green Belt, and its sensitivity locally, sites should be chosen in conjunction with local residents and their Representatives. Where they would be in the Green Belt the "exceptional circumstances" test should still be applied.<br><br>There should be no "double jeopardy." Should the North West Yate strategic development become part of the new Local Plan it would have a massive and negative impact on Engine Common and Iron Acton Village. In these circumstances they should not be subject to further non-strategic developments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alan Jones - Hanham District Green Belt Conservation Society |
| **Comment ID** | 17236353/503 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | 3.2 Selection of One Option for Non-strategic Growth:<br><br>The provision of 'Affordable' Homes in semi-urban and rural locations relies on the need for Public Transport, as stated above, without adequate provision, these areas will be isolated from work opportunities, recreational provision and basic shopping needs. No description of the envisaged expansion of existing Transport Networks, nor provision of employment land close to these areas, are contained in the Document.<br><br>Building in the Green Belt does not result in an increase in Affordable Homes. When protected countryside is released to developers, it's not low-cost housing they build but executive properties for the most wealthy.<br><br>We do not need to 'trade-off' housing and the Green Belt - both are vital to our communities and our wellbeing. Misguided calls to build on the Green Belt results in millions of people losing valuable access to green space, without tackling the housing shortage!!<br><br>Option 1 (Outside Green Belt): |

| | |
|---|---|
| | The responsibility to scrutinise available development sites in all areas must rest with South Gloucestershire Council.<br><br>This is particularly so within Urban areas. As can be seen from the locations registered on 'Call for Sites,' the 'easy' options of developing Greenfield areas are those that are put forward by owners and developers.<br><br>A 'lame' Call for Sites from developers will not 'tease-out' the more complex development sites within urban areas, this has to be driven proactively by SGC.<br><br>Developing 'brownfield' sites or upgrading existing buildings are more technically challenging and often not as profitable. However, their location within urban areas, close to shopping, services and transport links, is ideal for the younger purchasers/renters in today's market.<br><br>Option 2 (Inside Green Belt):<br><br>The Local Plan makes its own case for not building in the Green Belt - Appendix 3 Green Belt and AONB - So why is it being contemplated??<br><br>It can only be a short-term solution to dismiss the criteria that has so far protected the Green Belt areas. The benefit of these areas for recreational activities have been known for sometime, but increasingly in a busy pressurised world, the advantages gained in 'mindfulness' from the casual view of open countryside, walking or driving through these areas is being advocated in countering Depression, and other mental problems.<br><br>Once destroyed, these areas will be gone forever.<br><br>Option 3 (Both). |
| **Attached documents** | Hanham District Green Belt Conservation Society (Alan Jones).pdf (20.3 MB) |

| | |
|---|---|
| **Respondent Name** | Roy Crew |
| **Comment ID** | 3973121/531 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | My Responses to the specific Local Plan Questions:<br><br>Question 3:<br><br>Growth should be outside the Green Belt near or in easy reach of employment. There should be cheap pollution free transport provided. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Paul Chapman - Iron Acton Parish Council |
| **Comment ID** | 19809537/554 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Non-Strategic Growth:**<br><br>I agree with the proposal to make provision for small-scale development in South Gloucestershire's villages where this can be done without significant harm to their character and amenities, and without damage to, or loss of valuable built, historic or natural assets. South Gloucestershire should engage directly with residents and their Representatives before allocating sites and numbers of homes to particular places. Wherever possible, individual sites should only be allocated with the agreement of local people. The design of any new rural developments should enhance the local character and be in sympathy with the local historic architecture. The scale should be in sympathy with the size of the settlement and not overwhelm it.<br><br>The Draft Joint Spatial Plan sets the "non-strategic" (rural) requirement at 1,300 homes in South Gloucestershire. Of the three options in the Local Plan proposals for delivering this, Option 3 would spread it over all 35 sustainable rural settlements, whether or not in the Green Belt. This would be preferable to limiting it to the 12 rural settlements with non Green Belt status as they would be overwhelmed and their character destroyed. I do not support Option 2 (development confined to rural places inside the Green Belt). Given the very strong Policy presumption against development in the Green Belt, and its sensitivity locally, sites should be chosen in conjunction with local residents and their Representatives. Where they would be in the Green Belt the "exceptional circumstances" test should still be applied.<br><br>There should be no "double jeopardy". Should the North West Yate strategic development become part of the new Local Plan it would have a massive and negative impact on Engine Common and Iron Acton Village. In these circumstances they should not be subject to further non-strategic developments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David Hatherell |
| **Comment ID** | 19830849/569 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Non-Strategic Growth:**<br><br>I agree with the proposal to make provision for small-scale development in South Gloucestershire's villages where this can be done without significant harm to their character and amenities, and without damage to, or loss of valuable built, historic or natural assets. South Gloucestershire should engage directly with residents and their Representatives before allocating sites and numbers of homes to particular places. Wherever possible, individual sites should only be allocated with the agreement of local people. The design of any new rural developments should enhance the local character and be in sympathy with the local historic architecture. The scale should be in sympathy with the size of the settlement and not overwhelm it.<br><br>The Draft Joint Spatial Plan sets the "non-strategic" (rural) requirement at 1,300 homes in South Gloucestershire. Of the three options in the Local Plan proposals for delivering this, Option 3 would spread it over all 35 sustainable rural settlements, whether or not in the Green Belt. This would be preferable to limiting it to the 12 rural settlements with non-Green Belt status as they would be overwhelmed and their character destroyed. I do not support Option 2 (development confined to rural places inside the Green Belt). Given the very strong Policy presumption against development in the Green Belt, and its sensitivity locally, sites should be chosen in conjunction with local residents and their Representatives. Where they would be in the Green Belt the "exceptional circumstances" test should still be applied.<br><br>There should be no "double jeopardy." Should the North West Yate strategic development become part of the new Local Plan it would have a massive and negative impact on Engine Common and Iron Acton Village. In these circumstances they should not be subject to further non-strategic developments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | John O'Donnell |
| **Comment ID** | 18604385/580 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Non-Strategic Growth:**<br><br>I agree with the proposal to make provision for small-scale development in South Gloucestershire's villages where this can be done without significant harm to their character and amenities, and without damage to, or loss of valuable built, historic or natural assets. South Gloucestershire should engage directly with residents and their Representatives before allocating sites and numbers of homes to particular places. Wherever possible, individual sites should only be allocated with the agreement of local people. The design of any new rural developments should enhance the local character and be in sympathy with the local historic architecture. The scale should be in sympathy with the size of the settlement and not overwhelm it.<br><br>The Draft Joint Spatial Plan sets the "non-strategic" (rural) requirement at 1,300 homes in South Gloucestershire. Of the three options in the Local Plan proposals for delivering this, Option 3 would spread it over all 35 sustainable rural settlements, whether or not in the Green Belt. This would be preferable to limiting it to the 12 rural settlements with non-Green Belt status as they would be overwhelmed and their character destroyed. I do not support Option 2 (development confined to rural places inside the Green Belt). Given the very strong Policy presumption against development in the Green Belt, and its sensitivity locally, sites should be chosen in conjunction with local residents and their Representatives. Where they would be in the Green Belt the "exceptional circumstances" test should still be applied.<br><br>There should be no "double jeopardy." Should the North West Yate strategic development become part of the new Local Plan it would have a massive and negative impact on Engine Common and Iron Acton Village. In these circumstances they should not be subject to further non-strategic developments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Joseph Hatherell |
| **Comment ID** | 19831681/591 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Non-Strategic Growth:**<br><br>I agree with the proposal to make provision for small-scale development in South Gloucestershire's villages where this can be done without significant harm to their character and amenities, and without damage to, or loss of valuable built, historic or natural assets. South Gloucestershire should engage directly with residents and their Representatives before allocating sites and numbers of homes to particular places. Wherever possible, individual sites should only be allocated with the agreement of local people. The design of any new rural developments should enhance the local character and be in sympathy with the local historic architecture. The scale should be in sympathy with the size of the settlement and not overwhelm it.<br><br>The Draft Joint Spatial Plan sets the "non-strategic" (rural) requirement at 1,300 homes in South Gloucestershire. Of the three options in the Local Plan proposals for delivering this, Option 3 would spread it over all 35 sustainable rural settlements, whether or not in the Green Belt. This would be preferable to limiting it to the 12 rural settlements with non-Green Belt status as they would be overwhelmed and their character destroyed. I do not support Option 2 (development confined to rural places inside the Green Belt). Given the very strong Policy presumption against development in the Green Belt, and its sensitivity locally, sites should be chosen in conjunction with local residents and their Representatives. Where they would be in the Green Belt the "exceptional circumstances" test should still be applied. |

| | |
|---|---|
| | There should be no “double jeopardy.” Should the North West Yate strategic development become part of the new Local Plan it would have a massive and negative impact on Engine Common and Iron Acton Village. In these circumstances they should not be subject to further non-strategic developments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Daphne Dunning - Cromhall Parish Council |
| **Comment ID** | 16475073/604 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | 3.2<br><br>More generally the Council thinks that Brownfield sites and appropriate lower grade Green Belt land that is not of current benefit to an existing community should be considered - IF there is a genuine need for this level of development. Lower quality Green Belt land should be considered only if the need can be justified within strict parameters and it is a better fit for infrastructure etc. Blindly sticking a development where it cannot serve the community to an acceptable standard is both wrong and irresponsible and targeting the Green Belt just because it’s there is not an acceptable option. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christine Eden - Marshfield Community Land Trust |
| **Comment ID** | 14404353/619 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Q 3.2 Options for Non-strategic Growth:**<br><br>MCLT recognises the need for small scale growth in rural communities to sustain economic and social viability. But we support Option 1 which argues for investigating sites for non-strategic growth outside the Green Belt. Rather we wish to argue that there is an alternative option not identified in the Draft Local Plan: small scale housing growth on rural exception sites developed by community-led CLTs, responding to local housing needs. Such initiatives are being developed by Community Land Trusts across the South West and make a contribution to Councils’ non-strategic growth targets as could be the case with Marshfield.<br><br>Marshfield's 2013 Housing Needs Survey, and MCLT's subsequent research, lead us to believe that, after years of expensive market led housing, what Marshfield and other rural communities require is small scale Affordable Housing growth for those with local connections. In Marshfield this need will not be met by a market–led allocation but can occur through its not-for-profit CLT developing rural exception sites to meet local need and ensuring such housing is held in perpetuity for the local community.<br><br>This model supports sustainable growth for rural communities and ensures their long term vitality and vibrancy. Such housing enables people with family and/or employment links to remain in their communities rather than be excluded by not being able to afford to buy a house locally or secure rented accommodation under the SGC HomeChoice scheme. If this type of initiative were recognised in the Local Plan it would be possible for no allocation to be made within the Green Belt in places where a CLT exists. But CLT developments on rural exception sites could make a useful contribution to SGC's non- strategic housing target.<br><br>Councils across the South West have a range of Policies that support CLTs including recognising the CLT contribution to housing growth[1] . Some Councils include exception sites within their housing supply which is what MCLT are suggesting SGC might consider. A community-led approach encourages rural communities to promote rather than oppose housing schemes because they are brought forward with support from the community rather than being imposed on them through Local Plan allocations or speculation by developers.<br><br>West Dorset provides a good example: 11 CLTs have provided over homes, most of which are rural - and the CLTs will carry on looking for projects into the future as further needs arise, as we intend to do in Marshfield. In South Gloucestershire there is even greater scope for community led housing on exception sites because, unlike West Dorset, SGC adheres to the NPPF and the existing SGC exception site Policy which permit a minority of open market homes. Mixed tenure sites reflect the existing housing stock within villages and also help to promote diversity and choice in the local housing market.<br><br>Our experience is that SGC is supportive of CLTs but as yet this is not explicit in their Polices. Recognising a CLT contribution to housing growth on rural exception sites could help promote such initiatives and would support community-led rather than market-led housing growth.<br><br>**MCLT suggests therefore that there needs to be an explicit recognition that an element of the SGC non-strategic housing target can be met by CLTs promoting small scale ‘balanced incremental development’ of Affordable Housing for local people on rural exception sites.**<br><br>In summary:<br><br>MCLT propose that SGC’s Planning Policies are amended to explicitly include non-strategic growth through CLTs on exception sites as one option for contributing to its housing targets. |

| | |
|---|---|
| | This has the following benefits:<br><br>1. New housing growth from exception sites would be identified as contributing to the achievement of the SGC target<br>2. Allowing small community-led developments on rural exception sites would protect Green Belt from market allocations and avoid the associated community resistance.<br>3. The removal of Green Belt sites as potential market housing sites would greatly support CLTs in their search for exception sites by reducing 'hope value' on land around village settlements.<br>4. Exception sites address issues of rural social and economic sustainability by giving priority to local people<br>5. Addressing local need helps reduce the impact of new housing on traffic movement and density. Communities such as Marshfield have very limited Public Transport and living close to work and family limits the increase in traffic whereas that associated with new market developments will be considerable<br>6. A minority element of market housing within a CLT development ensures diversity of tenure and choice as was typical of rural communities before 'Right to Buy' and the gentrification of rural communities.<br><br>[1] https://www.dorsetforyou.gov.uk/media/209581/West-Dorset-Weymouth--Portland-Local-Plan-2015/pdf/West_Dorset__Weymouth___Portland_Local_Plan_2015.pdf |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Jane Driver |
| **Comment ID** | 5134785/624 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Non-Strategic Growth:**<br><br>I agree with the proposal to make provision for small-scale development in South Gloucestershire's villages where this can be done without significant harm to their character and amenities, and without damage to, or loss of valuable built, historic or natural assets. South Gloucestershire should engage directly with residents and their Representatives before allocating sites and numbers of homes to particular places. Wherever possible, individual sites should only be allocated with the agreement of local people. The design of any new rural developments should enhance the local character and be in sympathy with the local historic architecture. The scale should be in sympathy with the size of the settlement and not overwhelm it.<br><br>The Draft Joint Spatial Plan sets the "non-strategic" (rural) requirement at 1,300 homes in South Gloucestershire. Of the three options in the Local Plan proposals for delivering this, Option 3 would spread it over all 35 sustainable rural settlements, whether or not in the Green Belt. This would be preferable to limiting it to the 12 rural settlements with non-Green Belt status as they would be overwhelmed and their character destroyed. I do not support Option 2 (development confined to rural places inside the Green Belt). Given the very strong Policy presumption against development in the Green Belt, and its sensitivity locally, sites should be chosen in conjunction with local residents and their Representatives. Where they would be in the Green Belt the "exceptional circumstances" test should still be applied.<br><br>There should be no "double jeopardy." Should the North West Yate strategic development become part of the new Local Plan it would have a massive and negative impact on Engine Common and Iron Acton Village. In these circumstances they should not be subject to further non-strategic developments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Diana Porter-Smith |
| **Comment ID** | 10874433/635 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Non-Strategic Growth:**<br><br>I agree with the proposal to make provision for small-scale development in South Gloucestershire's villages where this can be done without significant harm to their character and amenities, and without damage to, or loss of valuable built, historic or natural assets. South Gloucestershire should engage directly with residents and their Representatives before allocating sites and numbers of homes to particular places. Wherever possible, individual sites should only be allocated with the agreement of local people. The design of any new rural developments should enhance the local character and be in sympathy with the local historic architecture. The scale should be in sympathy with the size of the settlement and not overwhelm it.<br><br>The Draft Joint Spatial Plan sets the "non-strategic" (rural) requirement at 1,300 homes in South Gloucestershire. Of the three options in the Local Plan proposals for delivering this, Option 3 would spread it over all 35 sustainable rural settlements, whether or not in the Green Belt. This would be preferable to limiting it to the 12 rural settlements with non-Green Belt status as they would be overwhelmed and their character destroyed. I do not support Option 2 (development confined to rural places inside the Green Belt). Given the very strong Policy presumption against development in the Green Belt, and its sensitivity locally, sites should be chosen in conjunction with local residents and their Representatives. Where they would be in the Green Belt the "exceptional circumstances" test should still be applied.<br><br>There should be no "double jeopardy." Should the North West Yate strategic development become part of the new Local Plan it would have a massive and negative impact on Engine Common and Iron Acton Village. In these circumstances they should not be subject to further non-strategic developments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Michael Keenan |
| **Comment ID** | 2796353/647 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Non-Strategic Growth:**<br><br>I agree with the proposal to make provision for small-scale development in South Gloucestershire's villages where this can be done without significant harm to their character and amenities, and without damage to, or loss of valuable built, historic or natural assets. South Gloucestershire should engage directly with residents and their Representatives before allocating sites and numbers of homes to particular places. Wherever possible, individual sites should only be allocated with the agreement of local people. The design of any new rural developments should enhance the local character and be in sympathy with the local historic architecture. The scale should be in sympathy with the size of the settlement and not overwhelm it.<br><br>The Draft Joint Spatial Plan sets the "non-strategic" (rural) requirement at 1,300 homes in South Gloucestershire. Of the three options in the Local Plan proposals for delivering this, Option 3 would spread it over all 35 sustainable rural settlements, whether or not in the Green Belt. This would be preferable to limiting it to the 12 rural settlements with non-Green Belt status as they would be overwhelmed and their character destroyed. I do not support Option 2 (development confined to rural places inside the Green Belt). Given the very strong Policy presumption against development in the Green Belt, and its sensitivity locally, sites should be chosen in conjunction with local residents and their Representatives. Where they would be in the Green Belt the "exceptional circumstances" test should still be applied.<br><br>There should be no "double jeopardy." Should the North West Yate strategic development become part of the new Local Plan it would have a massive and negative impact on Engine Common and Iron Acton Village. In these circumstances they should not be subject to further non-strategic developments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Welbeck Strategic Land LLP |
| **Comment ID** | 19840833/657 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | C. RESPONSE TO THE QUESTIONS<br><br>15. In the interest of brevity and succinctness, this Section only responds to the Questions of relevance to the current proposals for Cleve Park.<br><br>Question 3.2 - Non-Strategic Growth Options<br><br>16. We support Option 1 for Non-strategic Growth - development outside the Green Belt. We consider that suitable sites that are outside the Green Belt should be developed before Green Belt land is released in order to safeguard the existing extent of the Green Belt in South Gloucestershire.<br><br>17. Thornbury is not a rural area as set out in the new SGLP and the focus of this Question. The town has been designated as a Strategic Development Location in the Draft JSP. However, we still consider that because Thornbury is bound by Green Belt to the South and West of the town, sites that are not restricted by this designation should be brought forward for residential development first. 1<br><br>8. The site at Cleve Park is not constrained by Green Belt, or any national designations (foot note 9 of the National Planning Policy Framework). The site is in a suitable and sustainable location for residential development of up to 350 residential units. |
| **Attached documents** | lbeck Strategic Land LLP - Dominic Lawson Bespoke Planning (Harriet Swale).pdf (1.4 MB) |

| | |
|---|---|
| **Respondent Name** | Richard Hunter |
| **Comment ID** | 12513441/662 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Non-Strategic Growth:**<br><br>I agree with the proposal to make provision for small-scale development in South Gloucestershire's villages where this can be done without significant harm to their character and amenities, and without damage to, or loss of valuable built, historic or natural assets. South Gloucestershire should engage directly with residents and their Representatives before allocating sites and numbers of homes to particular places. Wherever possible, individual sites should only be allocated with the agreement of local people. The design of any new rural developments should enhance the local character and be in sympathy with the local historic architecture. The scale should be in sympathy with the size of the settlement and not overwhelm it.<br><br>The Draft Joint Spatial Plan sets the "non-strategic" (rural) requirement at 1,300 homes in South Gloucestershire. Of the three options in the Local Plan proposals for delivering this, Option 3 would spread it over all 35 sustainable rural settlements, whether or not in the Green Belt. This would be preferable to limiting it to the 12 rural settlements with non-Green Belt status as they would be overwhelmed and their character destroyed. I do not support Option 2 (development confined to rural places inside the Green Belt). Given the very strong Policy presumption against development |

| | |
|---|---|
| | in the Green Belt, and its sensitivity locally, sites should be chosen in conjunction with local residents and their Representatives. Where they would be in the Green Belt the “exceptional circumstances” test should still be applied.<br><br>There should be no “double jeopardy.” Should the North West Yate strategic development become part of the new Local Plan it would have a massive and negative impact on Engine Common and Iron Acton Village. In these circumstances they should not be subject to further non-strategic developments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Zoe Hancock - Bristol Avon Catchment Partnership |
| **Comment ID** | 19832225/676 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | No additional Comments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Rosemary White |
| **Comment ID** | 10707009/696 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Non-strategic Growth:<br><br>I agree with the proposal to make provision for small-scale development in South Gloucestershire's villages where this can be done without significant harm to their character and amenities, and without damage to, or loss of valuable built, historic or natural assets. South Gloucestershire should engage directly with residents and their Representatives before allocating sites and numbers of homes to particular places. Wherever possible, individual sites should only be allocated with the agreement of local people. The design of any new rural developments should enhance the local character and be in sympathy with the local historic architecture. The scale should be in sympathy with the size of the settlement and not overwhelm it.<br><br>The Draft Joint Spatial Plan sets the "non-strategic" (rural) requirement at 1,300 homes in South Gloucestershire. Of the three options in the Local Plan proposals for delivering this, Option 3 would spread it over all 35 sustainable rural settlements, whether or not in the Green Belt. This would be preferable to limiting it to the 12 rural settlements with non-Green Belt status as they would be overwhelmed and their character destroyed. I do not support Option 2 (development confined to rural places inside the Green Belt). Given the very strong Policy presumption against development in the Green Belt, and its sensitivity locally, sites should be chosen in conjunction with local residents and their Representatives. Where they would be in the Green Belt the "exceptional circumstances" test should still be applied.<br><br>There should be no "double jeopardy." Should the North West Yate Strategic Development become part of the new Local Plan it would have a massive and negative impact on Engine Common and Iron Acton Village. In these circumstances they should not be subject to further non-strategic developments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Purchase |
| **Comment ID** | 2804385/707 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Non-Strategic Growth:**<br><br>I agree with the proposal to make provision for small-scale development in South Gloucestershire’s villages where this can be done without significant harm to their character and amenities, and without damage to, or loss of valuable built, historic or natural assets. South Gloucestershire should engage directly with residents and their Representatives before allocating sites and numbers of homes to particular places. Wherever possible, individual sites should only be allocated with the agreement of local people. The design of any new rural developments should enhance the local character and be in sympathy with the local historic architecture. The scale should be in sympathy with the size of the settlement and not overwhelm it.<br><br>The Draft Joint Spatial Plan sets the “non-strategic” (rural) requirement at 1,300 homes in South Gloucestershire. Of the three options in the Local Plan proposals for delivering this, Option 3 would spread it over all 35 sustainable rural settlements, whether or not in the Green Belt. This would be preferable to limiting it to the 12 rural settlements with non-Green Belt status as they would be overwhelmed and their character destroyed. I do not support Option 2 (development confined to rural places inside the Green Belt). Given the very strong Policy presumption against development in the Green Belt, and its sensitivity locally, sites should be chosen in conjunction with local residents and their Representatives. Where they would be in the Green Belt the “exceptional circumstances” test should still be applied.<br><br>There should be no “double jeopardy.” Should the North West Yate strategic development become part of the new Local Plan it would have a massive and negative impact on Engine Common and Iron Acton Village. In these circumstances they should not be subject to further non-strategic developments. |

| | |
|---|---|
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mark Williams |
| **Comment ID** | 19729473/720 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 3 is supported as it provides the widest opportunity for the delivery of development in sustainable locations.<br><br>Green Belt should not be a primary consideration in the distribution of development. Instead, all development locations should be identified based on the needs of local communities and the distribution of development to sustainable locations. Therefore, Option 3 is clearly the appropriate approach for the Council to adopt. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Chelverton Developments Ltd |
| **Comment ID** | 16478625/733 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | (3.2) Chelverton note the three suggested search options for accommodating non-strategic growth, which is essentially a question as to whether or not locations/sites within the Green Belt should be considered. Having regard to the above Comments, Chelverton consider that it is appropriate at this stage to investigate opportunities both inside and outside the Green Belt (Option 3). However, in accordance with well-established National Planning Guidance, it will be important for the Council to show that it has fully examined all non-Green Belt options for meeting the identified housing requirement if it is to demonstrate circumstances for justifying Green Belt release. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | James Carpenter - Falfield Parish Council |
| **Comment ID** | 16617825/740 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Option 1** is not an acceptable option as opting to put all the housing outside the Green Belt places a great load on just 12 villages (like Falfield) that do not have Green Belt designation. Many of these villages identified for assessment are small, lack walking and cycling access to most key services and facilities and are poorly connected to Public Transport compared to the larger villages within the Green Belt. It is not a practical option, number wise without potentially ruining the character of these small villages, 7 of which have less than 180 houses. The area outside the Green Belt is already being promoted to take large amounts of the SDL housing allocations and it is unfair to allocate more housing here.<br><br>**Option 2** is an interesting option as it can allocate housing in 28 villages which are larger, closer to the urban edge, have better walking and cycling access to most key services and facilities and are better connected to Public Transport. Some of these places have been constrained by their Green Belt designation over the years and may welcome the opportunity for some expansion. It would create less harm to smaller villages as housing load can be shared by more villages.<br><br>**Option 3** is the fairer option as it offers the widest choice of 35 sites, therefore a lower potential increase in settlement sizes and harm to the character of all the rural villages. Parishes to the North of the County are already being promoted to take large amounts of the Strategic Housing Allocations and it is unfair to allocate more housing there. |
| **Attached documents** | Falfield Parish Council (Mr. James Carpenter).pdf (1.9 MB) |

| | |
|---|---|
| **Respondent Name** | Suzanna Keenan |
| **Comment ID** | 17805057/750 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Non-Strategic Growth:**<br><br>I agree with the proposal to make provision for small-scale development in South Gloucestershire's villages where this can be done without significant harm to their character and amenities, and without damage to, or loss of valuable built, historic or natural assets. South Gloucestershire should engage directly with residents and their Representatives before allocating sites and numbers of homes to particular places. Wherever possible, individual sites should only be allocated with the agreement of local people. The design of any new rural developments should enhance the local character and be in sympathy with the local historic architecture. The scale should be in sympathy with the size of the settlement and not overwhelm it.<br><br>The Draft Joint Spatial Plan sets the "non-strategic" (rural) requirement at 1,300 homes in South Gloucestershire. Of the three options in the Local Plan proposals for delivering this, Option 3 would spread it over all 35 sustainable rural settlements, whether or not in the Green Belt. This would be preferable to limiting it to the 12 rural settlements with non-Green Belt status as they would be overwhelmed and their character destroyed. I do not support Option 2 (development confined to rural places inside the Green Belt). Given the very strong Policy presumption against development in the Green Belt, and its sensitivity locally, sites should be chosen in conjunction with local residents and their Representatives. Where they would be in the Green Belt the "exceptional circumstances" test should still be applied. |

| | |
|---|---|
| | There should be no “double jeopardy.” Should the North West Yate strategic development become part of the new Local Plan it would have a massive and negative impact on Engine Common and Iron Acton Village. In these circumstances they should not be subject to further non-strategic developments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Simon Whittard |
| **Comment ID** | 12489153/762 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Non-Strategic Growth:**<br><br>I agree with the proposal to make provision for small-scale development in South Gloucestershire’s villages where this can be done without significant harm to their character and amenities, and without damage to, or loss of valuable built, historic or natural assets. South Gloucestershire should engage directly with residents and their Representatives before allocating sites and numbers of homes to particular places. Wherever possible, individual sites should only be allocated with the agreement of local people. The design of any new rural developments should enhance the local character and be in sympathy with the local historic architecture. The scale should be in sympathy with the size of the settlement and not overwhelm it.<br><br>The Draft Joint Spatial Plan sets the “non-strategic” (rural) requirement at 1,300 homes in South Gloucestershire. Of the three options in the Local Plan proposals for delivering this, Option 3 would spread it over all 35 sustainable rural settlements, whether or not in the Green Belt. This would be preferable to limiting it to the 12 rural settlements with non-Green Belt status as they would be overwhelmed and their character destroyed. I do not support Option 2 (development confined to rural places inside the Green Belt). Given the very strong Policy presumption against development in the Green Belt, and its sensitivity locally, sites should be chosen in conjunction with local residents and their Representatives. Where they would be in the Green Belt the “exceptional circumstances” test should still be applied.<br><br>There should be no “double jeopardy.” Should the North West Yate strategic development become part of the new Local Plan it would have a massive and negative impact on Engine Common and Iron Acton Village. In these circumstances they should not be subject to further non-strategic developments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sovereign Housing Association |
| **Comment ID** | 16477825/775 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | We support Option 3, which provides the widest opportunity for the delivery of development in sustainable locations.<br><br>Green Belt should not be a primary consideration in the distribution of development. Instead, all development locations should be identified based on the needs of local communities and the distribution of development to sustainable locations. Therefore, Option 3 is clearly the appropriate approach for the Council to adopt. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Harrow Estates Plc and Robert Hitchins Ltd |
| **Comment ID** | 19898721/782 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | See attached. |
| **Attached documents** | Harrow Estates Plc and Robert Hitchins Ltd - Barton Willmore (Robyn Nicholl).pdf (6.3 MB) |

| | |
|---|---|
| **Respondent Name** | Heather Elgar - West of England Nature Partnership |
| **Comment ID** | 19839553/788 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Please find below Comments from the West of England Nature Partnership (WENP) in response to the South Gloucestershire Local Plan Consultation.<br><br>For transparency, please know that Dominic Mellon (Consultant in Public Health for South Gloucestershire Council) sits on the WENP Board and thus note a declared conflict of interests. This Response reflects the aims and objectives of the Partnership and does not reflect views of individual Board members.<br><br>Question 3: Non-strategic Growth: |

| | |
|---|---|
| | iii. Option 3 (Both Inside & Outside the Green Belt). |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Robert and Diana Pardoe |
| **Comment ID** | 10784545/809 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Non-Strategic Growth:**<br><br>I agree with the proposal to make provision for small-scale development in South Gloucestershire's villages where this can be done without significant harm to their character and amenities, and without damage to, or loss of valuable built, historic or natural assets. South Gloucestershire should engage directly with residents and their Representatives before allocating sites and numbers of homes to particular places. Wherever possible, individual sites should only be allocated with the agreement of local people. The design of any new rural developments should enhance the local character and be in sympathy with the local historic architecture. The scale should be in sympathy with the size of the settlement and not overwhelm it.<br><br>The Draft Joint Spatial Plan sets the "non-strategic" (rural) requirement at 1,300 homes in South Gloucestershire. Of the three options in the Local Plan proposals for delivering this, Option 3 would spread it over all 35 sustainable rural settlements, whether or not in the Green Belt. This would be preferable to limiting it to the 12 rural settlements with non-Green Belt status as they would be overwhelmed and their character destroyed. I do not support Option 2 (development confined to rural places inside the Green Belt). Given the very strong Policy presumption against development in the Green Belt, and its sensitivity locally, sites should be chosen in conjunction with local residents and their Representatives. Where they would be in the Green Belt the "exceptional circumstances" test should still be applied.<br><br>There should be no "double jeopardy." Should the North West Yate strategic development become part of the new Local Plan it would have a massive and negative impact on Engine Common and Iron Acton Village. In these circumstances they should not be subject to further non-strategic developments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | SPM Homes Ltd |
| **Comment ID** | 19732097/820 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Qu 3.2:<br><br>Part 2: Non-Strategic Development in the rest of South Gloucestershire:<br><br>Rural Growth – Locations for Investigation - **OBJECT**<br><br>Option 1 – Outside Green Belt – Objection as this will not deliver housing and jobs in a sustainable location. It will increase the dependency on the private motor car and increase pollution. The non Green Belt locations proposed are comparatively close to the Strategic Allocations proposed elsewhere in the Plan and thus developing upon non Green Belt villages would not achieve appropriate development across the Plan area.<br><br>Option 2 Inside the Green Belt -- **SUPPORT**. The inclusion of Almondsbury as a location for non-strategic growth is supported. Almondsbury is located close to facilities and services and scores positively when measured against the three pillars defining sustainable development.<br><br>The village:<br><br>Lies close to major transport nodes, it has a range of services within the village, and it can sustain a proportionate level of growth.<br><br>Option 3 - Rural Places Both Inside and Outside the Green Belt – **OBJECT**<br><br>Whilst there may be some options for considering sites both within and without the GB. It is apparent that the majority of outside Green Belt sites will not create a sustainable pattern of development. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Brian Hackland |
| **Comment ID** | 8354337/826 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Non-Strategic Growth:**<br><br>South Gloucestershire has floated three options for locating 1,300 new homes in non-strategic developments spread across its area. If this number is confirmed in the final Joint Spatial Plan, I agree that such small-scale development in South Gloucestershire's villages should be made where this can be done without significant harm to their character and amenities, and without damage to, or loss of valuable built, historic or natural |

| | |
|---|---|
| | assets. South Gloucestershire should engage directly with residents and their Representatives before allocating sites and numbers of homes to particular places. Wherever possible, individual sites should only be allocated with the agreement of local people. The design of any new rural developments should enhance the local character and fit aesthetically with the local historic architecture. The scale should be in sympathy with the size of the settlement and not overwhelm it.<br><br>The Draft Joint Spatial Plan sets the "non-strategic" (rural) requirement at 1,300 homes in South Gloucestershire. Of the three options in the Local Plan proposals for delivering this, Option 3 would spread it over all 35 rural settlements judged to be sustainable, whether or not in the Green Belt. This would be preferable to limiting it to the 12 rural settlements with non-Green Belt status as they would be overwhelmed and their character destroyed. I do not support Option 2 (development confined to rural places inside the Green Belt). Given the very strong Policy presumption against development in the Green Belt, and its sensitivity locally, sites should be chosen in conjunction with local residents and their Representatives. Where they would be in the Green Belt the "exceptional circumstances" test should still be applied.<br><br>There should be no "double jeopardy." Should the North West Yate strategic development become part of the new Local Plan it would have a massive and negative impact on Engine Common and Iron Acton Village. In these circumstances they should not be subject to further non-strategic developments. This principle should apply to all the 35 settlements listed. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anna Webster |
| **Comment ID** | 19843617/837 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Non-Strategic Growth:**<br><br>I agree with the proposal to make provision for small-scale development in South Gloucestershire's villages where this can be done without significant harm to their character and amenities, and without damage to, or loss of valuable built, historic or natural assets. South Gloucestershire should engage directly with residents and their Representatives before allocating sites and numbers of homes to particular places. Wherever possible, individual sites should only be allocated with the agreement of local people. The design of any new rural developments should enhance the local character and be in sympathy with the local historic architecture. The scale should be in sympathy with the size of the settlement and not overwhelm it.<br><br>The Draft Joint Spatial Plan sets the "non-strategic" (rural) requirement at 1,300 homes in South Gloucestershire. Of the three options in the Local Plan proposals for delivering this, Option 3 would spread it over all 35 sustainable rural settlements, whether or not in the Green Belt. This would be preferable to limiting it to the 12 rural settlements with non-Green Belt status as they would be overwhelmed and their character destroyed. I do not support Option 2 (development confined to rural places inside the Green Belt). Given the very strong Policy presumption against development in the Green Belt, and its sensitivity locally, sites should be chosen in conjunction with local residents and their Representatives. Where they would be in the Green Belt the "exceptional circumstances" test should still be applied.<br><br>There should be no "double jeopardy." Should the North West Yate strategic development become part of the new Local Plan it would have a massive and negative impact on Engine Common and Iron Acton Village. In these circumstances they should not be subject to further non-strategic developments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Victoria & John Vlietstra |
| **Comment ID** | 19843937/848 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Non-Strategic Growth:**<br><br>We agree with the proposal to make provision for small-scale development in South Gloucestershire's villages where this can be done without significant harm to their character and amenities, and without damage to, or loss of valuable built, historic or natural assets. South Gloucestershire should engage directly with residents and their Representatives before allocating sites and numbers of homes to particular places. Wherever possible, individual sites should only be allocated with the agreement of local people. The design of any new rural developments should enhance the local character and be in sympathy with the local historic architecture. The scale should be in sympathy with the size of the settlement and not overwhelm it.<br><br>The Draft Joint Spatial Plan sets the "non-strategic" (rural) requirement at 1,300 homes in South Gloucestershire. Of the three options in the Local Plan proposals for delivering this, Option 3 would spread it over all 35 sustainable rural settlements, whether or not in the Green Belt. This would be preferable to limiting it to the 12 rural settlements with non-Green Belt status, as they would be overwhelmed and their character destroyed. We do not support Option 2 (development confined to rural places inside the Green Belt). Given the very strong Policy presumption against development in the Green Belt, and its sensitivity locally, sites should be chosen in conjunction with local residents and their Representatives. Where they would be in the Green Belt the "exceptional circumstances" test should still be applied.<br><br>There should be no "double jeopardy." Should the North West Yate strategic development become part of the new Local Plan it would have a massive and negative impact on Engine Common and Iron Acton Village. In these circumstances they should not be subject to further non-strategic developments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christina Fussell |
| **Comment ID** | 19843969/859 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Non-Strategic Growth:**<br><br>I agree with the proposal to make provision for small-scale development in South Gloucestershire's villages where this can be done without significant harm to their character and amenities, and without damage to, or loss of valuable built, historic or natural assets. South Gloucestershire should engage directly with residents and their Representatives before allocating sites and numbers of homes to particular places. Wherever possible, individual sites should only be allocated with the agreement of local people. The design of any new rural developments should enhance the local character and be in sympathy with the local historic architecture. The scale should be in sympathy with the size of the settlement and not overwhelm it, this being in direct conflict with the Government's preferred approach to reducing urban sprawl and having a gentle decrease of housing settlements as they approach open countryside.<br><br>The Draft Joint Spatial Plan sets the "non-strategic" (rural) requirement at 1,300 homes in South Gloucestershire. Of the three options in the Local Plan proposals for delivering this, Option 3 would spread it over all 35 sustainable rural settlements, whether or not in the Green Belt. This would be preferable to limiting it to the 12 rural settlements with non-Green Belt status as they would be overwhelmed and their character destroyed. I do not support Option 2 (development confined to rural places inside the Green Belt). Given the very strong Policy presumption against development in the Green Belt, and its sensitivity locally, sites should be chosen in conjunction with local residents and their Representatives. Where they would be in the Green Belt the "exceptional circumstances" test should still be applied in order to minimise the impact and loss of ancient trees, historic woodland and the loss of Wildlife Corridors, essential to the preservation and continuation of species.<br><br>There should be no "double jeopardy." Should the North West Yate strategic development become part of the new Local Plan it would have a massive and negative impact on Engine Common and Iron Acton Village. In these circumstances they should not be subject to further non-strategic developments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Paul Fussell |
| **Comment ID** | 19844001/870 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Non-Strategic Growth:**<br><br>I agree with the proposal to make provision for small-scale development in South Gloucestershire's villages where this can be done without significant harm to their character and amenities, and without damage to, or loss of valuable built, historic or natural assets. South Gloucestershire should engage directly with residents and their Representatives before allocating sites and numbers of homes to particular places. Wherever possible, individual sites should only be allocated with the agreement of local people. The design of any new rural developments should enhance the local character and be in sympathy with the local historic architecture. The scale should be in sympathy with the size of the settlement and not overwhelm it, this being in direct conflict with the Government's preferred approach to reducing urban sprawl and having a gentle decrease of housing settlements as they approach open countryside.<br><br>The Draft Joint Spatial Plan sets the "non-strategic" (rural) requirement at 1,300 homes in South Gloucestershire. Of the three options in the Local Plan proposals for delivering this, Option 3 would spread it over all 35 sustainable rural settlements, whether or not in the Green Belt. This would be preferable to limiting it to the 12 rural settlements with non-Green Belt status as they would be overwhelmed and their character destroyed. I do not support Option 2 (development confined to rural places inside the Green Belt). Given the very strong Policy presumption against development in the Green Belt, and its sensitivity locally, sites should be chosen in conjunction with local residents and their Representatives. Where they would be in the Green Belt the "exceptional circumstances" test should still be applied in order to minimise the impact and loss of ancient trees, historic woodland and the loss of Wildlife Corridors, essential to the preservation and continuation of species.<br><br>There should be no "double jeopardy." Should the North West Yate strategic development become part of the new Local Plan it would have a massive and negative impact on Engine Common and Iron Acton Village. In these circumstances they should not be subject to further non-strategic developments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Oliver Fussell |
| **Comment ID** | 10784449/882 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Non-Strategic Growth:**<br><br>I agree with the proposal to make provision for small-scale development in South Gloucestershire's villages where this can be done without significant harm to their character and amenities, and without damage to, or loss of valuable built, historic or natural assets. South Gloucestershire should engage directly with residents and their Representatives before allocating sites and numbers of homes to particular places. Wherever possible, individual sites should only be allocated with the agreement of local people. The design of any new rural developments should enhance the local character and be in sympathy with the local historic architecture. The scale should be in sympathy with the size of the settlement and not overwhelm it, this being in direct conflict with the Government's preferred approach to reducing urban sprawl and having a gentle decrease of housing settlements as they approach open countryside. |

| | |
|---|---|
| | The Draft Joint Spatial Plan sets the "non-strategic" (rural) requirement at 1,300 homes in South Gloucestershire. Of the three options in the Local Plan proposals for delivering this, Option 3 would spread it over all 35 sustainable rural settlements, whether or not in the Green Belt. This would be preferable to limiting it to the 12 rural settlements with non-Green Belt status as they would be overwhelmed and their character destroyed. I do not support Option 2 (development confined to rural places inside the Green Belt). Given the very strong Policy presumption against development in the Green Belt, and its sensitivity locally, sites should be chosen in conjunction with local residents and their Representatives. Where they would be in the Green Belt the "exceptional circumstances" test should still be applied in order to minimise the impact and loss of ancient trees, historic woodland and the loss of Wildlife Corridors, essential to the preservation and continuation of species.<br><br>There should be no "double jeopardy." Should the North West Yate strategic development become part of the new Local Plan it would have a massive and negative impact on Engine Common and Iron Acton Village. In these circumstances they should not be subject to further non-strategic developments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tom Barnes |
| **Comment ID** | 19844673/893 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Non-Strategic Growth:**<br><br>I agree with the proposal to make provision for small-scale development in South Gloucestershire's villages where this can be done without significant harm to their character and amenities, and without damage to, or loss of valuable built, historic or natural assets. South Gloucestershire should engage directly with residents and their Representatives before allocating sites and numbers of homes to particular places. Wherever possible, individual sites should only be allocated with the agreement of local people. The design of any new rural developments should enhance the local character and be in sympathy with the local historic architecture. The scale should be in sympathy with the size of the settlement and not overwhelm it, this being in direct conflict with the Government's preferred approach to reducing urban sprawl and having a gentle decrease of housing settlements as they approach open countryside.<br><br>The Draft Joint Spatial Plan sets the "non-strategic" (rural) requirement at 1,300 homes in South Gloucestershire. Of the three options in the Local Plan proposals for delivering this, Option 3 would spread it over all 35 sustainable rural settlements, whether or not in the Green Belt. This would be preferable to limiting it to the 12 rural settlements with non-Green Belt status as they would be overwhelmed and their character destroyed. I do not support Option 2 (development confined to rural places inside the Green Belt). Given the very strong Policy presumption against development in the Green Belt, and its sensitivity locally, sites should be chosen in conjunction with local residents and their Representatives. Where they would be in the Green Belt the "exceptional circumstances" test should still be applied in order to minimise the impact and loss of ancient trees, historic woodland and the loss of Wildlife Corridors, essential to the preservation and continuation of species.<br><br>There should be no "double jeopardy." Should the North West Yate strategic development become part of the new Local Plan it would have a massive and negative impact on Engine Common and Iron Acton Village. In these circumstances they should not be subject to further non-strategic developments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Robert Cole |
| **Comment ID** | 11480641/908 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Part 2: Non-strategic Growth Options:<br><br>In the case of Westerleigh, a small village washed over by the Green Belt, any further non-strategic development of housing needs to be small and focussed on the needs of the community to maintain some expansion rather than the needs of the developer. There are a number of places where a strip development could include 5 - 10 houses on the opposite side of the road to existing development. This provides ready access to the roads and does not extend the village.<br><br>What is not wanted is a single large development of homogenous houses designed to maximise the profit of the landowner and the developer with a housing estate more suitable for an urban area. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Howard Owen - Cleve RFC |
| **Comment ID** | 19732321/913 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | We support Option 3, which provides the widest opportunity for the delivery of development in sustainable locations and allows sustainable growth for the rural communities.<br><br>The Green Belt allocation should not be the primary consideration in the distribution of development as this could immediately discount locations which are highly sustainable and already have the services and facilities required to serve a residential development in place. Instead, all development locations should be identified based on the needs of local communities and then the distribution of development to sustainable locations in order to meet the identified needs. |

| | |
|---|---|
| | In light of the above, Option 3 is considered to be the most appropriate and sustainable method, and should be adopted by the Council to identify locations for non-strategic growth. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Peter Barker - Latteridge Road Community Group |
| **Comment ID** | 6622945/938 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Non-Strategic Growth:**<br><br>I agree with the proposal to make provision for small-scale development in South Gloucestershire's villages where this can be done without significant harm to their character and amenities, and without damage to, or loss of valuable built, historic or natural assets. South Gloucestershire should engage directly with residents and their Representatives before allocating sites and numbers of homes to particular places. Wherever possible, individual sites should only be allocated with the agreement of local people. The design of any new rural developments should enhance the local character and be in sympathy with the local historic architecture. The scale should be in sympathy with the size of the settlement and not overwhelm it.<br><br>The Draft Joint Spatial Plan sets the "non-strategic" (rural) requirement at 1,300 homes in South Gloucestershire. Of the three options in the Local Plan proposals for delivering this, Option 3 would spread it over all 35 sustainable rural settlements, whether or not in the Green Belt. This would be preferable to limiting it to the 12 rural settlements with non-Green Belt status as they would be overwhelmed and their character destroyed. I do not support Option 2 (development confined to rural places inside the Green Belt). Given the very strong Policy presumption against development in the Green Belt, and its sensitivity locally, sites should be chosen in conjunction with local residents and their Representatives. Where they would be in the Green Belt the "exceptional circumstances" test should still be applied.<br><br>There should be no "double jeopardy." Should the North West Yate strategic development become part of the new Local Plan it would have a massive and negative impact on Engine Common and Iron Acton Village. In these circumstances they should not be subject to further non-strategic developments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kate Edmonds |
| **Comment ID** | 19883393/949 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Non-Strategic Growth:**<br><br>South Gloucestershire should engage directly with residents and their Representatives before allocating sites and numbers of homes to particular places. Wherever possible, individual sites should only be allocated with the agreement of local people. The design of any new rural developments should enhance the local character and be in sympathy with the local historic architecture. The scale should be in sympathy with the size of the settlement and not overwhelm it.<br><br>The Draft Joint Spatial Plan sets the "non-strategic" (rural) requirement at 1,300 homes in South Gloucestershire. Of the three options in the Local Plan proposals for delivering this, I do not support Option 2 (development confined to rural places inside the Green Belt). Given the very strong Policy presumption against development in the Green Belt, and its sensitivity locally, sites should be chosen in conjunction with local residents and their Representatives. Where they would be in the Green Belt the "exceptional circumstances" test should still be applied.<br><br>There should be no "double jeopardy." Should the North West Yate strategic development become part of the new Local Plan it would have a massive and negative impact on Engine Common and Iron Acton Village. In these circumstances they should not be subject to further non-strategic developments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Robin Pearce - Ivywell Capital Ltd |
| **Comment ID** | 19998625/961 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | 2) The SGLP identifies that 1,300 new homes are required with a potential contingency of 500 dwellings on individual non-strategic sites. Whilst Alder King (AK) has submitted Representations to the JSP contending that the identified overall housing need figure is insufficient to meet the needs of the West of England, the general intention to provide additional housing for non-strategic growth in line with the JSP is supported. Clearly the SGLP will need to respond to any changes in the quantum and distribution of development should the JSP be subject to modification.<br><br>3) It is interesting to reflect on the fact that in the JSP there are three contingency options for accommodating any shortfall in delivery, at Clevedon, Chipping Sodbury and via the additional 500 homes in 'rural' South Gloucestershire. In the event that the JSP numbers increase then there is a reasonable probability that the requirement in rural South Gloucestershire might increase further, as it has already been identified to deliver more homes if necessary, and AK believes is capable of delivering much more than the 1,300 - 1,800 that is subject of the present distribution. |

4) Critically AK considers that the SGLP should plan for the entirety of the 1,800 homes. There is no sense in not doing so. Responding to the issue now is vital in ensuring that the contingency 'pot' can respond at the earliest opportunity and when required to do so, not to have to wait for LP Review which could take years. Given the issues surrounding the delivery of many of the SDLs AK considers that there is little doubt that the contingencies will be required during the Plan Period. The opportunity to increase the supply of housing should be taken now, albeit AK is not resistant to a cascade arrangement whereby the sites that form part of the 500 homes contingency can be identified as such and necessary (but flexible) restrictions be enshrined in Policy.

5) For the reasons set out below AK supports Option 3, which is to identify non-strategic growth both inside and outside of the Green Belt. In addition to the commentary above regarding the specific JSP contingency AK further considers that this LP process should identify sites to be safeguarded from the Green Belt for future housing delivery. This complies entirely with Paragraph 85 of the NPPF and in particular the requirements that state:

o Where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the Plan Period;

o Make clear that the safeguarded land is not allocated for development at the present time. Planning Permission for the permanent development of safeguarded land should only be granted following a Local Plan Review which proposes the development;

o Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development Plan Period.

6) Given the context for Green Belt release now, both in terms of new Strategic Development Locations (SDLs) and non-strategic locations, there can be little doubt that further Green Belt releases will be required in any LP Review. The urban living opportunity is a finite source of supply and there are few remaining sustainable locations for growth outside of the Green Belt to deal with the inevitable continuous pressure to accommodate the needs of the sub-region and South Gloucestershire at the end of the Plan Period. In order to maintain permanence of the Green Belt, the matter of safeguarding needs to be addressed now.

7) If areas of Green Belt are reviewed, assessed and included for such safeguarding at this time, it would result in proactive Planning and may avoid another Green Belt review in the short to medium term with appropriate phasing restrictions being able to be applied through Policy. Accordingly it is important for South Gloucestershire Council over the coming Months to identify further contingency site possibilities exceeding the identified 500 unit target to ensure that effective long term housing delivery is achievable and that the Plan remains in accordance with the NPPF, specifically its Green Belt and Local Plans' Plan making Policies.

8) It is acknowledged that the Government attaches great importance to the Green Belt and when reviewing Green Belt boundaries, Local Planning Authorities should take account of the need to promote sustainable patterns of development, considering the consequences for sustainable development of channelling development towards urban areas as well as villages and towns within the Green Belt.

9) AK welcomes the Council's acknowledgement in the Draft Plan that a significant proportion (61%) of South Gloucestershire is covered by the Bristol and Bath Green Belt. Whilst a key aim of the Planning System is to protect areas of Green Belt which serve a useful purpose, given the scale of housing delivery required over the next 20 years, for the reasons set out below it is realistic to expect that some of this housing will have to be accommodated in areas currently identified as Green Belt. This has already been ably demonstrated through the JSP that identifies there are no further locations capable of delivering strategic growth; Coalpit Heath and Yate SDLs are both located in the Green Belt and the Plan envisages a capacity of 3,800 homes being located here. For the reasons set out below AK considers the same contention can be applied to non-strategic growth in South Gloucestershire.

10) Alder King consider that Option 1, looking only at areas outside the Green Belt would present real difficulty in ensuring delivery of the new housing is identified in sustainable locations. Some of the locations have already been subject to and/or identified for levels of growth appropriate for the size of the settlement such as Failand and Chipping Sodbury, whilst others simply do not have the services to support anything more than minor growth regardless of their Green Belt status such as Hawkesbury Upton and Marshfield. Growth in locations such as these will only exacerbate travel by car and the scale of growth proportionate to the size of the village would be insufficient to make significant improvements to Public Transport services.

11) Taking the list of 9 places outside the Green Belt identified as appropriate for investigation in Option 1, whilst an average 20% growth of each of these locations could just about (on paper) deliver the required 1,300 homes, a number of these locations could not be realistically considered feasible for such growth and certainly not all of the contingency sites would be catered for. Villages such as Rangeworthy, Cromhall and Old Sodbury are in some cases little more than ribbon development with limited services and almost half of these are located within and constrained by the Cotwolds AONB. While it is agreed that some development in these locations could assist in supporting the longevity of local rural services, it is not the case that all these locations should take 20% extra growth in order to meet the housing figures required. In any event, it would not meet the actual requirement of 1,800 homes.

12) Turning to more established rural areas that could be considered more feasible in the list of 9 in Option 1, when additional growth of these locations is reviewed in conjunction with and addition to existing allocated/Permitted Development including that in the JSP, it is fair to say that a number of these have already been allocated a proportionate level of growth during the existing Plan Period. Failand and Engine Common are good examples; extra growth here would represent a disproportionate amount of new development for that locality.

13) In respect of Chipping Sodbury, the settlement has been identified as a contingency site for strategic growth of 1,500 houses in the Draft JSP. It is highly likely that this will come forward over the Plan Period and whilst Chipping Sodbury is an established area and capable of a sustainable growth, to allocate more sites of any significance at Chipping Sodbury for non-strategic growth would likely result in over-development of the location, especially when read with the recent and future allocations intended for the adjoining area of Yate. Allocation of non-strategic sites should complement the strategic growth in the JSP and should result in proportionate and balanced development of villages. To add further development to Chipping Sodbury, however apparently sustainable a place it appears in isolation, would not be appropriate.

14) In light of the contingency allocation of 1,500 homes at Chipping Sodbury, and AKs contention that there is a high possibility of this site being required to deliver in the next 20 years, it is considered that Chipping Sodbury should be removed entirely from the list of 35 rural places for investigation for non-strategic growth and instead be indicated as a (contingency) SDL settlement. Chipping Sodbury should be elevated to the same status as Yate, Thornbury, Coalpit Heath, Charfield and Buckover.

15) AK considers that there are exceptional circumstances for reviewing Green Belt boundaries and areas for development allocation inside the Green Belt boundary in this context of delivery of sustainable growth in rural South Gloucestershire. As such it is recommended that Option 3, reviewing areas within the Green Belt as well as outside the Green Belt is the best option to achieve the most appropriate form of sustainable

| | |
|---|---|
| | growth. Indeed, the proximity of the Green Belt to major urban areas makes it inherently more sustainable to build in, in terms of supporting further investment in Public Transport and minimising the use of, and distances travelled by, the private car.<br><br>16) Some locations identified within the Green Belt are inherently sustainable and capable of delivering non-strategic growth. Equally there are potentially sound locations in the Green Belt that are unfeasible to accommodate growth due to the physical constraints of their surroundings and topography.<br><br>17) Alveston for example has been identified as a place in the Green Belt to be investigated for housing growth and was reviewed as such as part of the JSP. Alveston could well be considered a sustainable location well placed for transport links and access to community facilities. Nevertheless, the JSP Evidence Base1 for the settlement demonstrates Spatial constraints preventing it from significant growth. For example to the North East, and South West the Green Belt provides an important function separating it from Thornbury and Rudgeway, preventing urban sprawl and the coalescence of these villages. It also has a number of landscape, ecology and heritage constraints in proximity to the Golf Club to the North, and built form including the defensible boundary of the A38 running NE - SW effectively preventing non-strategic development potential to the East. Having been assessed historically and recently, there have been no allocations for some time at Alveston despite its sustainability credentials; and it is difficult to see where it could feasibly grow in a way that wouldn't undermine core Planning principles.?<br><br>1 Assessment of Strategic Development Locations Beyond Settlement Boundaries - Location Dashboards (November 2016). |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David and Tracey Jones |
| **Comment ID** | 19883585/969 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Non-Strategic Growth:**<br><br>I agree with the proposal to make provision for small-scale development in South Gloucestershire's villages where this can be done without significant harm to their character and amenities, and without damage to, or loss of valuable built, historic or natural assets. South Gloucestershire should engage directly with residents and their Representatives before allocating sites and numbers of homes to particular places. Wherever possible, individual sites should only be allocated with the agreement of local people. The design of any new rural developments should enhance the local character and be in sympathy with the local historic architecture. The scale should be in sympathy with the size of the settlement and not overwhelm it.<br><br>The Draft Joint Spatial Plan sets the "non-strategic" (rural) requirement at 1,300 homes in South Gloucestershire. Of the three options in the Local Plan proposals for delivering this, Option 3 would spread it over all 35 sustainable rural settlements, whether or not in the Green Belt. This would be preferable to limiting it to the 12 rural settlements with non-Green Belt status as they would be overwhelmed and their character destroyed. I do not support Option 2 (development confined to rural places inside the Green Belt). Given the very strong Policy presumption against development in the Green Belt, and its sensitivity locally, sites should be chosen in conjunction with local residents and their Representatives. Where they would be in the Green Belt the "exceptional circumstances" test should still be applied.<br><br>There should be no "double jeopardy." Should the North West Yate strategic development become part of the new Local Plan it would have a massive and negative impact on Engine Common, Nibley and Iron Acton Village. In these circumstances they should not be subject to further non-strategic developments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David Moodie |
| **Comment ID** | 19732737/979 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Please see supporting Representations Document and Call for Sites Submission. |
| **Attached documents** | Mr. David Moodie - Fisher German LLP (Ms. Angela Smedley).pdf (578 KB) |

| | |
|---|---|
| **Respondent Name** | Eric Heath - Avon Wildlife Trust |
| **Comment ID** | 19883713/995 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | iii. Option 3 (Both Inside & Outside the Green Belt). |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Cate Davidson - Sodbury Town Council |
| **Comment ID** | 4877793/1007 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Dear Planning Team, |

| | |
|---|---|
| | Sodbury Town Council responds as follows to the Local Plan (non strategic) Consultation:<br><br>Q. 3:<br><br>3.2 STC believes that sites both inside and outside of the Green Belt should be considered on their own merits without a blanket Policy (Option 3).<br><br>Please note the Comments as appropriate. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hannah Spanton - Badminton Estate |
| **Comment ID** | 19884225/1029 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 3, presents itself for the best opportunity for sustainable new growth in the District over the Plan Period. It is apparent that growth points and extensions to existing large towns and cities are the most sustainable for large strategic growth. The Local Plan should ***not*** however preclude growth in smaller settlements or within the Green Belt which previous iterations of Planning Policy have largely ignored in the past. The Green Belt contains some very sustainable locations and sensitive growth within these areas should not necessarily lead to the coalescence of settlements or erode its openness. The Local Plan should therefore look at sensitive amendments to the Green Belt boundary in order to support more sustainable patterns of growth. As set out above, incremental growth within the smaller settlements combined with sustainable growth within the Green Belt is considered to be the most appropriate option for non-strategic growth.<br><br>The current assessment of sites within the Local Plan is considered to be too restrictive and all rural settlements within South Gloucestershire should be considered on their merits.<br><br>It is acknowledged within Appendix 3 that in the AONB, there has not been planned development in many rural areas for a significant period of time, unlike in other neighbouring Authorities. There is clearly a need to allocate sites within rural areas in South Gloucestershire to ensure that these communities can thrive over the long-term. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Adrian and Judy Howourth |
| **Comment ID** | 19843649/1055 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Hello,<br><br>We appreciate that new homes are required in the South Glos area. However I would like to lodge our objection to any form of development of the South Glos Green Belt areas. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | L. Heland |
| **Comment ID** | 19780097/1070 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Hello,<br><br>I am a South Glos resident living in and I am writing to give my feedback on the new Local Plan. I strongly and passionately believe we should protect our Green Belt and green spaces areas at all costs. I therefore favour Option 1 on the Consultation Document. I understand there is pressure to create more housing for people but this must be achieved by: (1) Building on/developing Brownfield sites; (2) Forcing developers to build on sites which have already been granted Planning Permission; (3) Provide incentives to private homeowners to rent out rooms where they live in houses with spare capacity.<br><br>Thank you for the opportunity to give feedback. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Robin Pearce - Bristol & England Properties |
| **Comment ID** | 19884417/1073 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |

| | |
|---|---|
| **Comment** | 2) The SGLP identifies that 1,300 new homes are required with a potential contingency of 500 dwellings on individual non-strategic sites. Whilst Alder King (AK) has submitted Representations to the JSP contending that the identified overall housing need figure is insufficient to meet the needs of the West of England, the general intention to provide additional housing for non-strategic growth in line with the JSP is supported. Clearly the SGLP will need to respond to any changes in the quantum and distribution of development should the JSP be subject to modification.<br><br>3) It is interesting to reflect on the fact that in the JSP there are three contingency options for accommodating any shortfall in delivery, at Clevedon, Chipping Sodbury and via the additional 500 homes in 'rural' South Gloucestershire. In the event that the JSP numbers increase then there is a reasonable probability that the requirement in rural South Gloucestershire might increase further, as it has already been identified to deliver more homes if necessary, and AK believes is capable of delivering much more than the 1,300 - 1,800 that is subject of the present distribution.<br><br>4) Critically AK considers that the SGLP should plan for the entirety of the 1,800 homes. There is no sense in not doing so. Responding to the issue now is vital in ensuring that the contingency 'pot' can respond at the earliest opportunity and when required to do so, not to have to wait for LP Review which could take years. Given the issues surrounding the delivery of many of the SDLs AK considers that there is little doubt that the contingencies will be required during the Plan Period. The opportunity to increase the supply of housing should be taken now, albeit AK is not resistant to a cascade arrangement whereby the sites that form part of the 500 homes contingency can be identified as such and necessary (but flexible) restrictions be enshrined in Policy.<br><br>5) For the reasons set out below AK supports Option 3, which is to identify non-strategic growth both inside and outside of the Green Belt. In addition to the commentary above regarding the specific JSP contingency AK further considers that this LP process should identify sites to be safeguarded from the Green Belt for future housing delivery. This complies entirely with Paragraph 85 of the NPPF and in particular the requirements that state:<br><br>o Where necessary, identify in their Plan's areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the Plan Period;<br><br>o Make clear that the safeguarded land is not allocated for development at the present time. Planning Permission for the permanent development of safeguarded land should only be Granted following a Local Plan Review which proposes the development;<br><br>o Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development Plan Period.<br><br>6) Given the context for Green Belt release now, both in terms of new Strategic Development Locations (SDLs) and non-strategic locations, there can be little doubt that further Green Belt releases will be required in any LP Review. The urban living opportunity is a finite source of supply and there are few remaining sustainable locations for growth outside of the Green Belt to deal with the inevitable continuous pressure to accommodate the needs of the sub-region and South Gloucestershire at the end of the Plan Period. In order to maintain permanence of the Green Belt, the matter of safeguarding needs to be addressed now.<br><br>7) If areas of Green Belt are reviewed, assessed and included for such safeguarding at this time, it would result in pro-active Planning and may avoid another Green Belt Review in the short to medium term with appropriate phasing restrictions being able to be applied through Policy. Accordingly it is important for South Gloucestershire Council over the coming Months to identify further contingency site possibilities exceeding the identified 500 unit target to ensure that effective long term housing delivery is achievable and that the Plan remains in accordance with the NPPF, specifically its Green Belt and Local Plan's Plan making Policies.<br><br>8) It is acknowledged that the Government attaches great importance to the Green Belt and when reviewing Green Belt boundaries, Local Planning Authorities should take account of the need to promote sustainable patterns of development, considering the consequences for sustainable development of channelling development towards urban areas as well as villages and towns within the Green Belt.<br><br>9) AK welcomes the Council's acknowledgement in the Draft Plan that a significant proportion (61%) of South Gloucestershire is covered by the Bristol and Bath Green Belt. Whilst a key aim of the Planning System is to protect areas of Green Belt which serve a useful purpose, given the scale of housing delivery required over the next 20 years, for the reasons set out below it is realistic to expect that some of this housing will have to be accommodated in areas currently identified as Green Belt. This has already been ably demonstrated through the JSP that identifies there are no further locations capable of delivering strategic growth; Coalpit Heath and Yate SDLs are both located in the Green Belt and the Plan envisages a capacity of 3,800 homes being located here. For the reasons set out below AK considers the same contention can be applied to non-strategic growth in South Gloucestershire.<br><br>10) Alder King consider that Option 1, looking only at areas outside the Green Belt would present real difficulty in ensuring delivery of the new housing is identified in sustainable locations. Some of the locations have already been subject to and/or identified for levels of growth appropriate for the size of the settlement such as Failand and Chipping Sodbury, whilst others simply do not have the services to support anything more than minor growth regardless of their Green Belt status such as Hawkesbury Upton and Marshfield. Growth in locations such as these will only exacerbate travel by car and the scale of growth proportionate to the size of the village would be insufficient to make significant improvements to Public Transport services.<br><br>11) Taking the list of 9 places outside the Green Belt identified as appropriate for investigation in Option 1, whilst an average 20% growth of each of these locations could just about (on paper) deliver the required 1,300 homes, a number of these locations could not be realistically considered feasible for such growth and certainly not all of the contingency sites would be catered for. Villages such as Rangeworthy, Cromhall and Old Sodbury are in some cases little more than ribbon development with limited services and almost half of these are located within and constrained by the Cotwolds AONB. While it is agreed that some development in these locations could assist in supporting the longevity of local rural services, it is not the case that all these locations should take 20% extra growth in order to meet the housing figures required. In any event, it would not meet the actual requirement of 1,800 homes.<br><br>12) Turning to more established rural areas that could be considered more feasible in the list of 9 in Option 1, when additional growth of these locations is reviewed in conjunction with and addition to existing allocated/permitted development including that in the JSP, it is fair to say that a number of these have already been allocated a proportionate level of growth during the existing Plan Period. Failand and Engine Common are good examples; extra growth here would represent a disproportionate amount of new development for that locality.<br><br>13) In respect of Chipping Sodbury, the settlement has been identified as a contingency site for strategic growth of 1,500 houses in the Draft JSP. It is highly likely that this will come forward over the Plan Period and whilst Chipping Sodbury is an established area and capable of sustainable growth, to allocate more sites of any significance at Chipping Sodbury for non-strategic growth would likely result in over-development of the location, especially when read with the recent and future allocations intended for the adjoining area of Yate. Allocation of non-strategic sites should complement the strategic growth in the JSP and should result in proportionate and balanced development of villages. To add further development to Chipping Sodbury, however apparently sustainable a place it appears in isolation, would not be appropriate. |

| | |
|---|---|
| | 14) In light of the contingency allocation of 1,500 homes at Chipping Sodbury, and AKs contention that there is a high possibility of this site being required to deliver in the next 20 years, it is considered that Chipping Sodbury should be removed entirely from the list of 35 rural places for investigation for non-strategic growth and instead be indicated as a (contingency) SDL settlement. Chipping Sodbury should be elevated to the same status as Yate, Thornbury, Coalpit Heath, Charfield and Buckover.<br><br>15) AK considers that there are exceptional circumstances for reviewing Green Belt boundaries and areas for development allocation inside the Green Belt boundary in this context of delivery of sustainable growth in rural South Gloucestershire. As such it is recommended that Option 3, reviewing areas within the Green Belt as well as outside the Green Belt is the best option to achieve the most appropriate form of sustainable growth. Indeed, the proximity of the Green Belt to major urban areas makes it inherently more sustainable to build in, in terms of supporting further investment in Public Transport and minimising the use of, and distances travelled by, the private car.<br><br>16) Some locations identified within the Green Belt are inherently sustainable and capable of delivering non-strategic growth. Equally there are potentially sound locations in the Green Belt that are unfeasible to accommodate growth due to the physical constraints of their surroundings and topography.<br><br>17) Alveston for example has been identified as a place in the Green Belt to be investigated for housing growth and was reviewed as such as part of the JSP. Alveston could well be considered a sustainable location well placed for transport links and access to community facilities. Nevertheless, the JSP Evidence Base1 for the settlement demonstrates Spatial constraints preventing it from significant growth. For example to the North East, and South West the Green Belt provides an important function separating it from Thornbury and Rudgeway, preventing urban sprawl and the coalescence of these villages. It also has a number of landscape, ecology and heritage constraints in proximity to the Golf Club to the North, and built form including the defensible boundary of the A38 running NE - SW effectively preventing non-strategic development potential to the East. Having been assessed historically and recently, there have been no allocations for some time at Alveston despite its sustainability credentials; and it is difficult to see where it could feasibly grow in a way that wouldn't undermine core Planning Principles.<br><br>1 Assessment of Strategic Development Locations Beyond Settlement Boundaries - Location Dashboards (November 2016) |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Clifton Homes Ltd |
| **Comment ID** | 16617921/1082 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Please see submitted Representations.** |
| **Attached documents** | Clifton Homes Ltd - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (1.7 MB) |

| | |
|---|---|
| **Respondent Name** | South West Strategic Development and Ian and David Knipe |
| **Comment ID** | 19884577/1106 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Please see submitted Representations. |
| **Attached documents** | SW Strategic Development and I. and D. Knipe - Grass Roots.pdf (27.4 MB) |

| | |
|---|---|
| **Respondent Name** | Progold Ltd |
| **Comment ID** | 19737665/1120 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Please see submitted Representations. |
| **Attached documents** | Progold Ltd - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (7.9 MB) |

| | |
|---|---|
| **Respondent Name** | Susan E. Green - Home Builders Federation (HBF) |
| **Comment ID** | 10761601/1133 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | The Council should pursue Option 3 (sites both inside & outside the Green Belt) for the distribution of non-strategic growth (circa 1,300 dwellings and the potential additional 500 new homes contingency). Option 3 identifies the highest number of rural places (35) which provides the greatest opportunity to allocate the widest possible range of non-strategic sites including smaller sized sites across the District. Option 3 also has the largest number of localities with walking/cycling access and Public Transport connections (below 30 minute journeys) to places containing key services and facilities which will reduce dependency on car journeys. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Emma Powell - Redrow Homes Limited |
| **Comment ID** | 19737921/1149 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |

| | |
|---|---|
| **Comment** | Pegasus consider that it will be necessary for a combination of options to be considered in order to ensure that sufficient housing is delivered in the Plan Period. Paragraph 2.62 states that the Green Belt covers 61% of the District and that in order to accommodate at least 1,300 new homes and the potential 500 homes contingency, it is likely to require land both outside and within the Green Belt to be investigated. It is noted that the settlement of Hambrook is included in both Option 2 and Option 3, this is supported.<br><br>The NPPF (2012) states that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Para 84 states that:<br><br>"*When drawing up or reviewing Green Belt boundaries Local Planning Authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary."*<br><br>Through the West of England JSP a Stage 1 and Stage 2 Assessment has been undertaken. Appendix 3 to the Consultation version of the Local Plan states that "*Only some areas of the Green Belt adjacent the urban edge and within the wider countryside were assessed as part of the JSP.*"<br><br>However, the Stage 2 Assessment focussed on specific areas of the Green Belt where the consequences of change may need to be examined in more detail. This is consistent with Government Policy which refers to the permanence of Green Belts and says that changes to boundaries are made only in exceptional circumstances. It is also consistent with the NPPF Para 84 as referred to above.<br><br>"*The Stage 2 Assessment has been focussed on locations subject to assessment as part of the work to examine potential Strategic Development Locations for consideration in the preparation of the Joint Spatial Plan. The Joint Spatial Plan Issues and Options Document identified a number of potential Strategic Development Locations including locations within the Green Belt. These have provided the basis for the consideration of Strategic Development Locations and are the areas on which the Stage 2 Green Belt Assessment is focussed.*"<br><br>The assessment concluded that all three Cells around the settlement of Hambrook (17a, 17b and 17c) made a limited contribution to the purposes of Green Belt.<br><br>In respect of Cell 17b, Land off Bristol Road, Hambrook, the Stage 2 Assessment concludes:<br><br>"*This is one of three relatively small Cells enclosed by the M4, M32 and A4174. The Western part of the Cell falls within the Hambrook Conservation Area. The limited size of the Cell and role of the M4 is considered to reduce its role in preventing sprawl in this location. The M4 separates the Cell from the wider Green Belt, although there is a degree of connectivity provided by the River Frome and Frome Valley Walkway to Green Belt in the North, the Cell is relatively isolated.*"<br><br>The Draft NPPF, Para 136 states that before concluding that exceptional circumstances exist to justify changes to the Green Belt, the strategic Plan making Authorities should have examined fully all reasonable options for meeting its identified need for development.<br><br>The emerging South Gloucestershire Local Plan clearly has a focus on urban living and the use of Brownfield sites, but it is recognised that capacity in the urban areas will not be sufficient to meet housing needs e.g. Para 2.1 *"A continuation of this pattern of development growth alone will not achieve the amount or quality of development that is required to meet our objectives for the District."*<br><br>Pegasus welcome the fact that the Council acknowledge that a continuation of the previous Strategy will not provide sufficient opportunities for growth and consequently there is a need to review the Green Belt in order to deliver a sustainable Strategy for South Gloucestershire.<br><br>Option 2 - Land i.e. within the Green Belt is recognised as providing potential for many more places than Option 1, more places in this option have walking and cycling access to some key services and facilities, and Public Transport connections (below 30 minute journeys) to places) to places containing services and facilities. This can help reduce dependency on car journeys and avoid isolated rural dwellings.<br><br>The Consultation Document identifies the positive and negatives of each Option and areas of uncertainties. Some settlements in Option 2 may be affected by Flood Zone 2 or 3, SSI, Conservation Areas, Listed Buildings etc.<br><br>A number of Technical Reports have been prepared to support the promotion of Land off Bristol Road, Hambrook and these have been included in Appendix 1 i.e. Sustainability Appraisal of the site. The majority of the site area is in Flood Zone 1, indicating a low level of risk from fluvial or tidal flood sources. A small portion of the site area is located in Flood Zone 2 and 3, adjacent to the watercourses. These areas could be utilised for less vulnerable uses, such as Public Open Space or water compatible development such as sports fields or areas for nature conservation. Residential development would be steered out of these areas.<br><br>The majority of the site is shown to be unaffected by surface water flooding. There are some parts of the site area that are at risk from surface water flooding, although these are generally adjacent to the watercourses in areas also affected by fluvial flooding.<br><br>The site is within the Hambrook Conservation Area and comprises the Eastern part of the Conservation Area. There is a Grade 2 Listed Building, Hambrook Grove and a locally Listed park. A heritage led design response will ensure that any development that comes forward at the site results in less than substantial harm to the aforementioned heritage assets. |

| | |
|---|---|
| | There are no SSSI.<br><br>The Land off Bristol Road, Hambrook is an exceptionally sustainable location in Bristol's urban fringe and well aligned with existing infrastructure with regards to walking, cycling and Public Transport, with the MetroBus route planned to be adjacent to the site frontage. The combination of the excellent sustainable travel opportunities within the surrounding area provides a significant opportunity for future residents to travel sustainably, as opposed to the private car.<br><br>There are a wide range of exceptional facilities, amenities, and employment within easy walking and cycling distance of the development. The routes to these facilities are in good condition, with a number of Sustrans routes within close proximity; notably Sustrans Regional Route 16 passing adjacent to the site along the A4174.<br><br>The MetroBus is set to operate adjacent to the site along the A4174, providing fast, frequent and reliable Public Transport to a number of key destinations, such as Bristol City Centre, Aztec West, and South Bristol. The development is located in the perfect location for trips to be made by MetroBus as opposed to the private car.<br><br>In summary, the site is located within a parcel of the Green Belt which is well defined and enclosed by several significant physical barriers which detaches it from the wider countryside. From the evidence to the JSP it is clear that the site does not from a significant part of the Green Belt compared to other parcels in the Green Belt.<br><br>As referred to above a Sustainability Appraisal of the site has been prepared and is included as Appendix 1 which demonstrates the site's sustainability credentials. |
| **Attached documents** | Redrow Homes Limited (Emma Powell) - Pegasus Group (Mrs. Sarah Hamilton-Foyn).pdf (34.1 MB) |

| | |
|---|---|
| **Respondent Name** | Cath Purchase |
| **Comment ID** | 19839777/1184 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Dear Sir/Madam,<br><br>I am writing in response to the Local Plan Consultation Document to express my areas of concern.<br><br>Referring to the Non-Strategic Development Question 3 on Page 71, this refers to 1,300 new homes which will be built in Rural Sites. The areas identified include Olveston, Tockington, Old Down, Almondsbury, Alveston and Hortham Village.<br><br>As a resident of the and community I would like to propose the development should not be within the Green Belt.<br><br>My reasons are as follows:<br><br>1. Increased housing will result in increased traffic through the villages of Tockington and Olveston. There is already an issue with the extensive traffic moving through the villages (This is to be made worse by the forthcoming withdrawal of the tolls on the Severn Bridge Crossing at the end of 2018). The current situation is that there is a particular issue with the villages being used as a cut-through from Yate and Bristol areas to Wales.<br><br>2. Parking in the area is also an issue in both villages, in particular around the Green in Tockington and The Street and Olveston Primary School in Olveston. To increase the number of cars parked with increased housing could result in accidents particularly with the children who walk to School along roads with narrow or no pavements.<br><br>I am involved in a Traffic and Parking Sub Group in the area led by concerned local residents and have *attached a copy of the discussion document our Group published in the local Parish Magazine for your information.*<br><br>3. I wish to retain the character and appearance of our beautiful villages. They have been preserved for Centuries and this is why we chose to live in the area. It's really important to maintain these few Green Belt areas which are already being eroded in the country.<br><br>4. The areas of Olveston and Tockington have very limited amenities and could not sustain an increase in population. There is a limited Public Transport service and very few shops and local facilities.<br><br>5. There is a lack of local employment opportunities in the area, and limited transport to reach workplaces. Local people are already car-dependent. |
| **Attached documents** | Cath Purchase.pdf (132 KB) |

| | |
|---|---|
| **Respondent Name** | Neil Wilkins |
| **Comment ID** | 19839905/1218 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | - Supports Option 2: Rural Places in the Green Belt, including Land at Webb's Heath Farm. The options for large scale residential development in sustainable rural locations outside the Green Belt or on Brownfield land no longer exist and it is now time to consider how the Green Belt can contribute to delivering major housing development without eroding its role and function.<br><br>The submitter wishes to be notified of further Consultations by email and would like to be considered for invitation to the Examination of the submitted Plan. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sophie Feeney |
| **Comment ID** | 19845057/1231 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | I think it is unacceptable and sad to think that green space and Green Belt land is being concerned to be built all over and will completely change Longwell Green/Hanham. I thought the purpose of Green Belt was for the land to be protected from development?<br><br>I would ask the Council to reconsider such proposals. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Messrs Keller, Grace, Moorlen and Barnes |
| **Comment ID** | 19889409/1237 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Part 1 (Housing Requirements) and Part 2 (Spatial Strategy) including Questions 1, 2, 3 and Strategic Development Locations:<br><br>Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Messrs Keller, Grace, Moorlen and Barnes - Pegasus Group (Mr. Daniel Weaver).pdf (423 KB) |

| | |
|---|---|
| **Respondent Name** | Reuben Bellamy - Lone Star Land Limited |
| **Comment ID** | 19738529/1245 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Question 3.2:<br><br>Para 83 of the NPPF states that *"Green Belt boundaries should only be altered in exceptional circumstances."* The Draft NPPF, Para 136 seeks to introduce, for want of a better phrase, a sequential approach to the review of Green Belt boundaries, to demonstrate that all other reasonable options, other than Green Belt land have been fully considered.<br><br>With this in mind, whilst it is acknowledged that Para 12 (Page 20) of the submitted West of England Joint Spatial Plan (November 2017) indicates that there are exceptional circumstances to justify the release of certain locations from the Green Belt, any Green Belt release at the local level through the Emerging Local Plan will need to meet the criteria in the Draft NPPF and evidence this in the Draft Documentation.<br><br>On this basis, Option 1 should be followed first, i.e. development outside the Green Belt, followed by Option 3 once the sequential approach set out in the Emerging NPPF has been fully examined. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anita and Colin Houlding |
| **Comment ID** | 19840289/1266 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | We should not be considering the development of land designated as Green Belt. There is little of this remaining and its loss will be damaging not only to human health and wellbeing, but also to wildlife and the environment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Conor Lee - Hannick Homes |

| | |
|---|---|
| **Comment ID** | 11945985/1316 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | |

2) The Draft South Gloucestershire Local Plan ('SGLP') identifies that 1,300 new homes are required to be delivered over the Plan Period on non-strategic sites, with a potential contingency of 500 additional dwellings. Whilst Alder King (AK) has submitted Representations to the Joint Spatial Plan (JSP) contending that the identified overall housing need figure is insufficient to meet the needs of the West of England, the general intention to provide additional housing for non-strategic growth in line with the JSP is supported. Clearly the SGLP will need to respond to any changes in the quantum and distribution of development should the JSP be subject to modification.

3) It is interesting to reflect on the fact that in the JSP there are three contingency options for accommodating any shortfall in delivery, at Clevedon, Chipping Sodbury and via the additional 500 homes in 'rural' South Gloucestershire. In the event that the JSP numbers increase, then there is a reasonable probability that the requirement in rural South Gloucestershire might increase further, as it has already been identified to deliver more homes if necessary. AK believes that the SGLP is capable of delivering much more than the 1,300 - 1,800 dwellings currently targeted.

4) Critically, AK considers that the SGLP should plan for the entirety of the 1,800 homes. There is no sense in not doing so. Responding to the issue now is vital in ensuring that the contingency 'pot' can respond at the earliest opportunity and when required to do so, not to have to wait for a Local Plan Review which could take years. Given the issues surrounding the delivery of many of the Strategic Development Locations (SDLs), AK considers that there is little doubt that the contingencies will be required during the Plan Period. The opportunity to increase the supply of housing should be taken now, albeit AK is not resistant to a cascade arrangement whereby the sites that form part of the 500 homes contingency can be identified as such and necessary (but flexible) restrictions be enshrined in Policy.

5) As acknowledged by the SGLP, a significant proportion of South Gloucestershire, some 61% falls within the Bristol and Bath Green Belt which surrounds and separates Bristol and Bath and the Cotswolds Area of Outstanding Natural Beauty (AONB). The Government attaches great importance to the Green Belt as expressed in the National Planning Policy Framework (NPPF, 2012) and this Policy is set to continue in the revised NPPF (Consultation Draft March 2018). The revised Draft Framework directs Local Authorities to examine all reasonable options for growth before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries. The requirement to promote sustainable patterns of development is maintained in any Green Belt Review in order to avoid consequential boundary review at the end of the Plan Period. To that end, we welcome the three options put forward by SGC for Consultation which accords with the adopted and emerging Government Policy and take the opportunity to make the following Comments on the options presented:

6) **Option 1 (Rural Places Outside of the Green Belt):**

We support the Strategy of directing development towards sustainable settlements outside of the designated Green Belt, with the aim of protecting the Green Belt while also promoting sustainable patterns of development. However, we consider it unrealistic and unsustainable to direct all of the housing requirement to areas outside of designated Green Belt for the reasons set out below. Option 1 identifies 12 places outside the Green Belt as appropriate for investigation. If the 1,300 – 1,800 dwellings required were to be distributed amongst the 12 settlements, this would lead to significant change at some of the smaller settlements and also unsustainable patterns of growth. In addition:

o Of the 12 settlements identified, five simply do not have the services to support anything more than minor growth and thereby score poorly in respect of access to most key services and facilities1. While it is agreed that some development in settlements such as Cromhall, Falfield, Horton, Old Sodbury or Rangeworthy could assist in supporting the longevity of local rural services, it is not the case these locations should be subject to significant change to meet the housing figures required notwithstanding the actual requirement of 1,800 homes. The lack of services at these locations would mean that new development is likely to be highly dependent on the private car leading to unsustainable patterns of growth. The impact of these patterns of development could not be readily mitigated by Public Transport improvements in these locations; smaller and medium size sites simply could not viably provide for the Public Transport improvements required to overcome the lack of self-containment. This level of change could not be sustainably accommodated at these locations and would likely lead to strategic change at any given location to ensure the necessary infrastructure improvements are delivered; and

o Many of these locations (Cromhall, Hawkesbury Upton, Marshfield, Old Sodbury and Horton) also fall within the Cotswold Area of Outstanding Natural Beauty (AONB). As acknowledged by the SGLP2, while national Policy doesn't preclude development within the AONB, it does require careful consideration to the scale, form and design of development in order to avoid harm on the AONB. This will therefore limit the scale of development which can be accommodated within these settlements.

7) Taken as a whole, this describes the limitations of pursing Option 1 through the formal Plan making process, which if pursued would require the mainstay of the non-strategic requirement to be focused within settlements such as Frampton Cottrell, Tytherington and Wickwar. Such development should, in itself, be proportionate to the size of these settlements which are unlikely to be able to deliver the 1,800 homes requirement without strategic change at each of these three settlements.

8) **Option 2 (Rural Places Inside the Green Belt):**

Notwithstanding the fact that many of the settlements identified invariably provide good access to services by virtue of being in close proximity to the existing urban areas, this option could not be pursued without significant harm to the designated Green Belt in conflict with Government Policy. Given that alternatives exist outside of the designated Green Belt, this approach is likely to conflict with the Framework at Paragraph 88 which confirms that 'Very Special Circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness is outweighed by other considerations.

1 Sustainable Appraisal: Sustainable Access Villages and Settlements Findings 2018.
2 Paragraph 2.64 to 2.65.

9) **Option 3 (Rural Places Both Inside and Outside the Green Belt):**

For the reasons provided above AK supports Option 3, which seeks to identify non-strategic growth both inside and outside of the Green Belt. In line with Government Policy, priority should be given to preserving the integrity of the Green Belt and promoting sustainable patterns of development and, to that end, settlements such as Wickwar should be given first priority in any Development Strategy. Development at the most sustainable non-Green Belt locations including Wickwar would make a valuable contribution to achieving sustainable growth in the rural areas of South Gloucestershire. For the reasons provided above, AK contends that the following matters should be considered in progressing this option:

o South Gloucestershire Council should carefully consider the need to avoid Green Belt harm in channelling development towards locations within

| | |
|---|---|
| | or inset by the designated Green Belt as well as the implications for sustainable development of locating development in the Green Belt. By way of example, Alveston has been identified as a place in the Green Belt to be investigated for housing growth and was reviewed as such as part of the JSP. Alveston could well be considered a sustainable location well placed for transport links and access to community facilities. Nevertheless, the JSP evidence base3 for the settlement demonstrates Spatial constraints preventing it from significant growth. For example to the North East, and South West the Green Belt provides an important function separating it from Thornbury and Rudgeway, preventing urban sprawl and the coalescence of these villages. It also has a number of landscape, ecology and heritage constraints in proximity to the Golf Club to the North, and built form including the defensible boundary of the A38 running NE - SW effectively preventing non-strategic development potential to the East. Having been assessed historically and recently, there have been no allocations for some time at Alveston despite its sustainability credentials; and it is difficult to see where it could feasibly grow in a way that wouldn't undermine core Planning principles.<br><br>o The allocation of non-strategic sites should complement the strategic growth in the JSP as well as the urban living opportunity areas to ensure the proportionate and balanced development of villages. In respect specifically of strategic growth in the JSP, Chipping Sodbury has been identified as a contingency site for strategic growth of 1,500 houses in the Draft JSP and is set to be delivered within the Plan Period. To add further development to Chipping Sodbury, however apparently sustainable a place it appears in isolation, would not be appropriate. For this reason, it is considered that Chipping Sodbury should be removed entirely from the list of 35 rural places for investigation for non-strategic growth and instead be indicated as a (contingency) SDL settlement; and<br><br>o Regard should be had to the points raised under Paragraph 6 above and in response to Question 3.4 below in any Strategy progressed by the Council.<br><br>3 Assessment of Strategic Development Locations Beyond Settlement Boundaries - Location Dashboards (November 2016). |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hanham Community Trust (Land at Hanham Community Centre) |
| **Comment ID** | 19926241/1329 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | We consider that Option 3 should be the approach towards investigating sites for non-strategic growth; whereby sites inside and outside of the Green Belt are assessed.<br><br>Options 1 and 2 will both lead to unsustainable development patterns and will unnecessarily prevent non-strategic growth from being explored in suitable and sustainable locations. Instead, Option 3 will ensure that all of the potential locations are considered on their own merits. In turn, this will enable the Sustainability Appraisal process to identify the most sustainable non-strategic growth locations once the Evidence Base reaches this level of detailed testing.<br><br>Further to this, a Further Green Belt Assessment will be required to assess the contributions that different locations make towards the five purposes of including land within the Green Belt. This should be undertaken in the context of non-strategic growth, rather than looking at Strategic Development Locations as was the case through the JSP Evidence Base. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Adrian Edmonds |
| **Comment ID** | 19926305/1339 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Non-Strategic Growth:**<br><br>South Gloucestershire should engage directly with residents and their Representatives before allocating sites and numbers of homes to particular places. Wherever possible, individual sites should only be allocated with the agreement of local people. The design of any new rural developments should enhance the local character and be in sympathy with the local historic architecture. The scale should be in sympathy with the size of the settlement and not overwhelm it.<br><br>The Draft Joint Spatial Plan sets the "non-strategic" (rural) requirement at 1,300 homes in South Gloucestershire. Of the three options in the Local Plan proposals for delivering this, I do not support Option 2 (development confined to rural places inside the Green Belt). Given the very strong Policy presumption against development in the Green Belt, and its sensitivity locally, sites should be chosen in conjunction with local residents and their Representatives. Where they would be in the Green Belt the "exceptional circumstances" test should still be applied.<br><br>There should be no "double jeopardy." Should the North West Yate strategic development become part of the new Local Plan it would have a massive and negative impact on Engine Common and Iron Acton Village. In these circumstances they should not be subject to further non-strategic developments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hanham Community Trust (Land at Hanham Sports Ground) |
| **Comment ID** | 20104449/1354 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | We consider that Option 3 should be the approach towards investigating sites for non-strategic growth; whereby sites inside and outside of the Green Belt are assessed. |

| | |
|---|---|
| | Options 1 and 2 will both lead to unsustainable development patterns and will unnecessarily prevent non-strategic growth from being explored in suitable and sustainable locations. Instead, Option 3 will ensure that all of the potential locations are considered on their own merits. In turn, this will enable the Sustainability Appraisal process to identify the most sustainable non-strategic growth locations once the Evidence Base reaches this level of detailed testing.<br><br>Further to this, a Further Green Belt Assessment will be required to assess the contributions that different locations make towards the five purposes of including land within the Green Belt. This should be undertaken in the context of non-strategic growth, rather than looking at Strategic Development Locations as was the case through the JSP Evidence Base. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hanham Community Trust (Land North of Abbots Road) |
| **Comment ID** | 20107489/1371 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | We consider that Option 3 should be the approach towards investigating sites for non-strategic growth; whereby sites inside and outside of the Green Belt are assessed.<br><br>Options 1 and 2 will both lead to unsustainable development patterns and will unnecessarily prevent non-strategic growth from being explored in suitable and sustainable locations. Instead, Option 3 will ensure that all of the potential locations are considered on their own merits. In turn, this will enable the Sustainability Appraisal process to identify the most sustainable non-strategic growth locations once the Evidence Base reaches this level of detailed testing.<br><br>Further to this, a Further Green Belt Assessment will be required to assess the contributions that different locations make towards the five purposes of including land within the Green Belt. This should be undertaken in the context of non-strategic growth, rather than looking at Strategic Development Locations as was the case through the JSP Evidence Base. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | John Mills - Cotswolds Conservation Board |
| **Comment ID** | 19842337/1377 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | As outlined in Response to Question 3.1, the Cotswolds Conservation Board ('the Board') recommends that Option 1 should be ruled out due to the:<br><br>(a) Increased burden that Option 1 places on the Cotswolds Area of Outstanding Natural Beauty (AONB) to accommodate new housing developments; and<br><br>(b) Imbalance between the weight that Option 1 gives to Green Belt designation, compared to AONB designation.<br><br>In theory, Option 2 presents the 'least worst' option for the Cotswolds AONB, with only 3 out of 28 places (11%) being in the AONB, compared to Option 3, which has 5 out of 35 places (14%) in the AONB. However, the actual impact of each option would obviously depend on the proportion of the required 1,800 new homes that would be allocated in the AONB.<br><br>Given that it is unlikely that all of the non-strategic growth that is required in South Gloucestershire would be allocated in the Green Belt, Option 3 would seem to be the most likely option to be taken forward. Whichever option is selected, the Local Plan should address the issues that the Board has raised in Response to Question 3.1, relating to development in – and within the setting of – the Cotswolds AONB. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ms. J. Hillier and Barratt Homes (Bristol) Ltd |
| **Comment ID** | 19740673/1380 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | See attached. |
| **Attached documents** | Ms. J. Hillier and Barratt Homes (Bristol) Ltd - Barton Willmore (Miss. Robyn Nicholl).pdf (792 KB) |

| | |
|---|---|
| **Respondent Name** | IM Land |
| **Comment ID** | 16638625/1400 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | See attached. |
| **Attached documents** | IM Land - Barton Willmore (Miss. Robyn Nicholl).pdf (564 KB)<br>2026 Vision Document 06.pdf (2.2 MB) |

| | |
|---|---|
| **Respondent Name** | ATA Estates (Longwell Green) LLP |
| **Comment ID** | 19740449/1408 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Please see the enclosed Representations in respect of the Local Plan Consultation Document (February 2018). Please note that separate Representations are being submitted in respect of the Consultation on the 2018 Sustainable Access Methodology and the associated Sustainable Access Profiles. |
| **Attached documents** | ATA Estates (Longwell Green) LLP - Walsingham Planning (Mr. Daniel Sharp).pdf (59.8 MB) |

| | |
|---|---|
| **Respondent Name** | Fear Group |
| **Comment ID** | 19927745/1424 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | We support investigation of sites for NSD both inside and outside the Green Belt. Whilst is important to safeguard the role of the Green Belt in fulfilling its five purposes, as set out in the National Planning Policy Framework (NPPF), it is also important at this stage in the preparation of the new Local Plan to allow for flexibility in order to identify a range of sites as part of a sustainable and deliverable Local Plan. In this respect, in addition to likely opportunities outside the Green Belt, there is the potential for sites within the Green Belt, that are deliverable and sustainable, to provide new homes and support existing communities without compromising the purpose of including land within the Green Belt. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Taylor Wimpey |
| **Comment ID** | 20128769/1437 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **iii. Option 3 (Both Inside & Outside the Green Belt):**<br><br>Option 3 is our preferred approach as this option results in the largest range of alternative places and potential sites for growth. A wide range of housing options will be required to ensure that the full OAHN for the District can be accommodated at sustainable sites that are capable of delivering within the Plan Period.<br><br>**Summary:**<br><br>We are in general support for Option 3 as the preferred Strategy for accommodating Non-Strategy Growth within the District both Inside and Outside of the Green Belt. We are also in support of the new Local Plan preparing Policies to guide and define the proposed development at the Strategic Development Locations identified in the Emerging JSP. In particular we are in support of the Strategic Development Location at Thornbury, albeit that we consider it necessary to increase the scale of this and to include potential for development at the South of the town, in order to ensure additional deliverable land for housing is available, so that the District has a realistic chance of maintaining a housing land supply and meeting the true OAHN. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ian Knipe |
| **Comment ID** | 20133153/1459 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **iii. Option 3 (Both Inside & Outside the Green Belt):**<br><br>Option 3 is our preferred approach as this option results in the largest range of alternative places and potential sites for growth. A wide range of housing options will be required to ensure that the full OAN for the District can be accommodated at sustainable sites that are capable of delivering within the Plan Period.<br><br>The Shortwood Lodge site is currently within the Green Belt, however given the role and function of the Bristol and Bath Green Belt as a whole, and considering the specific Spatial context of this site within that designation, it is considered that adjustment of the inner Green Belt Boundary (to remove the area identified within the red line at Appendix 1), potentially accompanied by compensatory additions elsewhere may result in a more sustainable pattern of development.<br><br>The Bristol urban area has now generally been extended up to the inner Green Belt boundary to accommodate necessary development, the point has therefore been reached that the Green Belt is the major impediment to securing the sustainable long-term development of the Bristol urban area. The exceptional circumstances referred to in national Green Belt Policy (NPPF Para 83 and 84) now exist and the appropriate course of action is to:<br><br>*"… Take account of the need to promote sustainable patterns of development" and "Consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards town and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary."*<br><br>The Joint Spatial Plan Green Belt Assessment, November 2015 Study and Stage 2 Green Belt Assessment (November 2016) merely examined whether existing Green Belt boundaries contributed to meeting the defined purposes of Green Belts and whether the existing Green Belt makes a contribution to Green Belt purposes. This approach failed to take into account the above Policy from the NPPF and omitted to properly consider sustainable sites within the existing Green Belt and the opportunities to promote sustainable patterns of development through a review of potential Green Belt boundary changes. The current version of the new Local Plan does not present any further analysis or review of the Green Belt other than relying on what has already been produced for the JSP. |

| | |
|---|---|
| | We request that the Council further considerer such smaller Green Belt release through the new Local Plan and that the site assessment is based on robustly set out methodology that considers not only parcels of the existing Green Belt as a whole, but where, as is the case for Land at Shortwood Lodge specific elements or areas of wider parcels are promoted for residential development that the impact on the overall purposes of the Green Belt of release of those smaller parcels of land alone is considered alongside the potential for compensatory additions elsewhere if necessary.<br><br>Appendix 3 to the new Local Plan Consultation Document specifically acknowledges that such an assessment may be necessary, stating '… I*t may be necessary for further detailed Green Belt assessment of places within or adjoining the Green Belt. This will assess at a more local level the value and potential impact from development on smaller parcels of Green Belt land within and surrounding rural places.'* |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mr. Mike Kerton - Bloor Homes South West and Mr. Jeremy Sutcliffe - Baratt |
| **Comment ID** | 16646593/1465 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Please see attached Representations. |
| **Attached documents** | Bloor Homes South West (Mr. Mike Kerton) and Barratt (Mr. Jeremy Sutcliffe) - Barton Willmore.pdf (14.6 MB) |

| | |
|---|---|
| **Respondent Name** | Rebecca Thompson - Wallace Land Investments |
| **Comment ID** | 19935809/1474 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | The Council should pursue Option 3 (both Inside and Outside the Green Belt) for the distribution of non-strategic growth. This option identifies the highest number of rural places (35), which offers the greatest opportunity to allocate the widest possible range of non-strategic sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Reginald Pearce, Judith Davis & Rachael Shiles |
| **Comment ID** | 19740897/1479 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | 2) The South Gloucestershire Local Plan (SGLP) identifies that 1,300 new homes are required with a potential contingency of 500 dwellings on individual non-strategic sites. Whilst Alder King (AK) has submitted Representations to the Joint Spatial Plan (JSP) contending that the identified overall housing need figure is insufficient to meet the needs of the West of England, the general intention to provide additional housing for non-strategic growth in line with the JSP is supported. Clearly the SGLP will need to respond to any changes in the quantum and distribution of development should the JSP be subject to modification.<br><br>3) It is interesting to reflect on the fact that in the JSP there are three contingency options for accommodating any shortfall in delivery, at Clevedon, Chipping Sodbury and via the additional 500 homes in 'rural' South Gloucestershire. In the event that the JSP numbers increase then there is a reasonable probability that the requirement in rural South Gloucestershire might increase further, as it has already been identified to deliver more homes if necessary, and AK believes is capable of delivering much more than the 1,300 - 1,800 that is subject of the present distribution.<br><br>4) Critically AK considers that the SGLP should plan for the entirety of the 1,800 homes. There is no sense in not doing so. Responding to the issue now is vital in ensuing that the contingency 'pot' can respond at the earliest opportunity and when required to do so, not to have to wait for Local Plan Review which could take years. Given the issues surrounding the delivery of many of the Strategic Development Locations (SDLs) AK considers that there is little doubt that the contingencies will be required during the Plan Period. The opportunity to increase the supply of housing should be taken now, albeit AK is not resistant to a cascade arrangement whereby the sites that form part of the 500 homes contingency can be identified as such and necessary (but flexible) restrictions be enshrined in Policy.<br><br>5) For the reasons set out below AK supports Option 3, which is to identify non-strategic growth both Inside and Outside of the Green Belt. In addition to the commentary above regarding the specific JSP contingency AK further considers that this LP process should identify sites to be safeguarded from the Green Belt for future housing delivery. This complies entirely with Paragraph 85 of the National Planning Policy Framework (NPPF) and in particular the requirements that state:<br><br>o Where necessary, identify in their Plan's areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the Plan Period;<br><br>o Make clear that the safeguarded land is not allocated for development at the present time. Planning Permission for the permanent development of safeguarded land should only be granted following a Local Plan Review which proposes the development;<br><br>o Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development Plan Period.<br><br>6) Given the context for Green Belt release now, both in terms of new Strategic Development Locations (SDLs) and non-strategic locations, there can be little doubt that further Green Belt releases will be required in any LP Review. The urban living opportunity is a finite source of supply and there are few remaining sustainable locations for growth outside of the Green Belt to deal with the inevitable continuous pressure to accommodate the needs of the sub-region and South Gloucestershire at the end of the Plan Period. In order to maintain permanence of the Green Belt, the matter of safeguarding needs to be addressed now.<br><br>7) If areas of Green Belt are reviewed, assessed and included for such safeguarding at this time, it would result in proactive Planning and may |

| | |
|---|---|
| | avoid another Green Belt Review in the short to medium term with appropriate phasing restrictions being able to be applied through Policy. Accordingly it is important for South Gloucestershire Council over the coming Months to identify further contingency site possibilities exceeding the identified 500 unit target to ensure that effective long term housing delivery is achievable and that the Plan remains in accordance with the NPPF, specifically its Green Belt and Local Plan's Plan making Policies.<br><br>8) It is acknowledged that the Government attaches great importance to the Green Belt and when reviewing Green Belt boundaries, Local Planning Authorities should take account of the need to promote sustainable patterns of development, considering the consequences for sustainable development of channelling development towards urban areas as well as villages and towns within the Green Belt.<br><br>9) AK welcomes the Council's acknowledgement in the Draft Plan that a significant proportion (61%) of South Gloucestershire is covered by the Bristol and Bath Green Belt. Whilst a key aim of the Planning System is to protect areas of Green Belt which serve a useful purpose, given the scale of housing delivery required over the next 20 years, for the reasons set out below it is realistic to expect that some of this housing will have to be accommodated in areas currently identified as Green Belt. This has already been ably demonstrated through the JSP that identifies there are no further locations capable of delivering strategic growth; Coalpit Heath and Yate SDLs are both located in the Green Belt and the Plan envisages a capacity of 3,800 homes being located here. For the reasons set out below AK considers the same contention can be applied to non-strategic growth in South Gloucestershire.<br><br>10) Alder King consider that Option 1, looking only at areas outside the Green Belt would present real difficulty in ensuring delivery of the new housing is identified in sustainable locations. Some of the locations have already been subject to and/or identified for levels of growth appropriate for the size of the settlement such as Failand and Chipping Sodbury, whilst others simply do not have the services to support anything more than minor growth regardless of their Green Belt status such as Hawkesbury Upton and Marshfield. Growth in locations such as these will only exacerbate travel by car and the scale of growth proportionate to the size of the village would be insufficient to make significant improvements to Public Transport services.<br><br>11) Taking the list of 9 places outside the Green Belt identified as appropriate for investigation in Option 1, whilst an average 20% growth of each of these locations could just about (on paper) deliver the required 1,300 homes, a number of these locations could not be realistically considered feasible for such growth and certainly not all of the contingency sites would be catered for. Villages such as Rangeworthy, Cromhall and Old Sodbury are in some cases little more than ribbon development with limited services and almost half of these are located within and constrained by the Cotwolds AONB. While it is agreed that some development in these locations could assist in supporting the longevity of local rural services, it is not the case that all these locations should take 20% extra growth in order to meet the housing figures required. In any event, it would not meet the actual requirement of 1,800 homes.<br><br>12) Turning to more established rural areas that could be considered more feasible in the list of 9 in Option 1, when additional growth of these locations is reviewed in conjunction with in addition to existing allocated/Permitted Development including that in the JSP, it is fair to say that a number of these have already been allocated a proportionate level of growth during the existing Plan Period. Failand and Engine Common are good examples; extra growth here would represent a disproportionate amount of new development for that locality.<br><br>13) In respect of Chipping Sodbury, the settlement has been identified as a contingency site for strategic growth of 1,500 houses in the Draft JSP. It is highly likely that this will come forward over the Plan Period and whilst Chipping Sodbury is an established area and capable of sustainable growth, to allocate more sites of any significance at Chipping Sodbury for non-strategic growth would likely result in over-development of the location, especially when read with the recent and future allocations intended for the adjoining area of Yate. Allocation of non-strategic sites should complement the strategic growth in the JSP and should result in proportionate and balanced development of villages. To add further development to Chipping Sodbury, however apparently sustainable a place it appears in isolation, would not be appropriate.<br><br>14) In light of the contingency allocation of 1,500 homes at Chipping Sodbury, and AK's contention that there is a high possibility of this site being required to deliver in the next 20 years, it is considered that Chipping Sodbury should be removed entirely from the list of 35 rural places for investigation for non-strategic growth and instead be indicated as a (contingency) SDL settlement. Chipping Sodbury should be elevated to the same status as Yate, Thornbury, Coalpit Heath, Charfield and Buckover.<br><br>15) AK considers that there are exceptional circumstances for reviewing Green Belt boundaries and areas for development allocation inside the Green Belt boundary in this context of delivery of sustainable growth in rural South Gloucestershire. As such it is recommended that Option 3, reviewing areas within the Green Belt as well as outside the Green Belt is the best option to achieve the most appropriate form of sustainable growth. Indeed, the proximity of the Green Belt to major urban areas makes it inherently more sustainable to build in, in terms of supporting further investment in Public Transport and minimising the use of, and distances travelled by, the private car.<br><br>16) Some locations identified within the Green Belt are inherently sustainable and capable of delivering non-strategic growth. Equally there are potentially sound locations in the Green Belt that are unfeasible to accommodate growth due to the physical constraints of their surroundings and topography.<br><br>17) Alveston for example has been identified as a place in the Green Belt to be investigated for housing growth and was reviewed as such as part of the JSP. Alveston could well be considered a sustainable location well placed for transport links and access to community facilities. Nevertheless, the JSP Evidence Base1 for the settlement demonstrates Spatial constraints preventing it from significant growth. For example to the North East, and South West the Green Belt provides an important function separating it from Thornbury and Rudgeway, preventing urban sprawl and the coalescence of these villages. It also has a number of landscape, ecology and heritage constraints in proximity to the Golf Club to the North, and built form including the defensible boundary of the A38 running NE - SW effectively preventing non-strategic development potential to the East. Having been assessed historically and recently, there have been no allocations for some time at Alveston despite its sustainability credentials; and it is difficult to see where it could feasibly grow in a way that would not undermine core Planning principles.<br><br>1 Assessment of Strategic Development Locations Beyond Settlement Boundaries - Location Dashboards (November 2016). |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Reginald Pearce |
| **Comment ID** | 19740929/1485 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | 1) The SGLP identifies that 1,300 new homes are required with a potential contingency of 500 dwellings on individual non-strategic sites. Whilst Alder King (AK) has submitted Representations to the JSP contending that the identified overall housing need figure is insufficient to meet the |

| | |
|---|---|
| | needs of the West of England, the general intention to provide additional housing for non-strategic growth in line with the JSP is supported. Clearly the SGLP will need to respond to any changes in the quantum and distribution of development should the JSP be subject to modification.<br><br>2) It is interesting to reflect on the fact that in the JSP there are three contingency options for accommodating any shortfall in delivery, at Clevedon, Chipping Sodbury and via the additional 500 homes in 'rural' South Gloucestershire. In the event that the JSP numbers increase then there is a reasonable probability that the requirement in rural South Gloucestershire might increase further, as it has already been identified to deliver more homes if necessary, and AK believes is capable of delivering much more than the 1,300 - 1,800 that is subject of the present distribution. Therefore, we believe our site is a perfect candidate for absorbing any of the shortfall at the Thornbury or even Buckover SDLs before contingency is explored in the 'rural' South Gloucestershire locations.<br><br>3) Critically and in light of instances in shortfall of delivery, AK considers that the SGLP should plan for the entirety of the 1,800 homes. There is no sense in not doing so. Responding to the issue now is vital in ensuring that the contingency 'pot' can respond at the earliest opportunity and when required to do so, not to have to wait for LP Review which could take years. Given the issues surrounding the delivery of many of the SDLs AK considers that there is little doubt that the contingencies will be required during the Plan Period. The opportunity to increase the supply of housing should be taken now, albeit AK is not resistant to a cascade arrangement whereby the sites that form part of the 500 homes contingency can be identified as such and necessary (but flexible) restrictions be enshrined in Policy.<br><br>4) The site is located just outside Thornbury which scores comparatively well in terms of sustainability within the Council's Sustainability Appraisal when compared to other locations identified for higher levels of growth in SGC such as Buckover and Charfield. Therefore, as a site on the edge of Thornbury, the land would have excellent access to key services and facilities because close to Thornbury which is one of the three non-Green Belt settlements ranking in Tier 1.<br><br>5) Furthermore, Thornbury has been identified as an area for strategic transport investment which includes the extension of the MetroBus, a strategic cycle route and improved Junctions on the M5 Motorway. It is therefore important that in addition to the SDL at Thornbury, any contingency development is also directed to this area so in order to be proportionate to the level of investment required to viably and successfully deliver new and improved transport infrastructure that will significantly benefit both existing and future residents.<br><br>6) The land does not appear to be the subject of any landscape or ecological designations but this would be tested as part of any future Planning Application. The land is available, developable and deliverable. The land owner has the ability to start work on the site immediately subject to receiving Planning Permission. Accordingly, this site should be supported for a non-strategic growth housing allocation in the Local Plan.<br><br>7) The land put forward as part of this Representation is strategically close to Thornbury with the necessary links to enhance and support Thornbury as a town. Further land to support Thornbury as an SDL will help it to continue as a thriving Market Town, and its ability to grow economically. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Caroline White |
| **Comment ID** | 17228929/1498 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | It is difficult to choose an option without more knowledge of Green Belt throughout South Glos. My knowledge of local Green Belt would indicate that there should be no development within the Green Belt in Hanham Abbots. All Green Belt within the area meets the aims of the Green Belt and falls within the Avon Valley, as described below in the South Glos Character Assessment.<br><br>*'The Avon Valley character area is a distinctive and quite simple rural landscape, with limited visual encroachment except along its fringes.'*<br><br>*'Any further significant physical or visual encroachment of the urban edge has the potential to erode the character of the rural landscape.'* |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Jeremy White |
| **Comment ID** | 19936257/1505 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | It is my view that development should only be outside of the designated Green Belt area. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Berni O'Mahony |
| **Comment ID** | 10194497/1531 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Question 3.2:<br><br>Option 1 Outside the Green Belt (See P. 61). |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | The Engine Common Trustees (ECT) |
| **Comment ID** | 19741409/1561 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 3 is considered the most appropriate basis for the investigation of sites for NSG. To exclude any opportunities by the selection of the other two options will be simply an arbitrary judgment rather than a rounded and balanced one. There are difficult decisions to be made and as made clear in this Document a new approach is being taken, especially to the rural areas. If this is to be achieved, then the investigation of NSG needs to be contemplated in its widest possible context and choice. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | M. S. Howes |
| **Comment ID** | 19741377/1572 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 3 is considered the most appropriate basis for the investigation of sites for NSG. To exclude any opportunities by the selection of the other two options will be simply an arbitrary judgment rather than a rounded and balanced one. There are difficult decisions to be made and as made clear in this Document a new approach is being taken, especially to the rural areas. If this is to be achieved, then the investigation of NSG needs to be contemplated in its widest possible context and choice. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Rockfield Farms Limited (RFL) |
| **Comment ID** | 20069217/1586 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 3 is considered the most appropriate basis for the investigation of sites for NSG. To exclude any opportunities by the selection of the other two options will be simply an arbitrary judgment rather than a rounded and balanced one. There are difficult decisions to be made and as made clear in this Document a new approach is being taken, especially to the rural areas. If this is to be achieved, then the investigation of NSG needs to be contemplated in its widest possible context and choice. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Downend Estates Limited (DEL) |
| **Comment ID** | 1463137/1597 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 3 is considered the most appropriate basis for the investigation of sites for NSG. To exclude any opportunities by the selection of the other two options will be simply an arbitrary judgment rather than a rounded and balanced one. There are difficult decisions to be made and as made clear in this Document a new approach is being taken, especially to the rural areas. If this is to be achieved, then the investigation of NSG needs to be contemplated in its widest possible context and choice. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hannah Saunders - Dodington Parish Council |
| **Comment ID** | 19931969/1609 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **COMMENTS:**<br><br>3.2 Members would like to see Option 1 selected – the growth being outside of the Green Belt and when assessing these areas it should be ensured that there is adequate communications, community facilities and commercial/non-commercial activities…. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Taylor Wimpey |
| **Comment ID** | 20068353/1650 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **i. Option 1 (Outside the Green Belt):**<br><br>We are not in support of Option 1, which seeks to prioritise the safeguarding of the Green Belt in the District above the need to locate new development where future residents will have the opportunity to access facilities and services via sustainable modes of transportation. Although there are clearly some suitable and sustainable options to locate developments outside of the Green Belt it is not considered that all non-Green Belt sites should be prioritised over some more sustainably located sites within the Green Belt.<br><br>**ii. Option 2 (Inside the Green Belt):** |

| | |
|---|---|
| | Option 2 is also not our preferred option, it seeks to locate all non-strategic growth within the Green Belt. It is not considered that this approach alone is a credible method of ensuring sufficient dwellings to meet the level of growth in Non-Strategic Locations can be identified. Furthermore, there may be a cumulative impact of directing all this growth to sites within the Green Belt on the purposes of land within this designation to the extent that this may risk fragmenting the Green Belt and undermining the overall purpose of the designation.<br><br>**iii. Option 3 (Both Inside & Outside the Green Belt):**<br><br>Option 3 is our preferred approach as this option results in the largest range of alternative places and potential sites for growth. A wide range of housing options will be required to ensure that the full OAHN for the District can be accommodated at sustainable sites that are capable of delivering within the Plan Period.<br><br>Taylor Wimpey's site at Mangotsfield only remains within the Green Belt due to a historic designation that does not reflect the current built form. In our view, the site does not fully contribute to meeting any of the Green Belt objectives, which are set out within the National Planning Policy Framework (Paragraph 80) as follows:<br><br>o To check the unrestricted sprawl of large built-up areas;<br><br>o To prevent neighbouring towns merging into one another;<br><br>o To assist in safeguarding the countryside from encroachment;<br><br>o To preserve the setting and special character of historic towns; and<br><br>o To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.<br><br>The Joint Spatial Plan Green Belt Assessment, November 2015, considered a parcel of Green Belt which included the site Taylor Wimpey have interests in, along with the sports pitches immediately to the East. This Document describes the site as '27, West of Ring Road/South East Mangotsfield' and suggests that the site meets Purposes 1 and 5 of the Green Belt, namely to prevent urban sprawl and to assist urban regeneration. The Stage 2 JSP Green Belt Assessment (dated November 2016) did not consider Parcel 27, it is understood that this is due to the parameters of that exercise (to support the Emerging JSP) defining the parcels of land being looked at as those capable of accommodating Strategic Development Locations (500 units plus) for the JSP (as set out at Paragraph 2.5 of the Stage 2 Review).<br><br>It is not clear whether South Gloucestershire Council have undertaken any further assessment of Green Belt parcels within the District to date to inform the suggested Spatial Strategy options included within the current Draft version of the new Local Plan. As set out throughout these Representations, it is our view that both Green Belt and Non-Green Belt sites will be required to be identified within the District in order to deliver the level of non-strategic growth that will need to be planned for. It is also our view, that there are highly sustainable sites suitable for residential development of less than 500 units that lie within the Green Belt and should be released for development, including the Land at Mangotsfield controlled by Taylor Wimpey. We request that the Council considerers positively further Green Belt release through the new Local Plan, and that any site assessment process to inform this is based on a robust Methodology.<br><br>Appendix 3 to the new Local Plan Consultation Document specifically acknowledges that such an assessment may be necessary, stating '… *It may be necessary for further detailed Green Belt assessment of places within or adjoining the Green Belt. This will assess at a more local level the value and potential impact from development on smaller parcels of Green Belt land within and surrounding rural places.'*<br><br>Paragraph 13 accompanying Policy 2 of the Publication Version of the JSP acknowledges that, in addition to the release of Green Belt land through the JSP itself subsequent Local Plan preparation will provide the mechanism to amend local Green Belt boundaries further to accommodate growth where necessary. National Policy also indicates that the Local Plan process is an appropriate opportunity to review Green Belt boundaries with Paragraph 83 of the NPPF stating that preparation or review of a Local Plan constitutes 'exceptional circumstances' when alterations to Green Belt boundaries can be made. The Emerging new Local Plan is therefore an entirely appropriate mechanism for the release of our Client's site at Mangotsfield from the Green Belt.<br><br>As mentioned above, previous assessments of the parcel of Green Belt within which Taylor Wimpey's site lies have considered the parcel meets two of the 5 Green Belt Purposes. In our view, this site does not contribute to these Purposes. Firstly, the site lies within the A4174 Ring Road, and is set back from this by land currently in use for playing pitches, this road forms the de facto barrier to development spreading East from Bristol in the Staple Hill area, the undeveloped land within the Ring Road could more accurately be seen as infill between the existing built form and the road rather than sprawl outwards into the countryside.<br><br>Secondly with regard to assisting urban regeneration, as set out above, we have serious concerns regarding the level of housing that needs to be accommodated within the Plan Period and the assumption that existing urban areas will be able to accommodate a significant proportion of this. It is clear that the development needs of the District cannot be met on Brownfield sites alone, and that there is a demonstrable need to accommodate Green Field development. Given there is no current public access to the site, the site is in good proximity to a District Centre and the site is not an intrusion into the countryside by virtue of the A4174 to the West we do not consider that the retention of this site, undeveloped, and within the Green Belt is assisting in the regeneration of Brownfield or derelict urban land. Furthermore, although the site is undeveloped, it is surrounded by development and we consider that the efficient use of this site for residential units could be seen as infill within what is logically the existing de facto Settlement Boundary of the A4174. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | E. H. Schubert Will Trust |
| **Comment ID** | 12403425/1672 |

| | |
|---|---|
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 3, considering sites both in and out of the Green Belt, is the preferable option for non-strategic growth. Sites outside the Green Belt are obviously preferable to those within, but there will be small infill sites within the Green Belt which are sustainable and could accommodate new homes. The Council would be severely limiting its ability to meet its housing delivery target if it restricted its non-strategic growth option to either Option 1 or 2. Option 3 should therefore be pursued.<br><br>It is essential that Settlement Boundaries are reviewed fully to ensure that all settlements capable of accommodating sustainable development are considered. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Frampton Cotterell Parish Council |
| **Comment ID** | 20175105/1692 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Frampton Parish Council favours Option 3 (both Inside and Outside the Green Belt). **HOWEVER** the majority of development should be on Brownfield land. Any development in the Green Belt should be minor – a minor development is a maximum of 10 properties. Council ask that it be made clear that we would Approve limited development in the Green Belt. Green Belt is needed to protect the communities. The Council is of the opinion that Woodlands Farm should form part of the Green Belt.<br><br>Option 1 - Building only on Brownfield sites is ideal but not likely to succeed as an option because it is unlikely that sufficient acreage for the designated number of houses could be identified.<br><br>Option 2 - We believe that building totally on Green Belt is not acceptable on any level.<br><br>Option 3 - A mixture of both Green and Brownfield sites would seem to be the only viable option if the number of houses currently being proposed are to be built.<br><br>Frampton Parish Council believes that any building in these areas is unlikely to address in any meaningful way the larger problem of homelessness. Houses generally built by developers in Frampton Cotterell are still out of reach of many. 'Affordable' Housing offered by developers is still out of the reach of the majority of First Time Buyers. There is a real need to look at truly Affordable Housing for people on lower incomes and/or just trying to access the housing market. Ideally, new homes should be protected in some way so that they are not bought as buy to let or to be developed into a much grander home which then becomes unaffordable.<br><br>Some thought should also be given to provision of accommodation for older residents who currently live in larger family homes and would like to downsize within the village. As there is very little provision for this a shortage of family homes has arisen driving up house costs even further.<br><br>There is concern that the style of houses being built do not reflect the local character of the area and certainly do not have any regard for our village design statements.<br><br>Small developments within the village are preferable to larger Estates, which, of course, the developers prefer because there is an economy in larger scale. We would favour a Strategy of using local developers to design and build more sympathetically and as much as possible on Brownfield sites.<br><br>Frampton Cotterell is already struggling with volumes of traffic and building on a larger scale would add to these difficulties. It has been discussed that the Winterbourne/Frampton Cotterell Bypass is once again being considered by South Gloucestershire Council and this may ultimately alleviate some of this problem but would not be a solution in the short term. Inconsiderate parking in many roads adds to problems particularly with buses unable to negotiate streets narrowed by double rows of parked cars. Any new development will further exacerbate these difficulties and of course traffic increases also result in higher levels of pollution.<br><br>Because of the general lack of employment and facilities it will be necessary for residents to travel from the village not only adding to the traffic problems but also contributing to the dormitory effect within Frampton Cotterell. Consequent on this is loneliness and isolation particularly of young mums and the elderly.<br><br>Amenity would be affected if there is further large-scale building. Birds, particularly, are disrupted by building activity - it was only in 2017 that buzzards returned to Woodlands Farm. Shyer birds such as jays and green woodpeckers are still not as plentiful as they were.<br><br>Schools within Frampton Cotterell are at capacity and although the new School is planned it will not provide a huge increase in available places.<br><br>The Doctor's Surgery feels it could cope as they have more building land that could be utilised, but any increase would involve a great deal of planning as GP shortages are a very real problem. |

| | |
|---|---|
| | The whole area was mined extensively in the past and as many of the early ones were small and privately owned there are big gaps in the knowledge about the whereabouts of underground systems. There have been problems all over the country (and indeed the world) caused by the appearance of sink holes on Housing Estates because not enough attention was given to this very real threat.<br><br>Although the flooding of the Frome has been addressed somewhat by the installation of new defences the more building on vulnerable areas the greater the risk of flooding. Allowing building along the Frome Valley would result in homes being repeatedly flooded with a blight caused by the inability to insure such properties. Added to this the greater the area covered by hard surfaces the greater the propensity for surface water flooding as rain water cannot easily drain away. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | G. E. Forward |
| **Comment ID** | 20176577/1710 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Option 1** (Outside the Green Belt):<br><br>A proper Survey of all Brownfield sites should be undertaken by SGC not developers.<br><br>**Option 2** (Inside the Green Belt):<br><br>This protected area is vital. Recreation, a natural lung for air pollution and a visual amenity for all.<br><br>**Option 3** (Both):<br><br>In my opinion a spurious question as building in the Green Belt is not an option. Somerset Council have vowed not to build on any Green Belt Land. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hazel Jones - Hawkesbury Parish Council |
| **Comment ID** | 16665185/1736 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Non-strategic Growth:**<br><br>The Parish supports Option 3 investigating areas Inside and Outside the Green Belt.<br><br>The Parish Council would like to see greater support for the Development of Neighbourhood Plans and Community Land Trusts. The former being a Technical Document outside the capabilities of many Parish Councils. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Eastwood Park Limited |
| **Comment ID** | 16634689/1750 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Question 3.2 - Approach to Rural Growth – Testing Options:**<br><br>As outlined in the Consultation dDcument, there are 3 options to non-strategic growth in the District which include: Rural Places Outside the Green Belt; Rural Places Inside the Green Belt; and Rural Places Both Inside and Outside the Green Belt.<br><br>It is right that all options should be fully considered. The Green Belt is a key constraint on housing locations but in itself should not be an automatic block to any new housing development given the need to significantly boost the supply of housing in the UK. Instead it should be included in the balance of constraints and opportunities.<br><br><u>Option 1 (Outside of the Green Belt):</u><br><br>Option 1 would distribute 1,300 new homes (and a potential additional 500 new homes contingency), on sites within and surrounding rural places that are outside of the Green Belt. The positives associated with this approach include protecting the integrity of the Green Belt and the fact that no SSSIs are located within or adjacent the sites. However, there are clear issues and constraints on this option stemming primarily from the consequences of excluding sites in the Green Belt, as this potentially overlooks appropriate and sustainable sites which are suitable for sustainable |

| | |
|---|---|
| | growth and which can support existing local services and faculties which in turn will enhance the sustainability of rural area. It is rather arbitrary to prevent any sites in the Green Belt without thorough investigation.<br><br>As such, although sites such as Falfield are appropriate and included in this option, the limited nature of where sites can be assessed could lead to other suitable sites not going forward. The Local Plan preparation process is the appropriate way to assess whether sites and land in the Green Belt should be reviewed or developed. This removes this opportunity without a strong valid reason.<br><br>Option 2 (Rural Places Inside the Green Belt):<br><br>Option 2 would distribute 1,300 new homes (and a potential additional 500 new homes contingency), on sites within and surrounding rural places inside the Green Belt. The sites put forward for this option are more numerous than Option 1 and some benefit from much better walking/cycling opportunities to facilities and services<br><br>The key issue with this approach however is that there is no valid reason why non-Green Belt sites should not be included in the non-strategic development approach for the Council. This actively removes sites which may be suitable in all regards aside from the fact that they are not located within the Green Belt. This would be a rather perverse reason for excluding sites and is not something which complies with the National Planning Policy Framework (NPPF). Paragraph 83 of the NPPF does allow for Green Belt boundaries to be altered, in exceptional circumstances, through the Plan making processes, however the other objectives of the NPPF still need to be considered and an arbitrary restriction on non-green Belt sites is unlikely to meet a test of reasonableness.<br><br>Option 3 (Both Inside and Outside the Green Belt):<br><br>Option 3 would distribute 1,300 new homes (and a potential additional 500 new homes contingency), on sites within and surrounding rural places both within and outside of the Green Belt. It has the highest number of sites and creates the opportunity to allocate a range of non-strategic sites across the District and allow a range of smaller site sizes.<br><br>This is the preferred option as it provides the most flexibility and opportunity for sustainable sites to come forward. Only the most sustainable locations and sites should be progressed. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Robert and Judith Stone |
| **Comment ID** | 19449089/1752 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Dear Sir/Madam,<br><br>I write concerning the house building in the Hanham Abbotts Green Belt and Conservation Area.<br><br>To build on these particular Green Spaces around us seems to be spoiling the area in which .<br><br>These proposed houses and their occupants will need servicing. Roads, Schools, Doctors (takes three weeks to get an appointment now) services, local Public Transport, leisure spaces (ironic) water and sewage etc.<br><br>The area to the rear of where we live, , is a genuine buffer zone and keeps the area open for the local access to Hencliffe Woods.<br><br>The area supports varied wildlife. It's also well used by walkers, dogs and children, all breathing unpolluted air.<br><br>Also, the road access is very narrow and is going to cause problems with access with very large vehicles, fire engines etc.<br><br>There was a Parish Survey in 2014, which concluded that the local Green Belt would be preserved.<br><br>Most articles that I read about extra housing notes the effects of traffic pollution on air quality and consequently on health generally. I myself and pollution is going to have a negative effect .<br><br>Also, the area behind , in the 1950's and 1960's was used as an uncontrolled refuse tip.<br><br>The ground was used for all kinds of industrial and domestic waste, plus dead animals and is only covered with a small layer of soil.<br><br>The Hanham District Green Belt Conservation Society is very much against the housing plan. |

| | |
|---|---|
| | Why has the empty Kleeneze site not been included in the Plans?<br><br>I really think your housing plans should be reconsidered rather than lose the many open spaces in Hanham. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Trevor Cloke and Cynthia Cloke |
| **Comment ID** | 20182401/1758 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Dear Sir/Madam,<br><br>I write concerning the house building in the Hanham Abbotts Green Belt and Conservation Area.<br><br>To build on these particular Green Spaces around us seems to be spoiling the area in which .<br><br>These proposed houses and their occupants will need servicing. Roads, Schools, Doctors (takes three weeks to get an appointment now) services, local Public Transport, leisure spaces (ironic) water and sewage etc.<br><br>The area to the rear of where we live, , is a genuine buffer zone and keeps the area open for the local access to Hencliffe Woods.<br><br>The area supports varied wildlife. It's also well used by walkers, dogs and children, all breathing unpolluted air.<br><br>Also, the road access is very narrow and is going to cause problems with access with very large vehicles, fire engines etc.<br><br>There was a Parish Survey in 2014, which concluded that the local Green Belt would be preserved.<br><br>Most articles that I read about extra housing notes the effects of traffic pollution on air quality and consequently on health generally. I myself and pollution is going to have a negative effect .<br><br>Also, the area behind , in the 1950's and 1960's was used as an uncontrolled refuse tip.<br><br>The ground was used for all kinds of industrial and domestic waste, plus dead animals and is only covered with a small layer of soil.<br><br>The Hanham District Green Belt Conservation Society is very much against the housing plan.<br><br>Why has the empty Kleeneze site not been included in the Plans?<br><br>I really think your housing plans should be reconsidered rather than lose the many open spaces in Hanham. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sylvia Wiltshire |
| **Comment ID** | 19883297/1760 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Dear Planning Committee,<br><br>I am writing to advise you of my dismay at the proposed plans for Hanham. I have lived on for years and as far as I can remember we have been fighting for the Hanham Hills all of this time. There has always been some builder wanting to make money with no care about the destruction of such lovely Green Belt.<br><br>Once the Green Belt has been destroyed there is no going back! |

| | |
|---|---|
| | The annoying thing is that there are plenty of Brownfield sites to be built on, but obviously the lovely green fields are so much easier to use, less trouble and lots more profit to be made.<br><br>As already proved that the number of houses needed for the future around this area have been greatly over estimated, I think the Committee needs to really think carefully about plans for the future and hopefully will realise there are so many alternative sites rather than our Green Belt. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Edwina Griffith |
| **Comment ID** | 12514497/1771 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Dear Sir/Madam,<br><br>Further to your email dated 6th March 2018, please find our Responses to your requests as below:<br><br>**2. South Gloucestershire Local Plan 2018 - 2036 Question 3.2. Views and comments on which option should be used to determine the places which will be subject to further more detailed investigation as a set of rural places which will form the Preferred Approach to Non-Strategic Growth:**<br><br>a. We support Option 3 Both Inside and Outside the Green Belt. We believe this will give the greatest balance and benefits as a result of offering the widest spread of sites of different sizes in different areas. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David Jonathan Redgewell - TSSA, Bus User UK, South West Transport Network |
| **Comment ID** | 20189249/1782 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | We would prefer Option 3 providing housing in all Villages especially Affordable Homes. With a Limited number of market Housing. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sydney Freed (Holdings) |
| **Comment ID** | 19730721/1787 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Growth outside of the main centres is characterised as 'Rural Growth' with three corresponding options being tested:<br><br>o Option 1 Outside the Green Belt;<br><br>o Option 2 Inside the Green Belt; and,<br><br>o Option 3 Both Inside and Outside the Green Belt.<br><br>SHF Land at Engine Common falls outside of the Green Belt, albeit the boundary follows Dyer's Lane which forms the Western edge of the land ownership. Whilst it is acknowledged that the locations identified under each of the above three options does not propose development on specific sites, it is noted that Engine Common falls within both Options 1 and 3.<br><br>We are supportive of this approach and advocate that the SFH Land at Engine Common, having been identified as a potential SDL, represents a logical extension to both the settlement itself and the Northern extent of Yate. This remains the case irrespective of whether the North Yate SDL proceeds. For the avoidance of doubt, this is the land West of the existing settlement up to the above referenced Green Belt boundary.<br><br>Whilst it is recognised that the SFH land has been the subject of previous Planning Applications, resulting in Refusal, this does not necessarily limit the ability to deliver a suitably designed scheme, which addresses the known constraints and, where required, mitigates for impacts. It is important to recognise that the role of the SGLP (together with the JSP) is to provide for future needs in a comprehensive manner and therefore recognising the development potential of Engine Common, and specifically the SFH landholding, is supportive of this principle whilst continuing to avoid development directly within the Green Belt. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hydrock Consultants Ltd and Mojo Active Ltd |
| **Comment ID** | 19740577/1790 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |

| | |
|---|---|
| **Comment** | Non-Strategic Development in the Rest of South Gloucestershire (Pages 54 – 71):<br><br>In general, we support the allocation of sites for non-strategic growth and support the investigation of sites within the Green Belt (i.e. Option 2 and Option 3) in terms of the approach to rural growth.<br><br>We are however concerned that the Local Plan focuses too greatly on housing and does not appear to be based on an Employment Strategy for rural employment sites. Whilst Strategic Employment Sites are assessed and reviewed through the Joint Spatial Plan, in line with the revised Draft NPPF, we believe that a local Employment Strategy for South Gloucestershire is required to understand the existing businesses in the District and to facilitate the growth of these businesses throughout the Plan Period.<br><br>We consider that this exercise should also include careful consideration of the impact of the Green Belt designation on such growth. Over Court Farm is an established employment site, having operated as an employment premises for over  years. There are now two businesses established in this location; Hydrock Consultants Ltd and Mojo Active Ltd. Both businesses contribute to the economic vitality of the District as set out below.<br><br>The West of England Strategic Economic Plan 2015 - 2030, of which South Gloucestershire Council is a key member, refers to growth and investment in five priority sectors, which have been identified and informed by evidence of employment and GVA values for each sector:<br><br>o Professional Services<br><br>o Creative and Digital Media<br><br>o Low Carbon<br><br>o High Tech Industries<br><br>o Advanced Engineering and Aerospace<br><br>Hydrock offer a range of services that contribute to the economic success of the professional service and engineering sectors in South Gloucestershire. Hydrock's offer extends to the following:<br><br>o Geo-environmental<br><br>o Geo-technical<br><br>o Flood Risk Assessment<br><br>o Land Remediation<br><br>o Ground Water Remediation<br><br>o Infrastructure<br><br>o Civil & Structural Engineering<br><br>o Mechanical & Electrical (Building Services)<br><br>o Transport Engineering<br><br>o Acoustics<br><br>o Nuclear Management Consultancy<br><br>It is evident therefore that Hydrock, as an employer of over  people in South Gloucestershire, clearly meets the strategic objectives of the South Gloucestershire Local Plan and West of England Strategic Economic Plan. The Hydrock business contributes to the strategic economic objectives within the West of England, as well as the rural economic objectives within the current Planning Policy Framework in the Policies Sites and Places Plan.<br><br>Mojo is a thriving local business that provides and encourages sport and recreation activities across a range of ages. Mojo is also active in the local community. Mojo welcomes around  participating local Schools and has voluntarily set up a local School Running Club, which has now been running for over  years. There are regularly  attending with many having gained confidence to join local Running Clubs. In addition, Mojo offers skills-building activities and learning opportunities. In turn, this promotes and contributes to the key objectives of the South Gloucestershire Sustainable Community Strategy 2016 through:<br><br>o Supporting local business growth<br><br>o Contributing to School education |

| | |
|---|---|
| | o Encouraging participation of young people<br><br>o Promoting community cohesion<br><br>o Building a stronger community and voluntary sector<br><br>o Encouraging healthy lifestyles<br><br>o The growth of both businesses is currently restricted by the Green Belt designation, which inhibits intensification and improvement of the existing premises and restricts the ability of each business to provide the employment space and facilities to create a productive working environment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mr. Michael Savory and Mr. Miles Savory |
| **Comment ID** | 19721665/1797 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Rackham Planning agrees with the general hierarchal principle of locating new housing firstly, in and around Town Centres on previously developed (Brownfield) land, secondly on Greenfield sites in and around Town Centres, thirdly on Greenfield/Brownfield sites on the edges of sustainable settlements not in the Green Belt and finally on sites on the edges of sustainable settlements within the Green Belt. However, the reality is that in South Gloucestershire the Green Belt is approximately 23,000 hectares and covers open land and countryside as well as a number of settlements "washed over" by the Green Belt. The total coverage within the District is approximately 61% and therefore it is considered in order to "significantly boost" housing supply in accordance with Paragraph 47 of the NPPF it is inevitable that some development in the Green Belt will need to take place, particularly in regard to sustainable rural settlements. Rackham Planning therefore considers that South Gloucestershire Council should investigate sites both Inside and Outside the Green Belt.<br><br>The JSP identified a requirement for 1,300 new homes plus a contingency of 500 new homes from non-strategic development sites across the region. This should be considered as a true minimum; the Council are in a position to allocate sites for more than their allocated requirement if they so wish. Indeed, we consider it would be prudent of them to do so given the problems experienced in maintaining a 5 year housing land supply in the current Plan Period. It does not make sense for rural communities in the Green Belt to be left behind those located outside of it. Due to the location of the Green Belt in South Gloucestershire adjacent to the Bristol North and East Fringes it is a reality that many of the rural settlements located within the designation have better access to services and facilities than settlements outside the Green Belt to the North.<br><br>We believe that exceptional circumstances exist, as required by Paragraph 83 of the NPPF, to justify the release of sites in the Green Belt for non-strategic growth. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mark Skuse |
| **Comment ID** | 19740097/1832 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Rackham Planning agrees with the general hierarchal principle of locating new housing firstly, in and around Town Centres on previously developed (Brownfield) land, secondly on Greenfield sites in and around Town Centres, thirdly on Greenfield/Brownfield sites on the edges of sustainable settlements not in the Green Belt and finally on sites on the edges of sustainable settlements within the Green Belt. However, the reality is that in South Gloucestershire the Green Belt is approximately 23,000 hectares and covers open land and countryside as well as a number of settlements "washed over" by the Green Belt. The total coverage within the District is approximately 61% and therefore it is considered in order to "significantly boost" housing supply in accordance with Paragraph 47 of the NPPF it is inevitable that some development in the Green Belt will need to take place, particularly in regard to sustainable rural settlements. Rackham Planning therefore considers that South Gloucestershire Council should investigate sites both Inside and Outside the Green Belt.<br><br>The JSP identified a requirement for 1,300 new homes plus a contingency of 500 new homes from non-strategic development sites across the region. This should be considered as a true minimum; the Council are in a position to allocate sites for more than their allocated requirement if they so wish. Indeed, we consider it would be prudent of them to do so given the problems experienced in maintaining a 5 year housing land supply in the current Plan Period. It does not make sense for rural communities in the Green Belt to be left behind those located outside of it. Due to the location of the Green Belt in South Gloucestershire adjacent to the Bristol North Fringe it is a reality that many of the rural settlements located within the designation have better access to services and facilities than settlements outside the Green Belt to the North.<br><br>We believe that exceptional circumstances exist, as required by Paragraph 83 of the NPPF, to justify the release of sites in the Green Belt for non-strategic growth. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Martyn Lewis |
| **Comment ID** | 19721729/1855 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |

| | |
|---|---|
| **Comment** | Rackham Planning agrees with the general hierarchal principle of locating new housing firstly, in and around Town Centres on previously developed (Brownfield) land, secondly on Greenfield sites in and around Town Centres, thirdly on Greenfield/Brownfield sites on the edges of sustainable settlements not in the Green Belt and finally on sites on the edges of sustainable settlements within the Green Belt. However, the reality is that in South Gloucestershire the Green Belt is approximately 23,000 hectares and covers open land and countryside as well as a number of settlements "washed over" by the Green Belt. The total coverage within the District is approximately 61% and therefore it is considered in order to “significantly boost” housing supply in accordance with Paragraph 47 of the NPPF it is inevitable that some development in the Green Belt will need to take place, particularly in regard to sustainable rural settlements. Rackham Planning therefore considers that South Gloucestershire Council should investigate sites both Inside and Outside the Green Belt.<br><br>The JSP identified a requirement for 1,300 new homes plus a contingency of 500 new homes from non-strategic development sites across the region. This should be considered as a true minimum; the Council are in a position to allocate sites for more than their allocated requirement if they so wish. Indeed, we consider it would be prudent of them to do so given the problems experienced in maintaining a 5 year housing land supply in the current Plan Period. It does not make sense for rural communities in the Green Belt to be left behind those located outside of it. Due to the location of the Green Belt in South Gloucestershire adjacent to the Bristol North Fringe it is a reality that many of the rural settlements located within the designation have better access to services and facilities than settlements outside the Green Belt to the North.<br><br>We believe that exceptional circumstances exist, as required by Paragraph 83 of the NPPF, to justify the release of sites in the Green Belt for non-strategic growth. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Colin Maidment - Wickwar Parish Council |
| **Comment ID** | 19837025/1859 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Recommended Option: **Non-strategic Growth Inside the Green Belt.**<br><br>The recommendation is based on a review of the South Gloucestershire Local Plan Consultation Document and the South Gloucestershire Council non-strategic event which took place on 22nd February 2018.<br><br>With regard to the non-strategic Growth areas options being proposed, there is an understanding that a cohesive Policy is required to stop the plethora of speculative development proposals which are inappropriate, both for the communities concerned and for not providing the appropriate supporting infrastructure. There is also an understanding that Affordable Housing is required over the coming years in the region of 1,300 new homes in the non-strategic growth areas.<br><br>The rationale for recommending the non-strategic growth should be inside the Green Belt is based on the following benefits provided by this option:<br><br>o The infrastructure that the Green Belt has already such as good Public Transport facilities and with low travelling distances to areas of high employment resulting in less environmental impact.<br><br>o The road infrastructures are in place to take the increase volume of traffic that the future development would create.<br><br>o Other public amenities such as Libraries, parks and public walking routes are in place along with available School places.<br><br>o Health services such as Hospitals, Doctors, and Dentists are available locally and within short travelling distance. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mr. Peter Maggs & Mrs. Jeanne Maggs |
| **Comment ID** | 19721825/1865 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Rackham Planning agrees with the general hierarchal principle of locating new housing firstly, in and around Town Centres on previously developed (Brownfield) land, secondly on Greenfield sites in and around Town Centres, thirdly on Greenfield/Brownfield sites on the edges of sustainable settlements not in the Green Belt and finally on sites on the edges of sustainable settlements within the Green Belt. However, the reality is that in South Gloucestershire the Green Belt is approximately 23,000 hectares and covers open land and countryside as well as a number of settlements "washed over" by the Green Belt. The total coverage within the District is approximately 61% and therefore it is considered in order to “significantly boost” housing supply in accordance with Paragraph 47 of the NPPF it is inevitable that some development in the Green Belt will need to take place, particularly in regard to sustainable rural settlements. Rackham Planning therefore considers that South Gloucestershire Council should investigate sites both Inside and Outside the Green Belt.<br><br>The JSP identified a requirement for 1,300 new homes plus a contingency of 500 new homes from non-strategic development sites across the region. This should be considered as a true minimum; the Council are in a position to allocate sites for more than their allocated requirement if they so wish. Indeed, we consider it would be prudent of them to do so given the problems experienced in maintaining a 5 year housing land supply in the current Plan Period. It does not make sense for rural communities in the Green Belt to be left behind those located outside of it. Due to the |

| | |
|---|---|
| | location of the Green Belt in South Gloucestershire adjacent to the Bristol North Fringe it is a reality that many of the rural settlements located within the designation have better access to services and facilities than settlements outside the Green Belt to the North.<br><br>We believe that exceptional circumstances exist, as required by Paragraph 83 of the NPPF, to justify the release of sites in the Green Belt for non-strategic growth. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Andrew Harvey - Harvey Shopfitters Ltd |
| **Comment ID** | 16665505/1871 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Rackham Planning agrees with the general hierarchal principle of locating new housing firstly, in and around Town Centres on previously developed (Brownfield) land, secondly on Greenfield sites in and around Town Centres, thirdly on Greenfield/Brownfield sites on the edges of sustainable settlements not in the Green Belt and finally on sites on the edges of sustainable settlements within the Green Belt. However, the reality is that in South Gloucestershire the Green Belt is approximately 23,000 hectares and covers open land and countryside as well as a number of settlements "washed over" by the Green Belt. The total coverage within the District is approximately 61% and therefore it is considered in order to "significantly boost" housing supply in accordance with Paragraph 47 of the NPPF it is inevitable that some development in the Green Belt will need to take place, particularly in regard to sustainable rural settlements and the urban edges. Rackham Planning therefore considers that South Gloucestershire Council should investigate sites both Inside and Outside the Green Belt.<br><br>The JSP identified a requirement for 1,300 new homes plus a contingency of 500 new homes from non-strategic development sites across the region. This should be considered as a true minimum; the Council are in a position to allocate sites for more than their allocated requirement if they so wish. Indeed, we consider it would be prudent of them to do so given the problems experienced in maintaining a 5 year housing land supply in the current Plan Period. It does not make sense for rural communities in the Green Belt, including on urban edges, to be left behind those located outside of it. Due to the location of the Green Belt in South Gloucestershire adjacent to the Bristol North and East Fringes it is a reality that many sites located within the designation on urban edges have better access to services and facilities than settlements outside the Green Belt to the North.<br><br>We believe that exceptional circumstances exist, as required by Paragraph 83 of the NPPF, to justify the release of sites in the Green Belt for non-strategic growth. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mr. and Mrs. Drew and Mrs. S. M. Bennett |
| **Comment ID** | 19722081/1885 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 1 is clearly the favoured option in terms of achieving sustainable new development that does not diminish in any way the integrity of the Green Belt for South Gloucestershire. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tony England |
| **Comment ID** | 20208833/1907 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Please see Representations Document enclosed. |
| **Attached documents** | Tony England - Barton Willmore.pdf (12.5 MB) |

| | |
|---|---|
| **Respondent Name** | H2 Development Management (Land to Rear of Mount Pleasant Farm, Longwell Green) |
| **Comment ID** | 20377281/1963 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | *Question 3.2: Options for Non-strategic Growth:*<br><br>4.9 Finding sites which are well related to the Bristol urban area is critical in helping meet the city's housing needs, and the Emerging Spatial Strategy of the South Gloucestershire LP is crucial in ensuring this is achieved.<br><br>4.10 It is critical to note that, following an assessment of the reasonable alternatives the four Unitary Authorities have acknowledged that there are exceptional circumstances to justify the release of Green Belt land. The Council must now find additional sites to incorporate the housing needs arising from both Bristol and its own District, with Green Belt sites being an inevitable consideration.<br><br>4.11 As is discussed in further detail below, the four Unitary Authorities have also agreed that locations *"within or well-related to the Bristol urban area"* must contribute towards addressing the Affordable Housing need of Bristol as well as their own local need.<br><br>4.12 It is important to consider the findings of the SA which assess each respective option against the Council's Sustainability Objectives. The |

| | |
|---|---|
| | results of the SA suggest that the identification of locations outside of the Bristol and Bath Green Belt are an inappropriate Strategy in which to pursue future development options across the Local Authority, thus discounting Option 1.<br><br>4.13 The indicative locations presented through Option 1 do not effectively meet the Sustainability Objectives as well as those of Options 2 and 3, for example the access to healthcare, employment, education, community and recreational facilities do not score as high in Option 1 compared to the other alternatives. In addition, this option does not have the capacity to deliver a large quantum of high quality non-strategic housing where the need most arises.<br><br>4.14 Moreover, it is considered that Option 1 – and to an extent Option 3 – are simply presented purely to ensure optimum protection of the Bristol and Bath Green Belt. However, the four Authorities have acknowledged that the Green Belt will need to play a part in meeting identified market and Affordable Housing need.<br><br>4.15 On this basis, it is considered that Option 2 is the most appropriate Strategy for non-strategic growth. Under this option, new development will be located where the majority of housing need most arises. In addition, there is significantly better access to services and facilities. As noted above the site at Longwell Green is located to a range of local amenities within walking distance.<br><br>4.16 Under Option 2 there is a reduced need to provide essential large-scale infrastructure compared to the dispersal approaches under Options 1 and 3, which would simply not present a feasible alternative. When compared with the other options for non-strategic growth, Option 2 provides a greater opportunity for encouraging more sustainable transport choices. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | JFG Gunnery |
| **Comment ID** | 19741793/1974 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Option 3 should be applied in the identification of alternative sites for development. Settlements within the Green Belt should be assessed for capacity to receive additional development by virtue of its location to services and its ability to contribute positively to sustaining and enhancing rural services and facilities. The Emerging Local Plan must take a positive stand in supporting rural growth and development. Too much emphasis can be placed upon the sprawl of towns and cities that Green Belt Policy at the expense of sustaining and enhancing villages and other settlements within Green Belt.<br><br>It is noted at Appendix 3 of the SGLP Consultation that SGC will consider whether detailed Green Belt Assessments are necessary to assess places in or adjoining Green Belt. This is welcomed – however, the robustness of the Stage 1 and Stage 2 Green Belt Assessments for the JCS must be tested first and done so based upon a Strategy which allows small scale development to be achieved. Any further local Green Belt Assessment work should be founded on sound evidence and helpful Policies derived from that to deliver an acceptable level of new development. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Group West |
| **Comment ID** | 19927585/2020 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Non-Strategic Development in the Rest of South Gloucestershire:**<br><br>4.42. It is recognised that the settlement of Westerleigh is already identified as a location for Non-Strategic Development Location to provide approximately 180 new dwellings. However, it is considered the land promoted as a part of this Representation would be in addition to this allocation.<br><br>4.43. The JSP has identified a need for 1,300 new homes in the rural areas of South Gloucestershire. Paragraph 2.9 states that *"Large scale developments in places across the District, making best use of Transport Corridors and existing and new services and facilities and employment opportunities"* can deliver the need for housing outside of the Strategic Development Locations.<br><br>4.44. Paragraphs 2.47 and 2.48 reiterate the requirement for a Plan led approach to meeting this growth. Whilst we maintain that the Land at Westerleigh should be included within the Strategic Development Locations set out in the JSP, if it was to be discounted by the Local Authority, it is clear for the reasons already given that it should be viewed as a highly sustainable location for potential Non-Strategic Development.<br><br>4.45 The site could complement the planned development in existing and new Strategic Development Locations identified within the Emerging JSP and SGLP. Including The Science Park and Emersons Green.<br><br>4.46 Therefore, we would support 'Option 2 - Rural Places Inside the Green Belt.' This will ensure that the SGLP will avoid overburdening individual rural villages with significant numbers of new housing, whilst sites such as the Land at Westerleigh has the potential to deliver much needed housing in the form of a sustainable development within the existing Green Belt.<br><br>4.47 Therefore, the site should be included within the SGLP. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sue Hope |
| **Comment ID** | 411169/2036 |

| | |
|---|---|
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Non-strategic development should be distributed as widely as possible throughout South Gloucestershire, so that existing communities are better able to absorb the scale of new development, therefore the option to look at non-strategic growth areas both inside and outside the Green Belt. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Newland Homes |
| **Comment ID** | 2857441/2049 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | 3.11 The Council are seeking views on the preferred approach to rural growth. Paragraphs 2.70 – 2.72 of the SGLP state:<br><br>*"Taking account of the key issues which need to be considered in formulating a Plan for non-strategic growth, three broad options are suggested, containing places drawn from those listed in Table 1 above...*<br><br>*...Option 1: Rural Places Outside the Green Belt;*<br><br>*Option 2: Rural Places Inside the Green Belt;*<br><br>*Option 3: Rural Places Both Inside and Outside the Green Belt."*<br><br>3.12 As would be expected, Option 3 'Rural Places Both Inside and Outside the Green Belt' results in the largest number of places being investigated for non-strategic level development, 35 places in total would be assessed. With regards to Option 3, Paragraph 2.78 of the SGLP states:<br><br>*"This will facilitate an approach of directing growth to places with the highest levels of sustainable access and places which avoid and minimise harm to existing built and natural assets."*<br><br>3.13 Newland Homes are not supportive of Option 1 as it restricts the Council's search to only 12 places. Paragraph 2.50 of the SGLP states:<br><br>*"Non-strategic growth will need to be sensitive to the existing scale of each settlement and have a positive impact on the character and function of communities."*<br><br>3.14 The housing requirement from non-strategic sites in South Gloucestershire is 1,300. This level of housing split between only the 12 places Outside of the Green Belt places would mean each place accommodating an additional 108 dwellings within the Plan Period. This number of dwellings may not be suitable for the smaller settlements. This Option could also lead to highly unsustainable patterns of development.<br><br>3.15 Newland Homes feel that is more appropriate to explore places both Inside and Outside of the Green Belt and urge the Council to consider the most sustainable places. The Council has conceded that it cannot currently demonstrate a Five Year Supply of Housing Land. It is therefore imperative that the Council looks to allocate further sites for residential development that can be delivered in the short term. This will prevent a recurrence of the Council's current land position.<br><br>3.16 Olveston was considered as a Strategic Development Location in the JSP but was found unsuitable due to constraints surrounding the settlement accommodating development of this scale. Land Between Aust Road and Elberton Road, Olveston is available for development now and is non-strategic in scale. Smaller scale development of circa 20 – 30 homes on this site would not conflict with these constraints. It could significantly help the Council in reaching its future housing requirement by 2036, but crucially in the short term. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sue Radford-Hancock - Acton Turville Parish Council |
| **Comment ID** | 1060353/2091 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Under the proposal, it appears that Green Belt land and also areas within Areas of Outstanding Natural Beauty which currently enjoy protection from development, can be utilised for housing development for any sector of the population.<br><br>**Once an area of Green Belt is opened for development it is lost forever and cannot be replaced. Acton Turville Parish Council strongly objects to the diminution of the Green Belt in this manner.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alex Atkinson - Edward Ware Homes (Land East of the A4174, Shortwood) |
| **Comment ID** | 19323937/2099 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Edward Ware Homes (Mr. Alex Atkinson) - Pegasus Group (Mr. Daniel Weaver).pdf (2.6 MB) |

| | |
|---|---|
| **Respondent Name** | Alex Atkinson - Edward Ware Homes (Land at Woodhouse Down, Almondsbury) |
| **Comment ID** | 20248001/2120 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Edward Ware Homes (Mr. Alex Atkinson) - Pegasus Group (Mr. Daniel Weaver).pdf (14.4 MB) |

| | |
|---|---|
| **Respondent Name** | Rebecca Magee |
| **Comment ID** | 19843841/2129 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Dear Sir/Madam,<br><br>I am writing in response to the Local Plan Consultation Document to express my areas of concern.<br><br>Referring to the Non-Strategic Development Question 3 on Page 71, this refers to 1,300 new homes which will be built in Rural Sites. The areas identified include Olveston, Tockington, Old Down, Almondsbury, Alveston and Hortham Village.<br><br>As a resident of the and community I would like to propose the development should not be within the Green Belt.<br><br>My reasons are as follows:<br><br>1. Increased housing will result in increased traffic through the villages of Tockington and Olveston which is already causing many problems (This is to be made worse by the forthcoming withdrawal of the Tolls on the Severn Bridge Crossing at the end of 2018). With regard to this particular issue the villages are already being used as a cut-through from Yate and Bristol and surrounding areas to Wales which is very dangerous as they drive very fast. This would become significantly worse with any increased traffic going through the village and particularly dangerous with many children and old people walking on single track footpaths. There is also only one road that goes through Olveston and Tockington which would cause gridlock with any increase of traffic.<br><br>2. Parking in the area is also an issue in both villages, in particular around The Green in Tockington and The Street and outside Olveston Primary School in Olveston. To increase the number of cars parked with increased housing could result in accidents particularly with the children who walk to School along roads with narrow or no pavements and people already park up on the pavement and on both sides of the road and vehicles can not get through. This would prove impossible if there were houses built opposite the School.<br><br>I have been involved in a Traffic and Parking Sub Group in the area led by concerned local residents and have *attached a copy of the Discussion Document our Group published in the local Parish Magazine for your information.*<br><br>3. I would like to keep the character and appearance of our beautiful villages. They have been relatively unchanged for Centuries and I have lived in . It's also really important to maintain these few Green Belt areas which are already being eroded in the country.<br><br>4. The areas of Olveston and Tockington have very limited amenities and could not sustain an increase in population. There is a very limited Public Transport service and no buses into Bristol so it would be very difficult for people to live in this area without a car. There are very few shops and local facilities.<br><br>5. There is a lack of local employment opportunities in the area, and very limited transport in the area.<br><br>A suggestion for alternative housing development is the area between Aust and Pilning either side of the Dual Carriageway where there are plenty of open spaces outside the Green Belt with excellent links to Bristol, the Motorway and Wales. There are also a number of other sites that could be used where there were old offices or industrial sites in the area which would not impact on the Green Belt areas of Olveston and Tockington. |
| **Attached documents** | Rebecca Magee.pdf (131 KB) |

| | |
|---|---|
| **Respondent Name** | Peter D. Box |
| **Comment ID** | 19453441/2154 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **3.2 Native Flora and Fauna:**<br><br>Many native species of flora and fauna are seriously threatened by the encroachment of urban areas into hitherto virgin countryside. Some are formally ranked as endangered. To protect these species with which we humans share our planet, every effort must be made to protect their habitats and allow unrestricted migration to ensure that gene pools are maintained in a healthy condition. Looking at that part of the JSP relevant to SG it is noted that three major housing developments are proposed for the Northern area of the County. 500 units are planned for Thornbury (in |

| | |
|---|---|
| | addition to large housing developments in the pipeline), 1,200 for Charfield and a staggering 3,000 for Buckover. All three proposed developments are geographically close and whilst outside the current Green Belt (just) would effectively form an urban barrier between the Green Belt and open country to the North. Whilst some species adapt to survive life in urban areas, the long term effects of these adaptations is as yet unknown. When birds start to imitate telephone ring tones when calling for a mate, it is surely the start of a slippery slope to extinction.<br><br>Furthermore, I have yet to see evidence of a detailed Survey of what native flora and fauna would be put at risk by these developments. The Buckover site mentioned above, is currently prime agricultural land: its implementation would destroy some five farms covering forty fields with 20km (12.5 miles) of field boundaries and hedgerows, all vital thoroughfares for wildlife. Also destroyed would be a disused Quarry and an area of woodland (Rudge Wood); both habitats different to the prevailing farmland. Admittedly one version of a Plan for Buckover shows the woodland retained within the development but surrounded by essentially urban development its unique character would be destroyed. Unless it were to be rigorously maintained it would be in danger of being polluted by such detritus as shopping trolleys, empty beer cans and the seemingly inevitable plastic waste. And such maintenance itself, would impact on the security of the habitat.<br><br>**3.3 Green Belt:**<br><br>The function of the Avon Green Belt is stated in the following Policy:<br><br>"A Green Belt shall continue to surround and separate Bristol and Bath and will be kept open in order to:<br><br>o Check the unrestricted sprawl of the Bristol conurbation and Bath;<br><br>o **Assist in safeguarding the surrounding countryside from encroachment;**<br><br>o **Prevent neighbouring towns from merging into one another;**<br><br>o Preserve the setting and special character of **villages,** towns and historic cities; and<br><br>o Assist in urban regeneration."<br><br>As mentioned in Section 3.2 above, proposed developments at Thornbury, Charfield and Buckover will contravene a significant amount of the Green Belt Policies.<br><br>To counter this argument with the statement that the proposed developments are outside the current Green Belt is a cynical misinterpretation of the whole principle of Green Belt. The developments are on the edge of the Green Belt and would in any case clearly fail to safeguard the surrounding countryside from urban encroachment. The connection between Green Belt and open countryside would be severed, turning the Green Belt into something akin to a land-locked lagoon with unpredictable effects on wildlife within.<br><br>**7.4 Green Belt Adjustment:**<br><br>Whilst not advocating *ad hoc* annexation of designated Green Belt land, there may well be a case for sacrificing some such land adjacent to existing urban areas providing the Green Belt is enlarged by a greater amount further out. For example, use of Green Belt land to the North East of Bristol may be acceptable if the Green Belt is extended Northwards to include Thornbury, Buckover and Charfield and thence to meet the Cotswold AONB. The area of Green Belt within SG fell from 71,730 ha in 2014 to 71,630 ha in 2017: it would be a good time to reverse that trend. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hall and Woodhouse |
| **Comment ID** | 16757633/2165 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Non-strategic Growth Options:**<br><br>4.4 The Council has put forward 3 Options for non-strategic growth within the District as follows:<br><br>o Option 1: Rural places outside Green Belt<br><br>o Option 2: Rural places inside the Green Belt<br><br>o Option 3: Rural places both inside and outside the Green Belt<br><br>4.5 We support Options 2 and 3 as it enables the Council in the first instance to consider the most sustainable options regardless of their Green Belt status which accords with Para 84 of the NPPF which states: |

| | |
|---|---|
| | **"When drawing up or reviewing Green Belt boundaries Local Planning Authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary."**<br><br>4.6 Therefore, Para 84 of the NPPF makes it very clear that sustainable development is to be a key consideration in the review of Green Belt boundaries and therefore, Green Belt sites should not be excluded at the outset of a sieving process in the selection of non-strategic development sites.<br><br>4.7 Green Belts can be altered where exceptional circumstances exist (in this case the housing requirements of the South Gloucestershire Local Plan constitute exceptional circumstances) and the review of the Local Plan provides the opportunity to review the Green Belt.<br><br>**Sustainability Appraisal:**<br><br>4.8 The Council has undertaken a Sustainability Appraisal (SA) of the 3 non-strategic options. Overall, the number of positive relationships or potential for positive relationships against the SA objectives are most abundant for Option 3 (potential for positive relationship with 14 objectives), followed by Option 2 (7) and Option 1 (6). However, we note that Option 1's overall performance includes a positive relationship against 'protect and enhance valuable Green Belt' whereas Options 2 and 3 score negatively against this objective. The protection of Green Belt is not a sustainability consideration and thus its inclusion in the SA provides an inaccurate account of the sustainability of the Options.<br><br>4.9 Hall and Woodhouse object to the validity of the SA objective 'protect and enhance valuable Green Belt' which is essentially a Planning Tool to prevent settlements from merging with one another, not a sustainability consideration. Green Belts may contain assets such as best and most versatile agricultural land, ecologically important areas, green infrastructure, valued landscapes etc but these are already listed as objectives in the SA, and Options and Policies will already be appraised against these objectives. Rather obviously, the Council's SA of Option 1 (places outside the Green Belt) gives it a positive against the Green Belt objective, thus suggesting Option 1 is more sustainable than Options 2 and 3 in this respect. Simply because an Option may perform better against loss of Green Belt is not indicative of a site being more sustainable than another. The performance of the Options with respect to Green Belt Purposes and the application of national Policy in reviewing the Green Belt are an entirely separate matter and not one for the Sustainability Appraisal, and so this SA objective should be deleted from the SA to avoid it blurring the reporting of the true sustainability of Options and Policy proposals.<br><br>4.10 In other respects, the SA usefully shows that Options 2 and 3 have greater scope for the mitigation of harm (as they contain more possible locations to explore further); and they score better in respect of access to healthcare, education, employment and community facilities than Option 1 which only includes locations furthest away from where these uses are concentrated. Environmental impacts across the Options are mostly uncertain at this stage as precise locations are not specified.<br><br>4.11 Therefore, in summary, (and despite the discrimination against Green Belt options in the Appraisal - which is not a sustainability consideration), on almost all other objectives, Option 3 performs best, followed by Option 2, and Hall and Woodhouse support the further consideration of Options 2 and 3. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Crest Strategic Projects & Crest Nicholson (South West) Limited |
| **Comment ID** | 20274273/2171 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | 10) For the reasons set out below AK supports Option 3, which is to identify non-strategic growth both Inside and Outside of the Green Belt.<br><br>11) Whilst a key aim of the Planning System is to protect areas of Green Belt which serve a useful purpose, given the scale of housing delivery required over the next 20 years, for the reasons set out below it is realistic to expect that some of this housing will have to be accommodated in areas currently identified as Green Belt. This has already been ably demonstrated through the JSP that identifies there are no further locations outside of the Green Belt capable of delivering strategic growth; Coalpit Heath and Yate SDLs, and the contingency at Chipping Sodbury are all located in the Green Belt. For the reasons set out below AK considers the same contention can be applied to non-strategic growth in South Gloucestershire.<br><br>12) Alder King considers that Option 1, looking only at areas outside the Green Belt would present real difficulty in ensuring delivery of the new housing is identified in sustainable locations. Some of the locations have already been subject to and/or identified for levels of growth appropriate for the size of the settlement such as Failand and Chipping Sodbury, whilst others simply do not have the services to support anything more than minor growth regardless of their Green Belt status such as Hawkesbury Upton and Marshfield. Growth in locations such as these will only exacerbate travel by car and the scale of growth proportionate to the size of the village would be insufficient to make significant improvements to Public Transport services.<br><br>13) Taking the list of 9 places outside the Green Belt identified as appropriate for investigation in Option 1, whilst an average 20% growth of each of these locations could just about (on paper) deliver the required 1,300 homes, a number of these locations could not be realistically considered feasible for such growth and certainly not all of the contingency sites would be catered for. Villages such as Rangeworthy, Cromhall and Old Sodbury are in some cases little more than ribbon development with limited services and almost half of these are located within and constrained by the Cotwolds AONB. While it is agreed that some development in these locations could assist in supporting the longevity of local rural services, it is not the case that all these locations should take 20% extra growth in order to meet the housing figures required. In any event, it would not meet the actual requirement of 1,800 homes.<br><br>14) Turning to more established rural areas that could be considered more feasible in the list of 9 in Option 1, when additional growth of these locations is reviewed in conjunction with and addition to existing allocated/Permitted Development including that in the JSP, it is fair to say that a number of these have already been allocated a proportionate level of growth during the existing Plan Period. Failand and Engine Common are good examples; extra growth here would represent a disproportionate amount of new development for that locality.<br><br>15) In respect of Chipping Sodbury, the settlement has been identified as a contingency site for strategic growth of 1,500 houses in the Draft JSP. It is highly likely that this will come forward over the Plan Period and whilst Chipping Sodbury is an established area and capable of sustainable growth, to allocate more sites of any significance at Chipping Sodbury for non-strategic growth would likely result in over-development of the location, especially when read with the recent and future allocations intended for the adjoining area of Yate. Allocation of non-strategic sites |

| | |
|---|---|
| | should complement the strategic growth in the JSP and should result in proportionate and balanced development of villages. To add further development to Chipping Sodbury, however apparently sustainable a place it appears in isolation, would not be appropriate.<br><br>16) In light of the contingency allocation of 1,500 homes at Chipping Sodbury, and AK's contention that there is a high possibility of this site being required to deliver in the next 20 years, it is considered that Chipping Sodbury should be removed entirely from the list of 35 rural places for investigation for non-strategic growth and instead be indicated as a (contingency) SDL settlement. Chipping Sodbury should be elevated to the same status as Yate, Thornbury, Coalpit Heath, Charfield and Buckover.<br><br>17) AK on behalf of Crest Strategic Projects explored the issue of contingency in detail through the Representations submitted on the Publication Draft JSP in January 2018. These Representations are appended to this Submission for completeness. The Representations make the case for the Chipping Sodbury SDL to be subject to clear Policy/allocation in this South Gloucestershire Local Plan in order for there be to be prospect that the 775 homes identified within the Plan Period can be delivered.<br><br>18) Given the uncertainties over delivery of the SDLs not just in South Gloucestershire but across the sub-region AK firmly believes that there will be a requirement for the Chipping Sodbury site to be released; there is no sense in waiting for Plan Review to start that work. It is encouraging that the LPA has Consulted with the public over the SDL in the same vein as the other locations and we would strongly advocate a similar approach moving forward. In the context of the Non-strategic Sites Consultation, it is important to recognise this and not overload Chipping Sodbury with further allocations. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Newland Homes |
| **Comment ID** | 2857441/2178 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | 3.23 The Council are seeking views on the preferred approach to rural growth. Paragraphs 2.70 – 2.72 of the SGLP state:<br><br>*"Taking account of the key issues which need to be considered in formulating a Plan for non-strategic growth, three broad options are suggested, containing places drawn from those listed in Table 1 above...*<br><br>*... Option 1: Rural Places Outside the Green Belt*<br><br>*Option 2: Rural Places Inside the Green Belt*<br><br>*Option 3: Rural Places Both Inside and Outside the Green Belt."*<br><br>3.24 As would be expected, Option 3 'Rural Places Both Inside and Outside the Green Belt' results in the largest number of places being investigated for non-strategic level development, 35 places in total would be assessed. With regards to Option 3, Paragraph 2.78 of the SGLP states:<br><br>*"This will facilitate an approach of directing growth to places with the highest levels of sustainable access and places which avoid and minimise harm to existing built and natural assets."*<br><br>3.25 Newland Homes are supportive of the inclusion of Green Belt sites in the Council's assessment of places suitable for non-strategic growth. However, if the Council say they are looking to direct growth to places with the highest levels of sustainable access, why are they not also assessing edge of town areas in the Green Belt outside of the SDLs, as well as the rural areas?<br><br>3.26 Clarity is sought as to whether the SGLP intends to ignore those smaller-scale sites being promoted for development at Yate, Charfield, Thornbury and Coalpit Heath, outside of the identified SDLs. Even where such sites rank highly in sustainability terms. DLP Planning consider this rationale illogical, as it arbitrarily excludes consideration of non-strategic development adjacent to the most sustainable settlements in the Authority. It is considered that the Council may be overlooking numerous potential non-strategic development sites at the towns such as Yate, Charfield, Thornbury and Coalpit Heath, due to identification of SDLs at these settlements, and therefore will not submit a sound Plan that considers all reasonable options and is justified by evidence. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Russell Lyons |
| **Comment ID** | 20291201/2187 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Rackham Planning agrees with the general hierarchal principle of locating new housing firstly, in and around Town Centres on previously developed (Brownfield) land, secondly on Greenfield sites in and around Town Centres, thirdly on Greenfield/Brownfield sites on the edges of sustainable settlements not in the Green Belt and finally on sites on the edges of sustainable settlements within the Green Belt. However, the reality is that in South Gloucestershire the Green Belt is approximately 23,000 hectares and covers open land and countryside as well as a number of settlements "washed over" by the Green Belt. The total coverage within the District is approximately 61% and therefore it is considered in order to "significantly boost" housing supply in accordance with Paragraph 47 of the NPPF it is inevitable that some development in the Green Belt will need to take place, particularly in regard to sustainable rural settlements. Rackham Planning therefore considers that South Gloucestershire Council should investigate sites both Inside and Outside the Green Belt.<br><br>The JSP identified a requirement for 1,300 new homes plus a contingency of 500 new homes from non-strategic development sites across the region. This should be considered as a true minimum; the Council are in a position to allocate sites for more than their allocated requirement if they so wish. Indeed, we consider it would be prudent of them to do so given the problems experienced in maintaining a 5 year housing land supply in the current Plan Period. It does not make sense for rural communities in the Green Belt to be left behind those located outside of it. Due to the |

| | |
|---|---|
| | location of the Green Belt in South Gloucestershire adjacent to the Bristol North and East Fringes it is a reality that many of the rural settlements located within the designation have better access to services and facilities than settlements outside the Green Belt to the North.<br><br>We believe that exceptional circumstances exist, as required by Paragraph 83 of the NPPF, to justify the release of sites in the Green Belt for non-strategic growth. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Land at Bromley Heath Landowners |
| **Comment ID** | 20293793/2193 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | 5. The SGLP identifies that 1,300 new homes are required with a potential contingency of 500 dwellings on individual non-strategic sites. Whilst Alder King (AK) has submitted Representations to the JSP contending that the identified overall housing need figure is insufficient to meet the needs of the West of England, the general intention to provide additional housing for non-strategic growth in line with the JSP is supported. Clearly the SGLP will need to respond to any changes in the quantum and distribution of development should the JSP be subject to modification.<br><br>6. It is interesting to reflect on the fact that in the JSP there are three contingency options for accommodating any shortfall in delivery, at Clevedon, Chipping Sodbury and via the additional 500 homes in 'rural' South Gloucestershire. In the event that the JSP numbers increase then there is a reasonable probability that the requirement in rural South Gloucestershire might increase further, as it has already been identified as capable of delivering more homes if necessary. AK believes it is capable of delivering much more than the 1,300 - 1,800 that is subject of the present distribution.<br><br>7. Critically AK considers that the SGLP should plan for the entirety of the 1,800 homes. There is no sense in not doing so. Responding to the issue now is vital in ensuring that the contingency 'pot' can respond at the earliest opportunity and when required to do so, not to have to wait for LP Review which could take years. Given the issues surrounding the delivery of many of the SDLs, AK considers that there is little doubt that the contingencies will be required during the Plan Period. The opportunity to increase the supply of housing should be taken now, albeit AK is not resistant to a cascade arrangement whereby the sites that form part of the 500 homes contingency can be identified as such and necessary (but flexible) restrictions be enshrined in Policy.<br><br>8. For the reasons set out below AK supports Option 3, which is to identify non-strategic growth both Inside and Outside of the Green Belt. In addition to the commentary above regarding the specific JSP contingency, AK further considers that this LP process should identify sites to be safeguarded from the Green Belt for future housing delivery. This complies entirely with Paragraph 85 of the NPPF and in particular the requirements that state:<br><br>o Where necessary, identify in their Plan's areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the Plan Period;<br><br>o Make clear that the safeguarded land is not allocated for development at the present time. Planning Permission for the permanent development of safeguarded land should only be granted following a Local Plan Review which proposes the development;<br><br>o Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the Development Plan Period<br><br>9. Given the context for Green Belt release now, both in terms of new Strategic Development Locations (SDLs) and non-strategic locations, there can be little doubt that further Green Belt releases will be required in any LP Review. The urban living opportunity is a finite source of supply and there are few remaining sustainable locations for growth outside of the Green Belt to deal with the inevitable continuous pressure to accommodate the needs of the sub-region and South Gloucestershire at the end of the Plan Period. In order to maintain permanence of the Green Belt, the matter of safeguarding needs to be addressed now.<br><br>10. If areas of Green Belt are reviewed, assessed and included for such safeguarding at this time, it would result in proactive planning and may avoid another Green Belt Review in the short to medium term with appropriate phasing restrictions being able to be applied through Policy. Accordingly it is important for South Gloucestershire Council over the coming Months to identify further contingency site possibilities exceeding the identified 500 unit target to ensure that effective long term housing delivery is achievable and that the Plan remains in accordance with the NPPF, specifically its Green Belt and Local Plan's Plan making Policies.<br><br>11. It is acknowledged that the Government attaches great importance to the Green Belt and when reviewing Green Belt boundaries, Local Planning Authorities should take account of the need to promote sustainable patterns of development, considering the consequences for sustainable development of channelling development towards urban areas as well as villages and towns within the Green Belt.<br><br>12. AK welcomes the Council's acknowledgment in the Draft Plan that a significant proportion (61%) of South Gloucestershire is covered by the Bristol and Bath Green Belt. Whilst a key aim of the Planning System is to protect areas of Green Belt which serve a useful purpose, given the scale of housing delivery required over the next 20 years and for the reasons set out below, it is realistic to expect that some of this housing will have to be accommodated in areas currently identified as Green Belt. This has already been ably demonstrated through the JSP that identifies there are no further locations outside of the Green Belt capable of delivering strategic growth; Coalpit Heath and Yate SDLs are both located in the Green Belt and the Plan envisages a capacity of 3,800 homes being located here. For the reasons set out below AK considers the same contention can be applied to non-strategic growth in South Gloucestershire. |

| | |
|---|---|
| | 13. Alder King consider that Option 1, looking only at areas outside the Green Belt would present real difficulty in ensuring delivery of the new housing is identified in sustainable locations. Some of the locations have already been subject to and/or identified for levels of growth appropriate for the size of the settlement such as Failand and Chipping Sodbury, whilst others simply do not have the services to support anything more than minor growth regardless of their Green Belt status such as Hawkesbury Upton and Marshfield. Growth in locations such as these will only exacerbate travel by car and the scale of growth proportionate to the size of the village would be insufficient to make significant improvements to Public Transport services.<br><br>14. Taking the list of 9 places outside the Green Belt identified as appropriate for investigation in Option 1, whilst an average 20% growth of each of these locations could just about (on paper) deliver the required 1,300 homes, a number of these locations could not be realistically considered feasible for such growth and certainly not all of the contingency sites would be catered for. Villages such as Rangeworthy, Cromhall and Old Sodbury are in some cases little more than ribbon development with limited services and almost half of these are located within and constrained by the Cotwolds AONB. While it is agreed that some development in these locations could assist in supporting the longevity of local rural services, it is not the case that all these locations should take 20% extra growth in order to meet the housing figures required. In any event, it would not meet the actual requirement of 1,800 homes.<br><br>15. Turning to more established rural areas that could be considered more feasible in the list of 9 in Option 1, when additional growth of these locations is reviewed in conjunction with and addition to existing allocated/Permitted Development including that in the JSP, it is fair to say that a number of these have already been allocated a proportionate level of growth during the existing Plan Period. Failand and Engine Common are good examples; extra growth here would represent a disproportionate amount of new development for that locality.<br><br>16. In respect of Chipping Sodbury, the settlement has been identified as a contingency site for strategic growth of 1,500 houses in the Draft JSP. It is highly likely that this will come forward over the Plan Period and whilst Chipping Sodbury is an established area and capable of a sustainable growth, to allocate more sites of any significance at Chipping Sodbury for non-strategic growth would likely result in over-development of the location, especially when read with the recent and future allocations intended for the adjoining area of Yate. Allocation of non-strategic sites should complement the strategic growth in the JSP and should result in proportionate and balanced development of villages. To add further development to Chipping Sodbury, however apparently sustainable a place it appears in isolation, would not be appropriate.<br><br>17. In light of the contingency allocation of 1,500 homes at Chipping Sodbury, and AK's contention that there is a high possibility of this site being required to deliver in the next 20 years, it is considered that Chipping Sodbury should be removed entirely from the list of 35 rural places for investigation for non-strategic growth and instead be indicated as a (contingency) SDL settlement. Chipping Sodbury should be elevated to the same status as Yate, Thornbury, Coalpit Heath, Charfield and Buckover.<br><br>18. AK considers that there are exceptional circumstances for reviewing Green Belt boundaries and areas for development allocation inside the Green Belt boundary in this context of delivery of sustainable growth in rural South Gloucestershire. As such it is recommended that Option 3, reviewing areas within the Green Belt as well as outside the Green Belt is the best option to achieve the most appropriate form of sustainable growth. Indeed, the proximity of the Green Belt to major urban areas makes it inherently more sustainable to build in, in terms of supporting further investment in Public Transport and minimising the use of, and distances travelled by, the private car.<br><br>19. Some locations identified within the Green Belt are inherently sustainable and capable of delivering non-strategic growth. Equally there are potentially sound locations in the Green Belt that are unfeasible to accommodate growth due to the physical constraints of their surroundings and topography. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Spitfire Bespoke Homes Ltd |
| **Comment ID** | 19738689/2200 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Question 3.2 asks Respondents to highlight which is their preferred Option. We would support Option 3 both Within and Outside of the Green Belt, as this gives the highest number of potential areas for development meaning lower overall increases in settlement size and a larger amount of areas with high sustainability credentials in terms of access to key services and facilities.<br><br>One settlement where non-strategic growth should take place which, is currently constrained by the Green Belt, is the village of Winterbourne, more specifically a site on its Western boundary to the North of the railway line, but this should not act as a constraint to preclude any future development potential. It is suitable for development and with existing recognisable and robust boundaries as well as abutting the current settlement it will not cause significant harm to the openness of the Green Belt. This is despite the fact that it is contained within Cell 16a of the Green Belt Assessment which is identified as a major contributor to the Purposes of the Green Belt in terms of openness and preventing the sprawl of the Bristol North Fringe and Winterbourne Down beyond the M4. This is because the entire Cell is made up of a 60ha swathe of land. The subject site is approximately 6.07ha in size and abuts the Winterbourne Settlement Boundary, and benefits from being North of the railway line which Green Belt Assessment Stage 2 uses to support the strategic allocation at Coalpit Heath. Indeed. It is separated from the built -up area of Bristol to the West (Stoke Gifford) by another major infrastructure, the M5. It would therefore have limited impacts on the retention of the gap between Winterbourne Down and the Bristol North Fringe Area and the wider topography of the area would be maintained such that areas the openness would be preserved overall.<br><br>Albeit a non-strategic site, there aren’t sufficient sites existing within the settlement of Winterbourne to deliver future market and Affordable Housing growth. Some development within the Green Belt is required where it best preserves the openness of the Green Belt and the subject site is one such location, which will be assessed in greater detail below. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Strategic Land Partnerships/ Mr. S. Jarrett |
| **Comment ID** | 20312833/2207 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |

| | |
|---|---|
| **Comment** | 5) The SGLP identifies that 1,300 new homes are required with a potential contingency of 500 dwellings on individual non-strategic sites. Whilst Alder King (AK) has submitted Representations to the JSP contending that the identified overall housing need figure is insufficient to meet the needs of the West of England, the general intention to provide additional housing for non-strategic growth in line with the JSP is supported. Clearly the SGLP will need to respond to any changes in the quantum and distribution of development should the JSP be subject to modification.<br><br>6) It is interesting to reflect on the fact that in the JSP there are three contingency options for accommodating any shortfall in delivery, at Clevedon, Chipping Sodbury and via the additional 500 homes in 'rural' South Gloucestershire. In the event that the JSP numbers increase then there is a reasonable probability that the requirement in rural South Gloucestershire might increase further, as it has already been identified as capable of delivering more homes if necessary. AK believes it is capable of delivering much more than the 1,300 - 1,800 than is subject of the present distribution.<br><br>7) Critically AK considers that the SGLP should plan for the entirety of the 1,800 homes. There is no sense in not doing so. Responding to the issue now is vital in ensuring that the contingency 'pot' can respond at the earliest opportunity and when required to do so, not to have to wait for LP Review which could take years. Given the issues surrounding the delivery of many of the SDLs AK considers that there is little doubt that the contingencies will be required during the Plan Period. The opportunity to increase the supply of housing should be taken now, albeit AK is not resistant to a cascade arrangement whereby the sites that form part of the 500 homes contingency can be identified as such and necessary (but flexible) restrictions be enshrined in Policy.<br><br>8) For the reasons set out below AK supports Option 3, which is to identify non-strategic growth both Inside and Outside of the Green Belt. In addition to the commentary above regarding the specific JSP contingency AK further considers that this LP process should identify sites to be safeguarded from the Green Belt for future housing delivery. This complies entirely with Paragraph 85 of the NPPF and in particular the requirements that state:<br><br>o Where necessary, identify in their Plan's areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the Plan Period;<br><br>o Make clear that the safeguarded land is not allocated for development at the present time. Planning Permission for the permanent development of safeguarded land should only be granted following a Local Plan Review which proposes the development;<br><br>o Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the Development Plan Period.<br><br>9) Given the context for Green Belt release now, both in terms of new Strategic Development Locations (SDLs) and non-strategic locations, there can be little doubt that further Green Belt releases will be required in any LP Review. The urban living opportunity is a finite source of supply and there are few remaining sustainable locations for growth outside of the Green Belt to deal with the inevitable continuous pressure to accommodate the needs of the sub-region and South Gloucestershire at the end of the Plan Period. In order to maintain permanence of the Green Belt, the matter of safeguarding needs to be addressed now.<br><br>10) If areas of Green Belt are reviewed, assessed and included for such safeguarding at this time, it would result in proactive Planning and may avoid another Green Belt Review in the short to medium term with appropriate phasing restrictions being able to be applied through Policy. Accordingly it is important for South Gloucestershire Council over the coming Months to identify further contingency site possibilities exceeding the identified 500 unit target to ensure that effective long term housing delivery is achievable and that the Plan remains in accordance with the NPPF, specifically its Green Belt and Local Plan's Plan making Policies.<br><br>11) It is acknowledged that the Government attaches great importance to the Green Belt and when reviewing Green Belt boundaries, Local Planning Authorities should take account of the need to promote sustainable patterns of development, considering the consequences for sustainable development of channelling development towards urban areas as well as villages and towns within the Green Belt.<br><br>12) AK welcomes the Council's acknowledgment in the Draft Plan that a significant proportion (61%) of South Gloucestershire is covered by the Bristol and Bath Green Belt. Whilst a key aim of the Planning System is to protect areas of Green Belt which serve a useful purpose, given the scale of housing delivery required over the next 20 years, for the reasons set out below it is realistic to expect that some of this housing will have to be accommodated in areas currently identified as Green Belt. This has already been ably demonstrated through the JSP that identifies there are no further locations outside of the Green Belt capable of delivering strategic growth; Coalpit Heath and Yate SDLs are both located in the Green Belt and the Plan envisages a capacity of 3,800 homes being located here. For the reasons set out below AK considers the same contention can be applied to non-strategic growth in South Gloucestershire.<br><br>13) Alder King consider that Option 1, looking only at areas outside the Green Belt would present real difficulty in ensuring delivery of the new housing is identified in sustainable locations. Some of the locations have already been subject to and/or identified for levels of growth appropriate for the size of the settlement such as Failand and Chipping Sodbury, whilst others simply do not have the services to support anything more than minor growth regardless of their Green Belt status such as Hawkesbury Upton and Marshfield. Growth in locations such as these will only exacerbate travel by car and the scale of growth proportionate to the size of the village would be insufficient to make significant improvements to Public Transport services.<br><br>14) Taking the list of 9 places outside the Green Belt identified as appropriate for investigation in Option 1, whilst an average 20% growth of each of these locations could just about (on paper) deliver the required 1,300 homes, a number of these locations could not be realistically considered feasible for such growth and certainly not all of the contingency sites would be catered for. Villages such as Rangeworthy, Cromhall and Old Sodbury are in some cases little more than ribbon development with limited services and almost half of these are located within and constrained by the Cotwolds AONB. While it is agreed that some development in these locations could assist in supporting the longevity of local rural services, it is not the case that all these locations should take 20% extra growth in order to meet the housing figures required. In any event, it would not meet the actual requirement of 1,800 homes.<br><br>15) Turning to more established rural areas that could be considered more feasible in the list of 9 in Option 1, when additional growth of these locations is reviewed in conjunction with and addition to existing allocated/Permitted Development including that in the JSP, it is fair to say that a number of these have already been allocated a proportionate level of growth during the existing Plan Period. Failand and Engine Common are good examples; extra growth here would represent a disproportionate amount of new development for that locality.<br><br>16) In respect of Chipping Sodbury, the settlement has been identified as a contingency site for strategic growth of 1,500 houses in the Draft JSP. It is highly likely that this will come forward over the Plan Period and whilst Chipping Sodbury is an established area and capable of sustainable growth, to allocate more sites of any significance at Chipping Sodbury for non-strategic growth would likely result in over-development of the location, especially when read with the recent and future allocations intended for the adjoining area of Yate. Allocation of non-strategic sites should complement the strategic growth in the JSP and should result in proportionate and balanced development of villages. To add further development to Chipping Sodbury, however apparently sustainable a place it appears in isolation, would not be appropriate. |

| | |
|---|---|
| | 17) In light of the contingency allocation of 1,500 homes at Chipping Sodbury, and AK's contention that there is a high possibility of this site being required to deliver in the next 20 years, it is considered that Chipping Sodbury should be removed entirely from the list of 35 rural places for investigation for non-strategic growth and instead be indicated as a (contingency) SDL settlement. Chipping Sodbury should be elevated to the same status as Yate, Thornbury, Coalpit Heath, Charfield and Buckover.<br><br>18) AK considers that there are exceptional circumstances for reviewing Green Belt boundaries and areas for development allocation inside the Green Belt boundary in this context of delivery of sustainable growth in rural South Gloucestershire. As such it is recommended that Option 3, reviewing areas within the Green Belt as well as outside the Green Belt is the best option to achieve the most appropriate form of sustainable growth. Indeed, the proximity of the Green Belt to major urban areas makes it inherently more sustainable to build in, in terms of supporting further investment in Public Transport and minimising the use of, and distances travelled by, the private car.<br><br>19) Some locations identified within the Green Belt are inherently sustainable and capable of delivering non-strategic growth. Equally there are potentially sound locations in the Green Belt that are unfeasible to accommodate growth due to the physical constraints of their surroundings and topography.<br><br>20) Alveston for example has been identified as a place in the Green Belt to be investigated for housing growth and was reviewed as such as part of the JSP. Alveston could well be considered a sustainable location well placed for transport links and access to community facilities. Nevertheless, the JSP Evidence Base1 for the settlement demonstrates Spatial constraints preventing it from significant growth. For example to the North East, and South West the Green Belt provides an important function separating it from Thornbury and Rudgeway, preventing urban sprawl and the coalescence of these villages. It also has a number of landscape, ecology and heritage constraints in proximity to the Golf Club to the North, and built form including the defensible boundary of the A38 running NE - SW effectively preventing non-strategic development potential to the East. Having been assessed historically and recently, there have been no allocations for some time at Alveston despite its sustainability credentials; and it is difficult to see where it could feasibly grow in a way that wouldn't undermine core Planning principles.<br><br>1 Assessment of Strategic Development Locations Beyond Settlement Boundaries - Location Dashboards (November 2016). |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Cavendish Homes |
| **Comment ID** | 19756993/2213 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | Please find our Response attached as a PDF. |
| **Attached documents** | vendish Homes - SF Planning (Mr. Mark Godson).pdf (562 KB) |

| | |
|---|---|
| **Respondent Name** | Ashfield Land |
| **Comment ID** | 16658689/2272 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Non-Strategic Development Locations:**<br><br>4.8 Figure 2 shows the range of NSD locations that are to be considered further to accommodate housing growth as part of the Emerging NLP. As set out in the preceding section of this statement we support the Strategy of distributed growth across Green Belt and non-Green Belt land; however, in the more rural periphery of SGC growth should be restricted to smaller scale development that focuses on meeting local housing needs.<br><br>*Figure 2. Extract of the places for investigation for non-strategic growth*<br><br>Please see the attached Document for Figure 2 which is referenced above.<br><br>4.9 In particular we strongly support a proposal to allocate a large percentage of the NSDLs within the Green Belt and in close proximity to the main focus of demand: Bristol. In our view, because of their more remote and peripheral nature, NSDLs located further away from the main population and employment centres of Bristol, Thornbury, and Yate should be proportionate to the settlement size and limited in nature to engender sustainable patterns of development. Larger proportions of development should be located in areas where shops, services and other day-to-day facilities are located within walking and cycle distance.<br><br>**The Use of Green Belt Land:**<br><br>4.64 It has been established through the Emerging JSP that both Greenfield and Green Belt land is required in order to meet even the inadequate housing requirements that it currently plans for. This is reiterated within the new Local Plan Documents which states:<br><br>*'The Green Belt covers 61% of the District. The requirement to accommodate at least 1,300 new homes and the potential additional 500 new homes contingency, in a number of places across the rural area, on a range of smaller sites, is likely to require places both outside and within the Green Belt to be investigated. Therefore, we will be looking at options for non-strategic growth in and around rural places which are in the Green Belt.'*<br><br>4.65 We are pleased to see this pragmatic approach being adopted by the Council given that some of the most sustainable locations for new development lie within the Green Belt designation, such as the land we are promoting at Hanham. It has already been found by the four WoE |

| | |
|---|---|
| | Authorities that avoiding the Green Belt in its entirety would result in unsustainable patterns of development forming. We agree with this assertion and Option 1 given under Question 3.2 of the NLP Consultation Document should never have been put forward as it is unrealistic in this context.<br><br>4.66 As we have set out, we consider that Option 3 is the most credible as this looks at both Green Belt and non-Green Belt options for development and is likely to result in the most sustainable sites being selected for development. It is clear however that in any event, further assessment of Green Belt land will be needed; furthermore, we would also suggest that small settlements with few or no facilities, and those without suitable transport links, are discounted for any development proposals above 10 dwellings. Priority should be given to the most accessible locations.<br><br>4.67 We would like to address at this stage that the protection of the Green Belt, whilst of importance, should not be seen as an overriding priority to all other notions of sustainable development. Paragraph 84 of the NPPF sets out that: *'When drawing up or reviewing Green Belt boundaries Local Planning Authorities should take account of the need to promote sustainable patterns of development…'* The NPPF makes no other reference to considerations relevant to alterations to the Green Belt boundary – therefore, in our view, sites which are inherently more sustainable in terms of promoting travel patterns that reduce Greenhouse Gas emissions should be preferred when preparing Local Plans, even if those sites lie within the Green Belt.<br><br>4.68 A recent High Court Decision has further established this important notion. I.M. Properties Development Ltd v Lichfield District Council [2015] EWHC 2077 (Admin) states that *'From that review, it can be seen that there is no test that Green Belt land is to be released as a last resort'* (Paragraph 91) and *'The Green Belt designation is a servant of sustainable development'* (Paragraph 94). It is clear therefore that sustainable development should be looked at holistically rather than placing one particular aspect or element of this (such as Green Belt land) above other demands.<br><br>4.69 In conclusion we therefore consider that land on the edge of existing sustainable settlements should be considered for further Green Belt review and allocated to provide non-strategic levels of growth in South Gloucestershire, such as South of Hanham and in particular Land West of Castle Farm Road which is a sustainable location for such growth. The site could begin to deliver housing within the next five years subject to its removal from the Green Belt designation and Planning Permissions being granted. Accordingly, the site can make an important contribution to housing supply.<br><br>**3.2 Select one option that we should use to investigate sites for non-strategic growth?**<br><br>**i) Option 1 (Outside the Green Belt); or**<br><br>**ii) Option 2 (inside the Green Belt); or**<br><br>**iii) Option 3 (Both Inside & Outside the Green Belt)**<br><br>8.24 We consider that Option 3 is the most credible as this looks at both Green Belt and non-Green Belt locations to accommodate development and is likely to result in the most sustainable sites being selected. It is clear however that in any event, further assessment of Green Belt land will be needed; furthermore, we would also suggest that small settlements with few or no facilities, and those without suitable transport links, are discounted for any development proposals above 10 dwellings.<br><br>8.25 As part of the JSP process the four WoE Authorities identified that avoiding the Green Belt in its entirety would result in unsustainable patterns of development forming. We agree with this assertion and Option 1 should never have been put forward as part of the NLP Consultation as it is unrealistic in this context. |
| **Attached documents** | Ashfield Land - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (30.0 MB) |

| | |
|---|---|
| **Respondent Name** | Amanda Scott |
| **Comment ID** | 20374561/2290 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | **Non-Strategic Growth:**<br><br>I agree with the proposal to make provision for small-scale development in South Gloucestershire's villages where this can be done without significant harm to their character and amenities, and without damage to, or loss of valuable built, historic or natural assets. South Gloucestershire should engage directly with residents and their Representatives before allocating sites and numbers of homes to particular places. Wherever possible, individual sites should only be allocated with the agreement of local people. The design of any new rural developments should enhance the local character and be in sympathy with the local historic architecture. The scale should be in sympathy with the size of the settlement and not overwhelm it.<br><br>The Draft Joint Spatial Plan sets the "non-strategic" (rural) requirement at 1,300 homes in South Gloucestershire. Of the three options in the Local Plan proposals for delivering this, Option 3 would spread it over all 35 sustainable rural settlements, whether or not in the Green Belt. This would be preferable to limiting it to the 12 rural settlements with non-Green Belt status as they would be overwhelmed and their character destroyed. I do not support Option 2 (development confined to rural places inside the Green Belt). Given the very strong Policy presumption against development in the Green Belt, and its sensitivity locally, sites should be chosen in conjunction with local residents and their Representatives. Where they would be in the Green Belt the "exceptional circumstances" test should still be applied.<br><br>There should be no "double jeopardy." Should the North West Yate strategic development become part of the new Local Plan it would have a massive and negative impact on Engine Common and Iron Acton Village. In these circumstances they should not be subject to further non-strategic developments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | H2 Development Management (Land at Williams Close, Longwell Green) |
| **Comment ID** | 20376737/2301 |

| | |
|---|---|
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | 3.11 Table 1 of the SA, assessing the appraisal effects against the sustainability objectives identifies Option 3 (the 'combined approach' considering Rural Places both Inside and Outside the Green Belt, investigating all 35 locations) as the preferred option for growth. Option 2(identifying locations inside the Green Belt) was then the second-best Strategy, with Option 1 (identifying Rural Places Outside of the Green Belt) receiving the worst overall score.<br><br>3.12 The findings from Table 1 of the SA therefore imply that the identification of locations outside of the Bristol and Bath Green Belt are an inappropriate Strategy in which to pursue future development options across the Local Authority.<br><br>3.13 The findings also suggest that the sites inside the Green Belt play a strong social and economic purpose towards meeting housing needs arising in both South Gloucestershire and the Bristol urban area. Later noting that access to essential facilities including healthcare and Hospitals; education; and employment all score best under Option 2.<br><br>*Question 3.2: Options for Non-strategic Growth:*<br><br>4.9 Finding sites which are well related to the Bristol urban area is critical in helping meet the city's housing needs, and the Emerging Spatial Strategy of the South Gloucestershire LP is crucial in ensuring this is achieved.<br><br>4.10 It is critical to note that, following an assessment of the reasonable alternatives the four Unitary Authorities have acknowledged that there are exceptional circumstances to justify the release of Green Belt land. The Council must now find additional sites to incorporate the housing needs arising from both Bristol and its own District, with Green Belt sites being an inevitable consideration.<br><br>4.11 Within the previous Planning Appeal, in weighing up the absence of a five year supply of deliverable housing land and *"the contribution the scheme would make towards meeting the housing need and demand of the community,"* the Planning Inspector concluded that the *"very special circumstances"* to release the site from the Green Belt did not exist at the time.<br><br>4.12 Now it has been acknowledged that 'exceptional circumstances' do exist to release some land from the Green Belt, the site at Williams Close should be given serious consideration in helping to meet the identified market and Affordable Housing needs arising from both Bristol and South Gloucestershire.<br><br>4.13 As is discussed in further detail below, the four Unitary Authorities have also agreed that locations *"within or well-related to the Bristol urban area"* must contribute towards addressing the Affordable Housing need of Bristol as well as their own local need.<br><br>4.14 It is important to consider the findings of the SA which assess each respective option against the Council's sustainability objectives. The results of the SA suggest that the identification of locations outside of the Bristol and Bath Green Belt are an inappropriate strategy in which to pursue future development options across the Local Authority, thus discounting Option 1.<br><br>4.15 The indicative locations presented through Option 1 do not effectively meet the sustainability objectives as well as those of Options 2 and 3, for example the access to healthcare, employment, education, community and recreational facilities do not score as high in Option 1 compared to the other alternatives. In addition, this option does not have the capacity to deliver a large quantum of high quality non-strategic housing where the need most arises.<br><br>4.16 Moreover, it is considered that Option 1 – and to an extent Option 3 – are simply presented purely to ensure optimum protection of the Bristol and Bath Green Belt. However, the four Authorities have acknowledged that the Green Belt will need to play a part in meeting identified market and Affordable Housing need.<br><br>4.17 On this basis, it is considered that Option 2 is the most appropriate Strategy for non-strategic growth. Under this option, new development will be located where the majority of housing need most arises. In addition, there is significantly better access to services and facilities. As noted above the site at Williams Close is located to a range of local amenities within walking distance.<br><br>4.18 Under Option 2 there is a reduced need to provide essential large-scale infrastructure compared to the dispersal approaches under Options 1 and 3, which would simply not present a feasible alternative. When compared with the other options for non-strategic growth, Option 2 provides a greater opportunity for encouraging more sustainable transport choices.<br><br>4.32 In summary, the South Gloucestershire LP must identify sites which are well related to the Bristol urban area in helping meet the city's housing needs, and the Emerging Spatial Strategy of the LP is crucial in ensuring this is achieved. For the reasons set out above, it is therefore considered that Option 2 be the most appropriate Strategy to take forward via the LP process. |
| **Attached documents** | Development Management - Tetlow King Planning (Sean Lewis).pdf (5.3 MB) |

| | |
|---|---|
| **Respondent Name** | Fortannia Ltd |
| **Comment ID** | 19741217/2323 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | ***3.2 Select one option that we should use to investigate sites for non-strategic growth?***<br><br>***i. Option 1 (Outside the Green Belt); or***<br><br>***ii. Option 2 (Inside the Green Belt); or***<br><br>***iii. Option 3 (Both Inside & Outside the Green Belt)*** |

| | |
|---|---|
| | It is sensible for Option 3 to be applied in the identification of alternative sites and development. Without a doubt, development restrictions placed upon settlements in the Green Belt has curbed their ability to respond to development pressures and opportunities elsewhere. It is sensible for development to be channelled to settlements in the Green Belt (such as Alveston) and elsewhere when, for example, there are no clear available, suitable and deliverable sites within the built-up area and sensitive additional development can be accommodated.<br><br>Further, there are other settlements outside of the Green Belt which also have development potential but have not been allowed to expand by virtue of Countryside Policy. It is an appropriate time for new development proposals to deliver homes and other facilities in settlements aimed at supporting their vitality. It should be remembered that the Draft JSP (which has been prepared and agreed between four Authorities including South Gloucestershire Council) has been drafted on the basis that the gap between disadvantaged and other communities is to be closed during the Plan Period – but this cannot be achieved through a Plan which ignores the development potential of all settlements regardless of their location within or outside of Green Belt.<br><br>It is noted at Appendix 3 of the Consultation SGLP that SGC will consider whether detailed Green Belt Assessments are necessary to assess places in or adjoining Green Belt. This is welcomed – however, the robustness of the Stage 1 and Stage 2 Green Belt Assessments for the JCS must be tested first. Any further local Green Belt Assessment work should be founded on sound evidence. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Redrow Homes South West, Julia Wallington, Debra Turner, Andrew Williams, Chr... |
| **Comment ID** | 20167105/2344 |
| **Document Part Name** | Question 03.2 Select one option that we should use to investigate sitesfor non-strategic growth? |
| **Comment** | 8.24 We consider that Option 3 is the most credible as this looks at both Green Belt and non-Green Belt locations to accommodate development and is likely to result in the most sustainable sites being selected for development, such as Land North of Iron Acton Way in Yate. We would suggest that small settlements with few or no facilities, and those without suitable transport links, are discounted for any development proposals above 10 dwellings. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Chris Stow |
| **Comment ID** | 877825/9 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Apart from the rural places identified in the Plan there must be quite a large number of small settlements, without a Settlement Boundary, throughout the Plan area that could accommodate some modest housing growth. There must be a case for allowing discrete infilling as long as the infilling reflects the existing properties with respect to garden size, house types etc. There should also be scope, within these settlements, for smaller sites able to accommodate 1 to 10 houses but at a density that reflects the style of the existing properties rather than a dogmatic '10 homes to the 0.5 hectare' approach mentioned. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Becky Elderton |
| **Comment ID** | 19140513/19 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Brownfield and infill. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | E. Felton |
| **Comment ID** | 19310689/31 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Option 1 is preferred since this avoids the need to consider releasing Green Belt land. The NPPF (March 2012) makes clear that the Government attaches great importance to Green Belts. Paragraph 81 of the Framework also advises that once Green Belts have been defined LPAs should plan positively to enhance the beneficial use of such land and once boundaries have been established they should be altered only in exceptional circumstances. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Irminka Rowe |
| **Comment ID** | 19343681/40 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Green Belt must be preserved at all costs. The fact that the Council are wanting to build on land that children and families play, dog walking areas etc is disgusting. Hanham is a beautiful area and there doesn't seem to be consideration to using more Brownfield sites, I believe this is due to it potentially being trickier than just wiping out a large green area along with its wildlife. I'm simply appalled, but let's be honest the decision has already been made hasn't it! |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Richard Rogers - Olveston Parish Council |
| **Comment ID** | 1060833/86 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Olveston Parish Council have no Comment to make on this Question. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Claire Normoyle |
| **Comment ID** | 7883105/112 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | No Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anne Gale |
| **Comment ID** | 16344321/124 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Not rural. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Thompson |
| **Comment ID** | 17795873/165 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | I am not aware of any. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christopher Tippetts |
| **Comment ID** | 19452065/181 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Tortworth would be an ideal location for a Garden Village. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Philip Box |
| **Comment ID** | 19453025/194 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | The combination of rural places that should be investigated (For non-strategic development potential) should be focused away from historic, remote and picturesque small villages, for whom even very small development may have a substantially negative impact on their historic character and environment. Both Brownfield potential and empty home regeneration should both be clearly utilised and explored before any "Greenfield" development potential is even considered. This would favour locations on the rural urban fringe, such as Warmley.<br><br>This preference for Brownfield must be made consistently throughout the Plan, and is not made adequately here.<br><br>This would help it fit better with the overarching emphasis on Brownfield in the JSP, and in the Government's proposed Housing Reforms in the NPPF and through the Housing White Paper.<br><br>A clearer, "Brownfield orientated" approach to site allocation and investigation would not only fit better with national Policy initiatives and direction, but also help provide greater market certainty regarding the viability and desirability of such initiatives. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Gillian Sanders - Wessex Water |
| **Comment ID** | 19455361/232 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |

**Comment**

The Draft Local Plan reiterates the JSP's requirement for 1,300 new homes in the rural areas of South Gloucestershire with a potential contingency of 500 further new homes. The combination of areas selected will determine the quantity of homes in each rural area. It is currently assumed that the increase in housing per area selected will be within a range of approximately 10 - 25 percent.

Wessex Water is the sewerage undertaker for the South Gloucestershire area. Foul water capacity assessments for the areas will consider available sewage treatment and sewer pipe capacity.

A number of "rural" South Gloucestershire areas drain to Wessex Water's large water recycling centre at Avonmouth. Sewage treatment capacity will be available for new development in these areas as outlined in the Table below.

| Villages Discharging to Avonmouth Water Recycling Centre |
|---|
| Iron Acton |
| Longwell Green |
| Mangotsfield |
| Old Sodbury |
| Oldland |
| Shortwood |
| Warmley |
| Westerleigh |
| Winterbourne |

The remaining South Gloucestershire rural areas identified drain to small rural water recycling centres. The Table below shows where investment will be required to accommodate potential growth at these smaller works. Where sewage investment is not planned in these areas during our next Planning Period (2020 - 25) it is recommended that development is allocated later in the Local Plan period to ensure environmental standards are maintained.

| Place | Water Recycling Centre (WRC) | Current capacity availability and comments | | |
|---|---|---|---|---|
| | ? 10% | ? 25% | Treatment capacity not available if both areas were to increase in population by 25% | |
| Almondsbury | Almondsbury | YES | YES | |
| Hortham Village | Almondsbury | YES | YES | |
| Almondsbury & Hortham | Almondsbury | YES | NO | |
| Alveston | Alveston | YES | NO | Treatment capacity not available if Alveston or both areas were to increase in population by 25% |
| Rudgway | Alveston | YES | YES | |
| Alveston & Rudgway | Alveston | YES | NO | |
| Cold Ashton | Cold Ashton | YES | YES | |

| | | | | | |
|---|---|---|---|---|---|
| | Cromhall | Cromhall | YES | YES | |
| | Rangeworthy | Cromhall | YES | YES | |
| | Tytherington | Cromhall | YES | YES | |
| | Falfield | Leyhill | YES | NO | |
| | Marshfield | Marshfield | NO | NO | |
| | Pucklechurch | Pucklechurch | YES | NO | |
| | Old Down | Tockington | YES | YES | |
| | Olveston | Tockington | YES | YES | |
| | Tockington | Tockington | YES | YES | |
| | Old<br>Down, Olveston & Tockington | Tockington | YES | NO | Treatment capacity not available<br>if these three areas were to increase in population by 25% |
| | Wick | Wick | YES | YES | |
| | Wickwar | Wickwar | NO | NO | |
| | | | | | |

The public sewer network is dendritic with smaller diameter sewers on the periphery of catchments increasing in size to accommodate more connections. Network reinforcement will be dependent on the location, size of the proposed development and the capacity of the receiving network. Engineering appraisal will be progressed once development sites are allocated. Network reinforcement will be funded by the infrastructure charge. Early visibility of construction start dates will ensure any upgrades are made through Planning investment and resources at the appropriate time to reduce the risk of sewer flooding and pollution.

The Spatial allocation of development sites within rural areas will be subject to Policies on Odour Risk (proximity to water recycling centres), sustainable surface water disposal and existing Flood Risk from rivers, surface and groundwater.

There are areas in South Gloucestershire where high levels of groundwater can lead to sewer flooding. We will need further Consultation on the areas highlighted to ensure that development is not allocated in these high risk areas without further assessment and agreement of mitigation measures. The high risk areas are:

- Oldbury on Severn
- Cromhall
- Tytherington
- Rangeworthy

| | |
|---|---|
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Peter D. Box |
| **Comment ID** | 19453441/241 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Most of the locations considered in the non-strategic sites lie within the existing Green Belt or in the designated Cotswold ANOB.<br><br>Many are a considerable distance from existing centres of employment and from new Enterprise Zones and Business Parks identified in the WoE JSP. These include Cold Ashton, Cromall, Falfield, Hawkesbury Upton, Horton, Marshfield, Old Sodbury, Rangeworthy, Tytherington and Wickwar. Not one of these sites is served by a Public Transport system which could provide an efficient, effective and carbon neutral means of conveying residents to centres of employment in urban areas. Residents would therefore rely on their own transport, i.e. the motor car. Thus proceeding with such developments as proposed in the SGLP would inevitably lead to increased emissions of exhaust gases, mostly CO2 and NO2. |

| | |
|---|---|
| | The UK is currently committed to EU Legislation designed to reduce emissions (http://ec.europa.eu/environment/air/quality/standards.htm), and after Brexit, these regulations will be transposed into UK Statutes. The SGLP proposals will therefore be seen as contravening these regulations and jeopardising the UK's reputation as a leader in the campaign against Climate Change.<br><br>Further, I note that in Section 2.50 a statement is made that 500 houses are equivalent to 25 hectares: i.e. 20 houses per ha. Examining the Brownfield Registers for the four Counties within the WoE region, I obtain a total registered area of 524 ha corresponding to a MINIMUM total of 16,014 houses: i.e. a density of 30 houses per ha. This suggests that SG is being somewhat generous in its allocation of Greenfield land. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Louise Seaman - Mactaggart & Mickel |
| **Comment ID** | 19457953/274 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | No, we believe Frampton Cotterell represents an acceptable and sustainable location to accommodate further development. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Emma Jarvis |
| **Comment ID** | 2745345/282 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Yes, there are other combinations of rural villages and clusters of housing outside of Settlement Boundaries where you are able to walk to local village Schools, to local major employers, to shops, to community facilities which should be investigated. The inclusion of Acton Turville, Aust, Badminton, Hallen, Tortworth and Leyhill should be reconsidered on this basis.<br><br>The villages of Acton Turville, Badminton, Hallen and Tortworth* are all next to existing main railway lines and have had their own railway stations in the past which could be considered for reopening to improve the Public Transport provision and sustainability of these locations(*Charfield Station near Tortworth as in JTS).<br><br>See my Responses to Question 3.1 for rationale. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | B. Gardener-Wollen |
| **Comment ID** | 19466977/318 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Include all 55 villages and spread the houses equally with lots of small developments **not** major developments of 10 or more dwellings at a time. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Hicks - Falfield Action Group |
| **Comment ID** | 16618369/327 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Rural villages and clusters of housing outside Settlement Boundaries should be given more weight, especially where residents can walk/cycle to village Schools and employers. Less weight should be given to rural locations that do not have these within walking or cycling distance.<br><br>More weight should be given to locations that have the potential for future rail connections. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Jill White |
| **Comment ID** | 10710785/384 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Earthcott. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mark Roper - T. Roper & Partners |
| **Comment ID** | 19467489/394 |

| | |
|---|---|
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | An approach to identifying an area for non strategic growth should start with those rural areas with an already established infrastructure regarding local amenities and travel links.<br><br>Whilst impact on the rural Green Belt surrounding rural settlements seems to be of major concern, consideration should be given that the continuing 'infilling' of open spaces within the rural settlements has had a severe impact on the openness and visual impact on these settlements and as such the continuation of this would be more detrimental to rural areas than sympathetic small developments on the outskirts.<br><br>Also rural economies should be of high priority when selecting a Plan for non-strategic growth, by this I mean that there will be an inevitable financial gain for landowners and developers for any house building development, the fashionable developments of today, even in rural areas surrounding settlements, seem to be of the large kind within one location by one large developer.<br><br>I suggest the identification on many smaller sites rather than one large area would mean multiple landowners would benefit including many small agricultural businesses that would allow much needed reinvestment and security,thus securing future rural land management.<br><br>The smaller development sites would then mean multiple smaller 'local' building contactors could cope with the construction.<br><br>This approach would more or less guarantee that a high percentage of the investment required to build new homes would remain in the local economy which should always be a high priority to local Council projects.<br><br>Smaller developments would also have less visual impact and be a lesser nuance to neighbouring properties. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Simmons - Westerleigh Parish Council |
| **Comment ID** | 17221409/402 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | **3.3. Do you think there are other combinations of rural places we should investigate for non-strategic growth?**<br><br>**WPC considers that SGC are considering ALL rural places already as shown in Appendix 1.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alveston, Rudgeway, and Earthcott Parish Council |
| **Comment ID** | 19784545/433 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | **No** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Peter Rawlinson - Gleeson Strategic Land Limited |
| **Comment ID** | 19328353/451 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | The sustainability credentials of each settlement should be used to identify a hierarchy among the rural settlements. The most sustainable settlements should be the preferred options for growth. Very small settlements are unlikely to have the services and facilities necessary to accommodate additional non-strategic growth.<br><br>Gleeson suggests that the flexibility adopted in considering Green Belt sites should also be extended towards areas with other high level constraints such as the Cotswold AONB. The Council recognises that in order to secure the benefit of new development for rural communities it is appropriate to include places in the AONB. Gleeson agrees with and supports this approach. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alan Jones - Hanham District Green Belt Conservation Society |
| **Comment ID** | 17236353/504 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | 3.3 Any Other Combinations Requiring Consideration: |

| | |
|---|---|
| | Detailed review of derelict and vacant industrial units throughout South Gloucestershire. |
| **Attached documents** | Hanham District Green Belt Conservation Society (Alan Jones).pdf (20.3 MB) |

| | |
|---|---|
| **Respondent Name** | Daphne Dunning - Cromhall Parish Council |
| **Comment ID** | 16475073/605 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | 3.3<br><br>The Council questions why the Woodlands Garden Village proposal was dismissed. The Council suggested a similar site location for development in our JSP Response of 18 months ago. It makes more sense than Buckover Village as Woodlands is close to existing infrastructure. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Zoe Hancock - Bristol Avon Catchment Partnership |
| **Comment ID** | 19832225/677 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | The Draft Local Plan reiterates the JSP's requirement for 1,300 new homes in the rural areas of South Gloucestershire with a potential contingency of 500 further new homes. The combination of areas selected will determine the quantity of homes in each rural area.<br><br>The BACP is keen for South Gloucestershire Council to incorporate and embed the importance of the functioning, healthy river catchments within the new growth areas. The rural locations will provide many opportunities to connect local communities with the surrounding nature, thus benefitting from all of the health and wellbeing benefits associated with living close to a high quality environment and water. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mark Williams |
| **Comment ID** | 19729473/721 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Option 3 considers the widest possible range of settlements and urban fringe locations, therefore, it is not considered that an alternative combination of locations would be appropriate.<br><br>The Council should, in identifying locations for development, start the search from the widest possible scope, from which locations with an appropriate range of services and facilities to meet local needs in a sustainable manner should be selected. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | James Carpenter - Falfield Parish Council |
| **Comment ID** | 16617825/741 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | More weight should be given to rural villages and clusters of housing outside of settlement boundaries where you are able to walk to local village Schools or to local major employers in the selection of villages for assessment and less weight given to those that depend on travelling further afield for these facilities. See our rationale in response to Question 3.1.<br><br>More weight should be given to the potential for future public rail transport connections. Some of the villages not selected for investigation are adjacent to existing main railway lines, some still have their own railway stations and platforms (albeit currently closed) which could be considered for reopening to improve the Public Transport provision and sustainability of these locations. See our rationale in response to Question 3.1. |
| **Attached documents** | Falfield Parish Council (Mr. James Carpenter).pdf (1.9 MB) |

| | |
|---|---|
| **Respondent Name** | Sovereign Housing Association |
| **Comment ID** | 16477825/776 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Given that the approach in Option 3 considers the widest possible range of settlements and urban fringe locations, it is not considered that an alternative combination of locations would be appropriate.<br><br>The Council should, in identifying locations for development, start the search from the widest possible scope, from which locations with an appropriate range of services and facilities to meet local needs in a sustainable manner should be selected. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Heather Elgar - West of England Nature Partnership |
| **Comment ID** | 19839553/789 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Please find below Comments from the West of England Nature Partnership (WENP) in response to the South Gloucestershire Local Plan Consultation.<br><br>For transparency, please know that Dominic Mellon (Consultant in Public Health for South Gloucestershire Council) sits on the WENP Board and thus note a declared conflict of interests. This Response reflects the aims and objectives of the Partnership and does not reflect views of individual Board members.<br><br>Question 3: Non-strategic Growth:<br><br>WENP recommends that development should happen on the least ecologically valuable land, and where it promotes sustainable modes of living. Ecologically valuable land may often, but does not necessarily, fall in the Green Belt. As such, WENP recommends that the principles of safeguarding ecological assets (identified through Strategic Green Infrastructure Planning) and facilitating sustainable modes of living (as demonstrated through the principles of 'Urban Living,' or indeed the 'Dutch model' cited on P. 48) should come before the preservation of the Green Belt. WENP recognises the importance of the Green Belt for place shaping, and recommends that the Green Belt is avoided, after first considering the ecological value and sustainability of locations.<br><br>Possible locations should be identified through a Strategic Environmental Needs Assessment (as part of, or alongside, the West of England Green Infrastructure Plan) to ensure that land does not become locked in for development which could more valuably form part of a strategic and resilient Green Infrastructure Network that benefits both people and nature.<br><br>AONBs are important ecological areas and WENP is concerned by any major Plans to develop there. As stipulated in the National Planning Policy Framework, development in AONBs should be avoided unless in exceptional circumstances. We would question that there are exceptional circumstances to justify development there at this stage. Any development that does come forward in the AONBs – or indeed any ecologically sensitive area – should be respectful of the landscape and strategic green infrastructure, and its impact appropriately mitigated for in line with the Government's ambition for a net gain in natural capital as laid out in the 25 Year Environment Plan. WENP expects that such principles and strategic green infrastructure will be laid out in the West of England Green Infrastructure Plan, as well as mechanisms to enable appropriate mitigation, and that these will be carried forward into the Local Plan. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | SPM Homes Ltd |
| **Comment ID** | 19732097/822 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | **Non-Strategic Growth:**<br><br>3.3 Do you think there are other combinations of rural places we should investigate for non-strategic growth? (please state which places and rationale)<br><br>No; The proposed search areas within the Green Belt appear logical and appropriate. Although the villages need to be subject to some form of ranking to aid the allocation process and guide development to the most sustainable locations. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Howard Owen - Cleve RFC |
| **Comment ID** | 19732321/914 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Given that the approach in Option 3 considers the widest possible range of settlements and urban fringe locations, it is not considered that an alternative combination of locations would be appropriate.<br><br>The Council should, in identifying locations for development, start the search from the widest possible scope, from which locations with an appropriate range of services and facilities to meet local needs in a sustainable manner should be selected. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Robin Pearce - Ivywell Capital Ltd |
| **Comment ID** | 19998625/962 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | 18) AK considers there to be little value in exploring further options beyond the three already articulated. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David Moodie |
| **Comment ID** | 19732737/980 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Please see supporting Representations Document and Call for Sites Submission. |
| **Attached documents** | Mr. David Moodie - Fisher German LLP (Ms. Angela Smedley).pdf (578 KB) |

| | |
|---|---|
| **Respondent Name** | Eric Heath - Avon Wildlife Trust |
| **Comment ID** | 19883713/996 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | AWT recommends that development should be targeted on the least ecologically sensitive areas. Ecologically valuable land is not restricted to the Green Belt and AWT therefore recommends that sites are judged on their ecological merits rather than Green Belt designations.<br><br>The Draft Local Plan reiterates the JSP's requirement for 1,300 new homes in the rural areas of South Gloucestershire with a potential contingency for 500 further new homes. In the background to this the Government's 25 year Environmental Plan has recently been published and makes a commitment to be the first generation to leave the environment in a better state than we found it. To achieve this we need to put the natural environment at the heart of development and Planning. Our vision for South Gloucestershire is one that enables wildlife to be part of our everyday lives. To achieve this new housing developments need to be built in the right way and in the right location, and in this way they can make a positive contribution to nature and the health and wellbeing of residents. The Wildlife Trusts have recently published guidelines that show how new housing developments can be built in a way that provides people with greener, inspirational homes which help to reverse Decades of wildlife and habitat decline. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Cate Davidson - Sodbury Town Council |
| **Comment ID** | 4877793/1008 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Dear Planning Team,<br><br>Sodbury Town Council responds as follows to the Local Plan (non strategic) Consultation:<br><br>Q. 3:<br><br>3.3 STC does not feel it should Comment on areas outside of the Parish.<br><br>Please note the Comments as appropriate. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hannah Spanton - Badminton Estate |
| **Comment ID** | 19884225/1030 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | The Badminton Estate is a significant landowner within the District and in addition owns a considerable number of buildings and farms, of which many are Listed. The Estate also brings a significant number of benefits to the rural area including those economic benefits associated with farming, tourism, equestrian uses and the Horse Trials which provides local employment and stewardship for the land and buildings.<br><br>Many older farm buildings are now redundant of their former use. These traditional buildings make up an important part of the Estate's heritage as well as an intrinsic part of the rural character of the area. The majority of these buildings are suitable for re-use to either residential or business uses. With Permitted Development Rights and Change of Use Applications these clearly make up a valuable and useful supply of new housing for rural areas. The Local Plan should encourage this type of development within rural areas.<br><br>By considering what opportunities there are for pockets of growth in the villages and rural settlements which the Estate surrounds will not only preserve and enhance the vitality of these settlements but also ensure the longevity of the Estate over the long-term by allowing sensitive development and building additional houses as it has done throughout its history which has resulted in many of the villages and Conservation Areas within South Gloucestershire today.<br><br>As a result, the villages of Acton Turville, and Tormarton should be considered as sustainable and suitable for development. Emerging Policy should also make it simpler and quicker for landowners to convert existing buildings to other uses. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Robin Pearce - Bristol & England Properties |
| **Comment ID** | 19884417/1074 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | 18) AK considers there to be little value in exploring further options beyond the three already articulated. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Clifton Homes Ltd |
| **Comment ID** | 16617921/1083 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | **Please see submitted Representations.** |
| **Attached documents** | Clifton Homes Ltd - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (1.7 MB) |

| | |
|---|---|
| **Respondent Name** | Barwood Development Securities Ltd and The Thornbury Landowner Consortium |
| **Comment ID** | 19884545/1095 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Please find attached Representation. |
| **Attached documents** | Barwood Development Securities Ltd and The Thornbury Landowner Consortium - Savills (Miss. Felicity Tozer).pdf (650 KB) |

| | |
|---|---|
| **Respondent Name** | South West Strategic Development and Ian and David Knipe |
| **Comment ID** | 19884577/1107 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Please see submitted Representations. |
| **Attached documents** | SW Strategic Development and I. and D. Knipe - Grass Roots.pdf (27.4 MB) |

| | |
|---|---|
| **Respondent Name** | Progold Ltd |
| **Comment ID** | 19737665/1121 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Please see submitted Representations. |
| **Attached documents** | Progold Ltd - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (7.9 MB) |

| | |
|---|---|
| **Respondent Name** | Bovis Homes Limited |
| **Comment ID** | 20044801/1202 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Please refer to enclosed letter. |
| **Attached documents** | Bovis Homes Limited - Rapleys LLP (Mr. Tony Clements).pdf (259 KB) |

| | |
|---|---|
| **Respondent Name** | Helen Johnstone - Stroud District Council |
| **Comment ID** | 14317537/1223 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | No Comments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Messrs Keller, Grace, Moorlen and Barnes |
| **Comment ID** | 19889409/1238 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Part 1 (Housing Requirements) and Part 2 (Spatial Strategy) including Questions 1, 2, 3 and Strategic Development Locations: |

| | |
|---|---|
| | Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Messrs Keller, Grace, Moorlen and Barnes - Pegasus Group (Mr. Daniel Weaver).pdf (423 KB) |

| | |
|---|---|
| **Respondent Name** | Conor Lee - Hannick Homes |
| **Comment ID** | 11945985/1317 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | 10) AK considers there to be little value in exploring further options beyond the three already articulated. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | ATA Estates (Longwell Green) LLP |
| **Comment ID** | 19740449/1409 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Please see the enclosed Representations in respect of the Local Plan Consultation Document (February 2018). Please note that separate Representations are being submitted in respect of the Consultation on the 2018 Sustainable Access Methodology and the associated Sustainable Access Profiles. |
| **Attached documents** | ATA Estates (Longwell Green) LLP - Walsingham Planning (Mr. Daniel Sharp).pdf (59.8 MB) |

| | |
|---|---|
| **Respondent Name** | Fear Group |
| **Comment ID** | 19927745/1425 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | As set out above, we consider that the identification of Bitton as a place to be investigated for NSD should be amended to Bitton and Upton Cheyney. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Reginald Pearce, Judith Davis & Rachael Shiles |
| **Comment ID** | 19740897/1480 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | 18) AK considers there to be little value in exploring further options beyond the three already articulated. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | The Engine Common Trustees (ECT) |
| **Comment ID** | 19741409/1562 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Given the choice of Option 3 in Q. 3.2 above, then no further Comment is made other than the Comments in Q. 3.1. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | M. S. Howes |
| **Comment ID** | 19741377/1573 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Given the choice of Option 3 in Q. 3.2 above, then no further Comment is made other than the Comments in Q. 3.1. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Rockfield Farms Limited (RFL) |
| **Comment ID** | 20069217/1587 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Given the choice of Option 3 in Q. 3.2 above, then no further Comment is made other than the Comments in Q. 3.1. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Downend Estates Limited (DEL) |
| **Comment ID** | 1463137/1598 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Given the choice of Option 3 in Q. 3.2 above, then no further Comment is made other than the Comments in Q. 3.1. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Taylor Wimpey |
| **Comment ID** | 20068353/1652 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Notwithstanding the Comments above about the need to increase the level of housing overall, we have no further Comments about potential additional rural places at this time. We support the identification of Land at Mangotsfield as a location to accommodate non-strategic growth within the rural areas. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | E. H. Schubert Will Trust |
| **Comment ID** | 12403425/1674 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Within Appendix One, locations are listed which have been assessed for non-strategic growth. Aust is listed as a potential location. Aust is a small settlement of approximately 532 (2011 Census) located to the South of Junction 1 of the M48, and predominantly East of the A403. It has a Settlement Boundary. The area is mostly located within Flood Zone 3 but is protected by Flood Defences along the River Severn, which will be improved further in the near future, with the creation of reinforced sea walls, raised banks and sheet pile walls between Aust and Avonmouth. These defences will protect from sea flooding events with a 0.5% chance of occurring, or river flooding events with a 1% chance of occurring.<br><br>Whilst Aust is within the Green Belt, it is a location that is proximate to local services and some employment opportunities.<br><br>We consider Aust should be considered as a potential area for low level non-strategic growth. Its Settlement Boundary should be reviewed (to include Land at Villa Farm) and through this Applications for development supported fully by evidence relating to Flood Risk and its mitigation should be submitted and considered. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David Jonathan Redgewell - TSSA, Bus User UK, South West Transport Network |
| **Comment ID** | 20189249/1783 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Welcome new homes on the A38 Public Transport Corridor at Alveston, Almondsbury, Rudgeway.<br><br>The Policy fails to address Key Service Villages such as Alveston, Falfield, Frampton Cotterell and Winterbourne, Marshfield, Wick, Pucklechurch, Charfield, Wick, Olveston.<br><br>The Council needs to address Local facilities, Public Houses, Schools, Post Offices, Garages, Banks, Village Hall, employment and Develop a Service Village led approach Like North Somerset or BANES. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hydrock Consultants Ltd and Mojo Active Ltd |
| **Comment ID** | 19740577/1791 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | We support the Council's proposal to investigate sites both Inside and Outside of the Green Belt through Option 3. We do however wish to raise Comments in relation to the Hydrock and Mojo site, which falls within the Green Belt and would offer non-strategic employment growth. We consider that the Over Court Farm site should be excluded from Green Belt designation to foster economic growth and development of Hydrock and Mojo. Each element of the site is considered further below:<br><br>*Over Court Barns:*<br><br>*This part of the site includes a series of farm buildings, converted to offices, and hardstanding used for car parking. The site is therefore a previously developed site within the Green Belt. As set out in the revised Draft National Planning Policy Framework (NPPF), when considering Green Belt release, Local Planning Authorities should first consider land which has been previously developed (Paragraph 137). This paragraph is amended from the original version of the NPPF and demonstrates that the Government is seeking to place greater emphasis on the re-use and intensification of Brownfield sites, including those that are currently designated Green Belt. The removal of Over Court Barns from the Green Belt* |
| **Attached documents** | |

| | |
|---|---|
| | *designation will allow for comprehensive consideration of the Business Plan and Accommodation Strategy in this headquarters location to support the growth of the national Hydrock business.*<br><br>*Land Around Over Court Farm:*<br><br>*Fields adjacent to Over Court Barns are used by Mojo for their outdoor activities. This includes an outdoor assault course, archery, low ropes and high ropes in the Withy Bed (all subject to separate Planning Consents). Together these activities have established the Mojo business in this location, however, Mojo are limited to sharing welfare facilities, WCs and showers with the Hydrock site. This is not sustainable in the long term as both businesses grow given the different nature of each business use. On this basis, we consider that land around Over Court Farm should be specifically identified for leisure use in the Green Belt.*<br><br>*Tall Trees Site:*<br><br>*The Tall Trees site comprises approximately 0.5 ha of land, formerly used as a gypsy/traveller site, known as 'Tall Trees.' The site was cleared in 2015 and now comprises an area of hardstanding. The majority of the site is defined as previously developed land. The boundaries of the site are defined by hedgerow and fencing, and a red brick wall at the entrance. The site sits higher than the road level and is therefore screened from the road. Access is gained from Over Lane. This site is Brownfield land, currently falling with the Green Belt. Given that it falls within the same ownership as Over Court Farm, options are being explored for how the site could be used to support the growth of the Hydrock and Mojo businesses. However, the current Green Belt designation inhibits opportunities to make the optimum use of the site for employment or leisure use. The site is considered against the purposes of the Green Belt below:*<br><br>- **To check unrestricted sprawl of large built-up areas**: the site is previously developed land, which does not fall adjacent to the Bristol urban area. Greater defined boundaries to the Green Belt are currently provided by the M5 Motorway. It therefore has a limited role in restricting sprawl of built up areas.<br><br>- **To prevent neighbouring towns merging into one another**: the site falls between Easter Compton, Almondsbury and the Northern edge of Bristol, around 220 metres South West of Over village. As an existing modest Brownfield site, it has a limited role in preventing these settlements from merging into one another.<br><br>- **To assist in safeguarding the countryside from encroachment**: the site is surrounded by agricultural and leisure uses, therefore, it does assist in safeguarding the countryside from encroachment. However, as a Brownfield site, it should be accepted that some development will come forward on the site and this development would be assessed through normal Planning and Development Management Policies. Therefore, we would question the benefit of including the Tall Trees site in the Green Belt when releasing the site to be assessed under normal Planning Policies would allow for the optimum development of the site, cognisant of its rural context, to be achieved.<br><br>- **To preserve the setting and special character of historic towns:** the Joint Spatial Plan Green Belt Assessment (November 2015)highlights that the Cell containing Tall Trees does help to preserve the setting of Almondsbury village. However, when considering Tall Trees alone, the site is not located in proximity to Almondsbury and Ibstock Brickworks falls between the site and Almondsbury. On this basis, the site has limited value in preserving the special character of Almondsbury.<br><br>- **To assist in urban regeneration, by encouraging the recycling of derelict and other urban land**: as above the site is not adjacent to an urban area, therefore, it has limited value in assisting regeneration of these areas. However, omission of the site from the Green Belt would allow for the redevelopment of an underused Brownfield site to support a local business. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mr. and Mrs. Drew and Mrs. S. M. Bennett |
| **Comment ID** | 19722081/1886 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | No Option 1 is clearly the preferred approach. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tony England |
| **Comment ID** | 20208833/1908 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Please see Representations Document enclosed. |
| **Attached documents** | Mr. Tony England - Barton Willmore.pdf (12.5 MB) |

| | |
|---|---|
| **Respondent Name** | JFG Gunnery |
| **Comment ID** | 19741793/1975 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | In the consideration of rural places, Elberton should be considered suitable for further non-strategic development.<br><br>Elberton is a settlement which the Local Authority has reviewed and presented under a Sustainable Access Profile. We highlight that the profile is inaccurate in relation to its accessibility to schools. Both Olveston C. of E. Primary School and Marlwood School are within the respective 2 and 3 |

| | |
|---|---|
| | mile radius distances outlined in the aforementioned Profiles. Furthermore, a Doctor's Surgery is at Olveston and within around 800m of the site being presented by our Client.<br><br>Elberton presents a sensible opportunity for new housing to support further rural services and infrastructure. The Council should consider, in detail, rural development requirements and reflect this through new Planning Policies. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alex Atkinson - Edward Ware Homes (Land East of the A4174, Shortwood) |
| **Comment ID** | 19323937/2100 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Edward Ware Homes (Mr. Alex Atkinson) - Pegasus Group (Mr. Daniel Weaver).pdf (2.6 MB) |

| | |
|---|---|
| **Respondent Name** | Alex Atkinson - Edward Ware Homes (Land at Woodhouse Down, Almondsbury) |
| **Comment ID** | 20248001/2121 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Edward Ware Homes (Mr. Alex Atkinson) - Pegasus Group (Mr. Daniel Weaver).pdf (14.4 MB) |

| | |
|---|---|
| **Respondent Name** | Crest Strategic Projects & Crest Nicholson (South West) Limited |
| **Comment ID** | 20274273/2172 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | 19) AK considers there to be little value in exploring further options beyond the three already articulated. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Land at Bromley Heath Landowners |
| **Comment ID** | 20293793/2194 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | 20. AK considers there to be little value in exploring further options beyond the three already articulated. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Strategic Land Partnerships/ Mr. S. Jarrett |
| **Comment ID** | 20312833/2208 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | 21) AK considers there to be little value in exploring further options beyond the three already articulated. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ashfield Land |
| **Comment ID** | 16658689/2273 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | 4.10 As we have already established in Section 3 of these Representations, market signals suggest that large uplifts in housing requirements are required within Bristol City, with more modest uplifts also required in SGC and NSC. It would make sense that, as this unmet need is arising from Bristol City, any proposals to meet this displaced need attempt to do so as close to the City boundaries as possible.<br><br>4.11 As we set out in Section 3 we consider that in addition to meeting the unmet need arising from Bristol City the Local Plan needs to deal with an uplift in housing numbers of circa 4 - 5,000 dwellings now to respond to market signals. The majority of this should be provided as part of Strategic Development Locations (SDL) to be added into the JSP; however, there will also need to be a corresponding uplift in the non-strategic scale allocations proposed in the Local Plan to provide diversity in supply.<br><br>4.12 We would advocate that such a minimum uplift to the NSDL supply should be in the order of 1,300 - 2,000 dwellings, with potentially significantly more required once the apportionment of unmet need from Bristol City is decided upon. These additional housing numbers should be |

| | |
|---|---|
| | located in areas that have strong links to Bristol City, where demand is highest. Such locations include Hanham on the Eastern edge of the city and therefore we are pleased that it is being considered as an option for growth.<br><br>4.13 We will go on to explain how Hanham offers one such highly accessible location for housing growth (see Section 5) where the reliance on the private motor car can be reduced and thereby CO2 emissions arising from new development will be minimised. Such an approach to development would adhere to Paragraph 17(11) of the NPPF which requires development to *"Actively manage patterns of growth to make the fullest possible use of Public Transport, walking and cycling, and focus significant development in locations which are or can be made sustainable"* and Paragraph 30 which states *"In preparing Local Plans, Local Planning Authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport."*<br><br>***3.3 Do you think there are other combinations of rural places we should investigate for non-strategic growth?***<br><br>8.26 We have no Comment to make on this Question in respect to these Representations. |
| **Attached documents** | Ashfield Land - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (30.0 MB) |

| | |
|---|---|
| **Respondent Name** | Fortannia Ltd |
| **Comment ID** | 19741217/2324 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | ***3.3 Do you think there are other combinations of rural places we should investigate for non-strategic growth? (Please state which places and rationale)***<br><br>In the consideration of rural places, it is clear that Alveston presents a suitable and sustainable opportunity for development growth of a non-strategic scale. It is sensible that development should be in a location that is accessible. It is being enhanced further by extended Public Transport services and opportunities to use sustainable modes of transport and its close proximity to. This is where development in locations further away from key settlements will not deliver suitable and sustainable development – certainly in respect of road movements and transport. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Redrow Homes South West, Julia Wallington, Debra Turner, Andrew Williams, Chr... |
| **Comment ID** | 20167105/2345 |
| **Document Part Name** | Question 03.3 Do you think there are other combinations of rural places we should investigate fro non-strategic growth? |
| **Comment** | 8.25 We have no Comment to make on this Question in respect to these Representations. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Becky Elderton |
| **Comment ID** | 19140513/20 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Local Parishioners MUST have a say in any future plans for their Parish. The recent Tockington/Olveston Housing Needs Survey featured a staggering 62% vote against a RES (Rural Exception Site i.e. Green Field) being used for housing development. Therefore only Brownfield or Infill should be being considered (if anything at all) for this area. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | D. Hudd |
| **Comment ID** | 19272321/24 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | I refer specifically to the Pre-planning proposal for development of the current Green Belt land known as "The Batch' in Hanham. The proposal by on behalf of  ignores completely the fact that this land is already designated as Green Belt and seeks to remove its classification for development of up to 160 residential units. Hanham already has too many residents and cars for the local facilities to cope with and has a Brownfield site development already agreed on the previous Kleeneze site. It does not need to remove existing Green Belt land to meet its housing requirement. The local roads to this site are entirely inappropriate for the potential increased usage and the reports make no mention of the regular use of this land by local residents and deer. A development of this size in this location is entirely inappropriate in my opinion. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Robin Perry |
| **Comment ID** | 19309793/29 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Road congestion is a major issue that does not appear to be considered adequately. Public Transport links are not good and are extremely unlikely to improve in a manner that will prevent the increased use of private cars. Any growth in development, strategic or non-strategic should consider the ability of the Road Network to support an increase in traffic volume. The A38 for example is already extremely congested through Rudgeway |

| | |
|---|---|
| | to Thornbury (*at times it could be considered a linear car park*). The Strategic Growth Plan for Thornbury and Buckover Garden Village alone if implemented will make this congestion problem worse. Non-strategic develpment should be prioritised in areas where it is possible to access services, facilities and employment without the need to use the most congested roads. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anne Tyrer |
| **Comment ID** | 19338689/39 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Only sites where access to essential services are good should be considered - i.e. children should be able to walk to School, the Doctors, Dentist etc or traffic congestion in the villages will become even worse. There should also be good transport links to workplaces and shops - the roads in South Gloucestershire are already clogged with commuter cars. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Chris Stow |
| **Comment ID** | 877825/42 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | I believe there is a current, Plan wide Policy, that allows residential development within an existing residential curtilage subject to the property lying within an existing Settlement Boundary. As there is an obvious need for additional housing across South Gloucestershire it would seem sensible to allow residential development, within an existing residential curtilage, of properties that do not lie within a Settlement Boundary. Such a Policy would enable additional housing to be provided in the rural areas without affecting open countryside whether in the Green Belt or not. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Richard Hartill |
| **Comment ID** | 19376225/74 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | There are several proposals for development on Green Belt land in the Hanham area, including land on the Hanham Hills (the Cricket Club and land to the rear of Mount Pleasant Farm as examples). These developments would severely impact on the visual and recreational amenities available to a local population that has already accommodated a significant level of housing development in recent years. There would be a severe and catastrophic impact on local wildlife, which has already been badly affected by the Ring Road development and subsequent infilling for commercial and housing developments. There can be no justification for considering these sites when the large Brownfield site on the former Kleeneze site has been excluded from this exercise!<br><br>Any further significant development in Hanham will severely affect already overloaded transport and health infrastructure. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mr. Hawthorn |
| **Comment ID** | 14671265/80 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Hanham - The Plan refers to the sense of village feel. There are limited places that have such a feel. This should not be destroyed by imposing further residential development on the area. The ability for Hanham residents to walk to and enjoy these areas is cherished and the whole character of the area would be changed forever should development be permitted. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Richard Rogers - Olveston Parish Council |
| **Comment ID** | 1060833/87 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Sustainable Locations:<br><br>**Olveston Parish Council have reviewed the three Sustainable Access Profiles for Olveston, Tockington and Old Down. We assess the Profiles as broadly correct,** although we would like to offer the following Comments and clarification/updates (Please see Document 1).<br><br>**Olveston and Tockington -**<br><br>1. There is now a Public Transport service to and from Cribbs Causeway at weekends, albeit of limited frequency; 3 return journeys on each Saturday and Sunday. |

2. The local telephone exchanges of Almondsbury and Chipping Sodbury which cover the Parish are now Superfast Broadband enabled.

3. Using the definition on the Lists of Key Facilities Form, there are 4 Comparison Retail Stores within the 1,200m Walking & Cycling Distance from both villages i.e.

1. Clean Cut, hairdressers of The Street, Olveston.

2. Green Lane Garage, New Road, Olveston.

3. HDI Tuning, Hardy Lane, Tockington.

4. Vicarage Farm Holistic Therapy Centre, Vicarage Lane, Olveston who although majoring on beauty and massage treatments also have small retail sales of beauty products.

1. Again, using the definition provided, there are 3 Retail Stores within the 1,200m distance of each village being:

1. The Olveston Stores, a general store and Post Office in The Street, Olveston.

2. Crusty Loaf, bakers and confectionery sales The Street, Olveston.

3. Powells Butchers, New Road, Olveston.

**Old Down -**

There is now a dedicated walking/cycling route between Old Down and Alveston bringing St. Helen's CE VC Primary School in Alveston within the 2-mile limit and both Marlwood Secondary School, Alveston and Castle School in Thornbury within the 3-mile limit.

**Old Down does not fully satisfy the criteria for a sustainable location for development**. The Sustainable Access Profile for Old Down states that the settlement has minimal sustainable access to key services and facilities, citing one Public House within an 800 metre walking and cycling distance; no access within 800 metres to any community facilities, Post Office and any health facilities; no retail, food buying or Town Centre facilities within 1,200 metres; and no employment facilities within 2km.

Local Needs:

In 2015, after extensive work and community Consultation over two years, the Olveston Parish Vision was published. A copy is included with this Submission (Document 2).

The Parish Vision is the equivalent of a Parish Plan. The three issues of greatest concern to the community were traffic and parking, housing, and the future of local shops and businesses: these issues clearly relate to the new Local Plan objective of creating sustainable communities, reducing reliance on the car, providing housing to meet local needs and sustaining local services.

**In relation to housing, the views of the community can be summarised as: there is little or no requirement for more large executive style houses but a real need for more houses for first time buyers, including provision of some Affordable Housing for rent, and for housing for older households wishing to downsize but to continue to live in the Parish. The emphasis in the community Responses was on enabling small scale organic growth of the villages with the housing designed to respect their character**. A Housing Needs Survey has since been undertaken by South Gloucestershire Council (see below). Design issues are also addressed below.

In relation to local shops and businesses, many residents were concerned to see the shops survive in Olveston and had a view that more local jobs and small business should be encouraged.

Housing Needs Survey:

**A Housing Needs Survey was completed in Olveston Parish in May 2016**. A copy is included with this Submission (Document 3).

The response rate to the Survey was 52%, higher than average for this kind of Survey, and reflected a strong wish by residents to have a say in any future housing development in the Parish. A Working Group set up the Parish Council assessed the findings and made recommendations.

**The Survey confirmed the views expressed in the Parish Vision regarding community support for facilitating downsizing, starter homes if there is a local demand, and Affordable Housing if there is a proven need. At the time of the Survey there were Affordable Homes available to rent in the Parish and all were let: households were identified as having a need for Affordable Housing, with a further identified as potential need. All Affordable Housing needs were for 1 bed rented flats**. As to the location of any development, the majority of those completing the Survey prioritised development on Brownfield sites and infilling. With regard to Rural Exception Sites, 23.2% of those responding to the Survey supported the use of such sites while 61.6% were opposed.

Appropriate Scale of Development:

**The appropriate scale of any development must be agreed through a process of thorough and meaningful engagement with the relevant communities**. **We have noted the land identified through earlier Call for Sites. Large areas of land are included, which if developed would far exceed local needs and would far exceed what could be regarded as a proportionate increase in settlement size**. While the Call for Sites should inform the process of identifying locations for non-strategic allocations, it must not dictate the outcome.

**Where an adjustment of Green Belt boundaries may be required to accommodate limited development, no development should be permitted until revised Green Belt boundaries have been agreed, the Plan has been tested for soundness through independent Examination, and the Plan has been formally adopted by South Gloucestershire Council**.

Settlement Boundaries:

**To maintain confidence in the Plan and certainty in the Planning process, and to avoid speculative developer Planning Applications, the Settlement Boundaries of Olveston and Tockington should be retained, adjusted if necessary**.

Old Down does not have a Settlement Boundary and is "washed over" by the Green Belt. **In considering sustainable locations for non-strategic growth we concluded that Old Down does not fully satisfy the criteria. However, should it be selected for assessment and deemed appropriate for limited growth considering its small population, the Local Plan should include a Settlement Boundary to define the limits of any expansion**.

Ensuring that the character and local distinctiveness of our settlements is maintained, including the conservation areas in Olveston and Tockington:

**In 2004, after an extensive process of Consultation, the Parish of Olveston Design Statement was published**. A copy is included with this Submission (Document 4).

South Gloucestershire Council was asked that the Design Statement be formally adopted as Supplementary Planning Guidance. This was not accepted, the decision being as follows:

"That the Olveston Village Design Statement is endorsed by the Council as reflecting the local community's aspirations for the treatment of design issues in Olveston Parish, which will help to inform preparation of supplementary Policy by the Council and be treated as a material consideration in the determination of Planning Applications, but is not adopted as formal Supplementary Planning Policy."

The Statement was reviewed in connection with producing the Olveston Parish Vision in 2015 and was considered still to be sound but in need of updating in places: an addendum is being produced to accompany the Statement.

**Olveston Parish Council request that South Gloucestershire Council now adopt the Design Statement as a Supplementary Planning Document, to be linked to the new Local Plan.**

Both Olveston and Tockington have Conservation Areas. Olveston Conservation was designated in 1975 and extended in 2013. South Gloucestershire Council adopted a comprehensive Supplementary Planning Document (SPD) for the Conservation Area in 2013. The Tockington Conservation Area was designated in 1975 but does not yet benefit from a SPD. **It is noted that South Gloucestershire Council has a statutory duty to ensure that any proposed development will preserve and enhance the character and appearance of Conservation Areas and their setting. This is an important factor which must be taken into account in considering potential sites for development**.

Avoiding impacts on important landscape features, Biodiversity and Heritage Assets:

**Olveston Parish Council assume that this would be a given in any detailed Site Appraisals and that there would be ample opportunity for community input**. In relation to Biodiversity, Olveston Parish Council has recently launched a Biodiversity initiative under the title "Making Space for Wildlife." This aims to conserve and enhance Biodiversity and to ensure that new development is carefully planned to benefit Biodiversity.

Best and Most Versatile Agricultural Land:

| | |
|---|---|
| | Best and Most Versatile (BMV) Agricultural Land (Grades 1, 2 and 3a of the Agricultural Land Classification) is a strategic national resource and the NPPF requires Local Authorities to seek development on poorer quality land in preference to that of higher quality. **The ALC Map for the area shows a small area of Grade 1 land and more significant areas of Grade 2 (the two highest value categories): any development on this land should be ruled out**.<br><br>Next Steps:<br><br>Olveston Parish Council note that the next version of the Plan released for Consultation, along with supporting technical information will include:<br><br>• The places which form the Preferred Approach;<br>• Further information on places which form the Preferred Approach;<br>• Information on "deliverable" sites at each place; and<br>• Potential levels of growth at the places - and the sites this could take place on.<br><br>**In getting to this point, the Parish Council would welcome an opportunity to engage with the Planning Team as they assess the information about the suitability of possible locations in Olveston Parish for some non-strategic growth**. |
| **Attached documents** | Document 3 - Olveston Affordable Housing Needs Survey Report V6.pdf (10.1 MB)<br>Document 2 - Olveston Parish Vision May 2015.pdf (3.9 MB)<br>Document 1 - SGC Local Plan Sustainable Access Profiles.pdf (61 KB)<br>Document 4 - Parish of Olveston Design Statement v11.8.2004.pdf (4.3 MB)<br>Document 3a - Olveston Parish Housing SubGroup Final Report August 8th 2016.pdf (519 KB) |

| | |
|---|---|
| **Respondent Name** | Claire Normoyle |
| **Comment ID** | 7883105/113 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | I would like to know how the Council is going to reduce the CO2 levels in Thornbury with the increase in the building of new homes in this town over the last 2 years. The Council has not improved the lives of anyone living in Thornbury at the moment.<br><br>My only other Comment is why is this Council the only one out of the four Authorities not specifying which transport infrastructure projects are a prerequisite for the specified Strategic Development Locations to go ahead? The MetroBus is not coming to Thornbury so how is this going to help the use of private cars?<br><br>Why is this Authority not guaranteeing that these developments will only be allowed if the infrastructure is built first? You are not looking after the residents in Thornbury but looking after the developers instead. This is wrong..... |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anne Gale |
| **Comment ID** | 16344321/125 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Yes, they should be kept rural and encourage the beauty and Biodiversity of everything out there. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Thomas Robertson |
| **Comment ID** | 19434017/141 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Don't build on the Green Belt land in Hanham. Build on the Brownfield instead such as the Kleeneze site. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Thompson |
| **Comment ID** | 17795873/166 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | No. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Lyn Haigh - Rangeworthy Parish Council |
| **Comment ID** | 2301601/185 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Apologies for repetition from 3.1 but unsure under which Category this information is most relevant.<br><br>It is hard to understand how a small rural village like Rangeworthy with an inadequate sewerage system, and bisected by a busy road could be "identified" as a possible site for further development when it has already grown by a quarter in the past four years and current Outline Planning Applications could take that number to over 50% in under a Decade.<br><br>Rangeworthy was the only village to engage with South Gloucestershire Council during the original PSP Consultations starting in 2014. The Parish Council recognised that allowing the village to grow by 20 - 30 dwellings over the following twenty years was the right thing to do, particularly if the accommodation met needs at either end of the spectrum: small, affordable homes for first-time buyers and retirement properties for down-sizers. The number was also dictated by Wessex Water's recommendations regarding the capacity of the sewerage system following regular incidents of homes being flooded. Despite work by Wessex Water in 2017 to seal pipes along the main road, there have been several incidents of serious flooding during the past six Months (before building has even started on all the houses for which Permissions have been granted).<br><br>It appears that the Parish Council's willingness to consider any development at all has led to it being regarded as a soft target by speculative developers and Planners alike. Since 2014, SGC has granted Planning Permission for 44 new dwellings in Rangeworthy of which only 5 are 2-bedroomed with 37 being 4-bedroomed detached plus a large Gospel Hall off the main road (I would be happy to provide full details of all the Application Reference Numbers on request). Admittedly, should the Applications currently under consideration for additional sites of 50 and 14 dwellings respectively be Approved then they would bring more Affordable Housing but this would result in the village growing by more than half in under a Decade. This rate of growth is not sustainable and will predate the reference period of the Plan under Consultation so a period of consolidation is essential for community cohesion.<br><br>The B4058 is used by an increasing number of heavy vehicles for access from the M5 to Yate, East Bristol and the M4 and this will doubtless grow when Junction 18A is finished, especially since the Joint Transport Study which accompanied the Joint Spatial Plan did not offer any amelioration/ mitigation North of Yate. A recent Speed Survey produced an average of 36 mph in the 30 mph zone which means many vehicles are driving at much higher speeds and SGC obviously recognised this a couple of years ago when refusing to provide a School crossing patrol because "it would be too dangerous." A Dropped Kerb crossing point for the children was sited at what was then deemed the site with best visibility but it appears that this can now be moved along the road to a point with poorer visibility to facilitate development access. The lack of a major accident on this stretch is frequently cited but I consider that to be a matter of luck (two articulated vehicles have left the road in the last three years but, fortunately, only damaged property since there were no cyclists or pedestrians in the vicinity) and the additional openings and traffic will increase the risk of one occurring.<br><br>It is also worth noting that there is no shop, very little employment, the bus service is infrequent, no youth organisations operate and the Primary School is approaching capacity. This means that new residents will use their cars for commuting and access to shops, Medical Services, Schools, sports facilities and entertainments thereby increasing air pollution and congestion on the roads to Yate, Bristol and the M4 at Falfield which is already struggling and that is before the new developments at Charfield, Thornbury, Yate, Engine Common and Buckover are built as specified elsewhere in this Plan. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Philip Box |
| **Comment ID** | 19453025/195 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Historic, picturesque villages, such as Horton, Cold Ashton, Hawkesbury Upton and Wick, are extremely precious, picturesque and historically bounded communities. These small and picturesque locations should not be "investigated" for further development (even limited/non-strategic) given their historic nature and the detrimental impact further development would have in compromising this essential character.<br><br>Instead, a valued approach to rural settlements must also include the possibility of greater protection from development in such cases. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Carolyn Baker |
| **Comment ID** | 17252193/208 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Pucklechurch should not be considered as a location for Non-strategic Growth. The village already has a Trading Estate which results in heavy transport using the local roads. The local roads could not cope with additional housing without the building of new roads and all the negatives associated with that. The Public Transport links to Bath, Bristol and Yate are inadequate and though there is a cycle path the link to the Bristol to Bath Railway Path is not complete. There is quite a climb to get up from the Railway Path to the Pucklechurch Ridge which will stop a large number of people from using it as a viable alternative to using a car. Any additional housing here would inevitably lead to its urbanisation and loss of rural character. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Stephen Allen |
| **Comment ID** | 19454849/226 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |

| | |
|---|---|
| **Comment** | I am commenting on LGSD213, Land surrounding St. Mary's Church, Marshfield.<br><br>On review of all of the available Documents, I am firmly of the opinion that there is a significant ommision on them. In previous iterations, of the Map there were three other areas of Green Space on this Map. Highlighted in blue on the Document entitled LGSD213 Land Requiring Planning Protection. This is land that prior to the Call for Sites in 2015 had additional Planning protections.<br><br>I believe that the three areas highlighted should be offered protection, in the same way that the land around the Church and the pond currently are.<br><br>My reasons are:<br><br>1) The land formed by Hay Street, Barn End and East End, form the ancient border of the Village of Marshfield, and any potential development would diminish, or perhaps destroy the visual amenity that is given, by the arrangement of buildings, and the open spaces and the copse.<br><br>2) This area acts as a wildlife haven, Tawny Owls successfully nest here routinely, and the walls around the pond and further afield provide shelter for the Great Crested Newts and other wildlife that reside here. It was argued that it does not form a Wildlife Corridor in a Response to the "Local Green Space Consulation" in 2015 (attached). I would point out that Marshfield's position on the edge of the Downs (Land North of the A420 as compared to the hills to the South, means that it is in fact highly unlikely ever to be a "Corridor," what this copse does do is bring the wildlife that resides to the hillier area to the South, into the village, providing a refuge to previously mentioned species, and others.<br><br>3)The spaces and the copse help form an important sense of space, defining the Eastern end of the village, and provides a distinctive outline that defines the village, whether approached from the North or the South.<br><br>4) I have no specialist knowledge of Planning Law, but on review of the Document that was submitted in 2015 as part of the "Local Green Space Consultation 2015" (attached) I would argue strongly with the views put forward in this, where they seem to state that there is a lack of evidence for reasons to protect this area. Every single Map of Marshfield of any age that I have ever seen shows that the area that I write about forms the historic boundary of the village. I trust that this is enough historical evidence for the Council. I would argue that this larger area does indeed meet the criteria as set out in the national and local Guidance on this subject, namely 4(b) Beauty, 4(c) Historic, and 4 (f) Wildlife.<br><br>In addition, these areas are separate "pockets" of land they should be considered as a whole, as if considered individually their value is diminished. Also, if this area is not protected, there appears little value in protecting LGSD212, Land Around the Community Centre. To this point I wonder if the name allocated to to LGSD213 should be more appropriately known as "East End of Marshfield, incorporating St. Mary's Church, and Land in the Curtilage of Home Farm." Note - Home Farm is the old village name for what is now known as the "Old Manor House."<br><br>In summary, this area is deserving of protection. |
| **Attached documents** | LGSD 213 land requiring planning protection.pdf (138 KB)<br>Pages From Marshfield LGSD213.pdf (539 KB) |

| | |
|---|---|
| **Respondent Name** | George Gent |
| **Comment ID** | 19450753/227 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | The village of Tormarton is sustainably located in close proximity to the national Highway Network (J18 of the M4) and has the opportunity to accommodate substantial new residential development which will support enhanced service provision in the village. The village currently benefits from a Church, Pub, Village Hall and Nursery, a hotel and an excellent strategic location.<br><br>Land to the South of the village has been submitted under the Council's Call for Sites, and represents a suitable location for new residential and associated development at the village. Whilst falling within the Cotswolds Area of Outstanding Natural Beauty, the special character of this particular area of the AONB has been found to be of low quality and compromised by the presence of the Motorway.<br><br>Investment born by allocation of the site for residential development can provide substantial infrastructure and landscape gains, while also increasing the sustainability of the village though greater service provision, particularly bolstering of the existing bus service.<br><br>Attached hereto is a Plan showing the extent of land available to provide for new development at Tormarton; we would welcome the opportunity to discuss the potential of the site with Officers as part of the overarching Strategy for new non-strategic development in South Gloucestershire. |
| **Attached documents** | EDC1906_SHLAA.jpg (276 KB) |

| | |
|---|---|
| **Respondent Name** | Gillian Sanders - Wessex Water |
| **Comment ID** | 19455361/233 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |

| | |
|---|---|
| **Comment** | Development within more rural areas must include adequate measures to ensure adequate treatment of waste and surface water to avoid water quality deterioration. We would note that assessment will be required to consider connection to existing sewer networks or the possibility of construction of a new Water Recycling Centre (WRC). Land will be required for a new WRC sufficiently distant from development so as not to cause or create issues for odour, flies and noise. A new WRC will also need to be close to an appropriate watercourse for the discharge of treated effluent. Wessex Water estimate a new WRC takes approximately 10 - 15 years to plan and construct.<br><br>With regard to surface water:<br><br>• We recommend that all developments follow the SuDS hierarchy to ensure that surface water drainage issues are adequately dealt with. The development proposals must demonstrate satisfactory disposal of surface water and that Sustainable Drainage Systems have been incorporated. Sustainable Drainage Systems should maximise opportunities for green infrastructure and aim to achieve Greenfield run off rates with surface water run-off managed as close as possible to its source. Systems should be designed and implemented to deliver multiple environmental benefits, such as water use efficiency, water quality, Biodiversity, amenity and recreational improvements. Separate systems of drainage with points of connection or outfalls should be agreed with Wessex Water.<br>• For surface water, alternative means of conveyance (e.g. SUDS, natural watercourse, highway drains) must be properly investigated before any connection to a public sewer will be considered. In cases where there is no other option, only rainwater from impermeable surfaces could be considered, and then only into a dedicated public surface water sewer. Details relating to flow rates and storage would also need to be submitted. Such connections must not be made to the foul systems.<br>• There is the potential to provide more ambitious and comprehensive standards for SUDS than national standards. For example removing the automatic right to connect new development to the existing sewerage network. As recommended in the Progress in Preparing for Climate Change 2017 Report to Parliament Committee on Climate Change, "… There should be more comprehensive and ambitious national standards for SuDS. The automatic right to connect new development to the existing sewerage network to be made conditional on the national SuDS standards being met, and a clear Policy on who should maintain and adopt SuDS by default…" |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | H. Hanks |
| **Comment ID** | 19450977/242 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | The inclusion of Marshfield as a sustainable location for new residential development is welcomed and supported.<br><br>The settlement is subject to Policy constraints including Green Belt, AONB and Conservation Area which limit the opportunities for development, however, the Local Authority's attention is drawn to the parcel of land to the North of the Almshouses, adjacent to the existing Settlement Boundary of Marshfield.<br><br>The site is considered to represent an excellent opportunity for the sustainable growth of Marshfield without compromising the openness of the Green Belt or the character and appearance of the AONB. The site does fall within the Conservation Area, as does the whole of the settlement, and within the setting of Heritage Assets, however, the scale of the site presents a clear opportunity to mitigate against potential harms and produce a development of appropriate scale in an inherently sustainable location.<br><br>Attached hereto is a Plan identifying the parcel of land, and we would confirm that the site has also been submitted within the Council's Call for Sites. We would welcome the opportunity to present further details and to discuss the opportunity that the site presents as a non-Strategic Development Location within the emerging Local Plan. |
| **Attached documents** | Layout_LDC2119_SHLAA_01.pdf (211 KB)<br>Layout_LDC2119_SHLAA_02.pdf (201 KB) |

| | |
|---|---|
| **Respondent Name** | Louise Seaman - Mactaggart & Mickel |
| **Comment ID** | 19457953/275 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | We note in Appendix 1 the reference to Flood Zones within Frampton Cotterell. We can advise that the land at Poplars Farm submitted by M&M is within Flood Zone 1 and as such residential development is not prohibited by this issue. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Emma Jarvis |
| **Comment ID** | 2745345/283 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | See my Response to 3.1 and 3.3. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Lesley Brown |
| **Comment ID** | 16384673/290 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |

| | |
|---|---|
| **Comment** | Frampton Cotterell should not be considered for development as it is close to the SDL of Coalpit Heath and will be adversely affected by the lack of infrastructure in the area. The local G.P. Practice is struggling to cope and is endeavouring to cut numbers where it can. 4 week waits for appointments is the norm. The Schools are almost full and the local Secondary School is in special measures. Consequently, it would be unable to sustain even more building. The area has already accommodated extra housing at Park Farm in addition of several smaller scale developments. It is already affecting the village identity and the Parish Plan of 2012 confirmed that residents felt that the protection of Green Belt and the existing Green Space was important. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Lesley Brown |
| **Comment ID** | 16384673/291 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Comments re: Frampton Cotterell continued.<br><br>The 2012 Residents Survey (linked to the Village Plan) showed that 84% rated the rural environment as important together with 75% appreciating the village atmosphere. 71% favoured no growth, 20% favoured infilling and 1% housing development. NPPF 1 National Planning Policy Framework enables local people and their accountable Councils to produce their own Local and Neighbourhood Plans which reflect the needs and priorities of their communities.<br><br>The A432 through Coalpit Heath is used by residents from Frampton Cotterell to link to Bristol. There is little employment in the area and the majority of residents commute by car. It is already very congested and will be even more so if 1,800 houses are built there. Still more housing at Frampton Cotterell will only worsen the problem. The proposed, future MetroBus route will not accommodate all commuter needs. The current bus service is inadequate and unreliable. The proposed new Motorway Junction *(Western Option) will add to the problems especially if traffic is diverted via there in event of Motorway closures.<br><br>Any further development will adversely affect the rural community and its distinct rural character would be lost. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sarah Blackmore |
| **Comment ID** | 16193889/309 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Westerleigh Village has been named as a possible site for non strategic growth. Westerleigh Parish Council includes the settlements of Westerleigh & Coalpit Heath. Coalpit Heath has already been named as an SDL so identifying Westerleigh for non strategic growth will put added pressure on Parish services.<br><br>As Coalpit Heath has been specifically as an SDL I believe that Westerleigh Village and Frampton Cotterell should not be included in the non strategic growth locations due to their close proximity. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | B. Gardener-Wollen |
| **Comment ID** | 19466977/322 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Growth in villages should not be determined by a single figure or percentage. Policies need to be put in place to make sure that, in each case, non-strategic developments are built out over the lifetime of the Plan, and not more rapidly.<br><br>For example, Hawkesbury Upton is a beautiful historical village located inside of the AONB. Villages such as Hawkesbury Upton **should** be allowed to grow naturally without having to create major developments (of 10 or more dwellings at a time) in order for their contribution to count. By using **Option 3** and spreading the houses evenly and doing so over 55 villages opposed to 35, the District can meet its quota through small infill and preserve the amenity of small villages and their heritage. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sarah Blackmore - VALID Action Group |
| **Comment ID** | 19467105/323 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Westerleigh Village has been named as a possible site for non strategic growth. Westerleigh Parish Council includes the settlements of Westerleigh & Coalpit Heath. Coalpit Heath has already been named as an SDL so identifying Westerleigh for non strategic growth will put added pressure on Parish services. |

| | |
|---|---|
| | As Coalpit Heath has been specifically named as an SDL I believe that Westerleigh Village and Frampton Cotterell should not be included in the non strategic growth locations due to their close proximity. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Hicks - Falfield Action Group |
| **Comment ID** | 16618369/328 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Yes – Falfield.<br><br>• Charfield, Coalpit Heath, Thornbury and Yate are excluded from investigation of Non-Strategic Growth as they have been identified as Strategic Development Locations. 60% of Buckover Garden Village is in Falfield Parish, NOT Thornbury. There are currently c.240 dwellings in Falfield Parish, with a further 85 Approved at Heneage Farm. Buckover would deliver 1,800 additional homes (60% of 3,000), giving a total of 2,125 homes, increasing the number of dwellings by 654%. Falfield should therefore be excluded from inclusion in places for investigation of Non-Strategic Growth.<br>• Disregarding Buckover, the baseline number of dwellings in Falfield is based on the number of dwellings in the village before the Heneage Farm Application (PT17/4800/O) was Approved, yet there is no indication in the Document if these 85 houses 'count' towards the 1,800 dwellings to be developed by non-strategic development. Falfield has already been allocated more than its fair share of proportionate growth and the Approved Plans that will double the size of the village should exclude Falfield from the Non-Strategic Growth sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Claire Young |
| **Comment ID** | 916289/337 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | The land identified South of Frampton Cotterell that is not currently Green Belt actually lies in Westerleigh Parish and provides some separation between Frampton Cotterell and Coalpit Heath at this point. This land should be added to the Green Belt to strengthen it in an area where it is very narrow. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tristan Clark |
| **Comment ID** | 19194177/358 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | If Option 2 or 3 ends up being the preferred course of action for South Gloucestershire Council it should stress in the Local Plan that it is imperative for the Council to retain as much of the Green Belt as is realistically possible. If Respondents to this Consultation state a clear preference for Option 2 or 3 this **should not** be construed as blanket support for **unconstrained non-strategic growth** within the Green Belt. As a DPD the SGLP should stress that the first priority for feasible non-strategic growth should preferably be outside of the Green Belt. Limited non-strategic growth should be allowed inside the Green Belt **only** when development outside of the Green Belt has become unfeasible. Residents have strong concerns that, if this is not explicitly stated in the Local Plan, the Local Authority will use Consultations such as this to justify and permit development inside the Green Belt whenever it is *merely expedient* for them to do so. Consultations like this should not be employed as the thin edge of the wedge which will open the way for South Gloucestershire Council to further erode our precious Green Belt before or after 2036.<br><br>Paragraph 83 of the NPPF explicitly states "Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. **At that time, Authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan Period.**" |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David White |
| **Comment ID** | 5522945/361 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Cromhall already has problems with an overloaded sewer system and could not cope with an increase in housing. Slow Broadband and almost non-existent Public Transport would need sorting first. School capacity will not allow many additional pupils. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anna Donaghey |
| **Comment ID** | 19467297/371 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Tytherington has recently been subject to 2 development Applications (one passed and one in Pre-planning Approved stages) that have been given non-strategic status. Given that these combined, equal a c.25% increase to the size of a village poorly supported by services and infrastructure, must surely mean that further development needs to be questioned. |

| | |
|---|---|
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Caroline Brewser |
| **Comment ID** | 10284257/376 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Any building in village settings (such as Tockington and Olveston, but including all others) needs to include a diversity of house sizes and types. For instance, recent developments in Olveston seem to have been very large houses of at least 4 bedrooms which are outside the budget of a lot of people (typically costing at least £600,000). But crucially please note that this problem is not solved by incorporating 'Affordable Housing' (as defined by the Government) into developments, because this housing is not available to purchase for those people who don't qualify for assistance to obtain a home. Housing needs to be available to those who just want to buy a reasonably priced dwelling out of their own money for, say, around the national average price (currently approx. £240,000). A lack of housing in the 'average' price bracket means that it is difficult for the young people of the area to buy a home in the village they grew up in, or for new young people to move into an area. Please stop granting Planning Permission for executive homes and think about what the community (rather than what the developer) wants and needs! By encouraging young employed people to live in an area we can ensure the ongoing support of local shops, businesses and services, particularly Schools. Please ensure that any building in a village setting (a) takes into account the facilities available in that location, (b) is supported by improvements to the infrastructure and Public Transport that are available and (c) is proportionate to and in keeping with the size, age and type of village to which it is added. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Dean Simmonds |
| **Comment ID** | 19467521/392 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | • I understand that any development of less than 10 homes will not count towards the 1,300 homes required, as the Plan is currently setting a lower limit of 10 homes for inclusion in the Plan (and an upper limit of 499!). My view is that:<br>◦ We need to reduce the upper limit to ensure development remains proportionate and we remove the risk of small villages becoming small towns (which I believe is a Policy in the Local Plan (i.e. to avoid this type of big development in our small villages).<br>◦ We need to include EVERY home towards the target of 1,300 - why should a development of 2 or 3 homes not count? - because it's possible small villages can deliver their total allocation in small chunks like these, without needing groups of 10 or more. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Simmons - Westerleigh Parish Council |
| **Comment ID** | 17221409/403 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | **3.4. Do you have any comments or further information on individual rural places mentioned in this Document?**<br><br>**WPC considers that under all options the protection of the Green Belt must still be high priority in this Local Plan. Erosion of individual rural places and their characteristics must be avoided. In particular the Parish of Westerleigh which includes the SDL of Coalpit Heath and the rural development areas of Westerleigh Village and the fringes of Frampton Cotterell should NOT all merge and create one large mass, and the associated congestion problems. Westerleigh also adjoins the Yate Western Fringe. There could be pressures on provision of Parish services.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ann Barker |
| **Comment ID** | 19784257/427 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | I note that it is important to SGC to "preserve Green Infrastructure Network" to promote wellbeing. The lanes around Engine Common are currently used by cyclists (dedicated cycle route) and horses as well as people walking in them enjoying the trees and the nature. Preserving this area for all of the people in the surrounding area will be beneficial to human wellbeing. The recent (June 2017) Planning Permission from Sydney Freed Holdings which was declined outright for some key reasons that will be relevant:<br><br>• Loss of historic hedgerows, trees and grassland including an SNC (Site of Nature Conservation) contrary to Policy<br>• Over reliance on outward commuting of cars as no nearby shops or jobs<br>• Drainage issues – Sydney Freed proposed to raise the ground level on their proposed site to address this. They proposed a 5 foot raise!!<br>• The lanes flood and currently the water in the ditches is level with the road<br><br>The wildlife here is significant and important. There are roosting bats, Great Crested Newts, snakes and deer in addition to many birds including owls. This is not by repute only as I have seen ALL of these.<br><br>In addition I would like to point out that prior to the Sydney Freed Application, there had been a further Council declined Application by Bloor Homes. This time the Local Inspector visited the area and walked the lanes – after which he made his ruling to Decline. I know I am biased but it is a very special area with a unique rural character like no other. I would urge you to exclude Engine Common from the Plan as what potentially could be lost here is completely out of proportion with what could be gained. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alveston, Rudgeway, and Earthcott Parish Council |
| **Comment ID** | 19784545/434 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | **Again , the infrastructure must be available to support these developments including the impact from the strategic solutions.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Peter Rawlinson - Gleeson Strategic Land Limited |
| **Comment ID** | 19328353/452 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Gleeson considers Marshfield to be a suitable place for new non-strategic growth. It is a sustainable settlement with a population of around 1,600 according to South Gloucestershire Community Profile ("**SGCP**") Paper [undated]. The village is one of the largest considered by the SGCP Paper, and this is reflected in the relatively large number of services and facilities present in the settlement.<br><br>The A420 provides access to Bristol and Chippenham, and Bath and the M4 via the A46. The village is also served by a daytime 2 hourly bus service which operates Monday – Saturday.<br><br>As is shown below, the settlement benefits from a range of services and facilities.<br><br>o A place of worship;<br><br>o Post Office;<br><br>o Small range of shops [6 x A1 (shop) use class, 1 x A2 (professional services); 1 x A3 (food retail); 3 x A4 (bar/Public House)];<br><br>o Petrol station;<br><br>o GP Surgery;<br><br>o Community Hall;<br><br>o Playgroup/Nursery;<br><br>o Youth Club<br><br>o Primary School; and<br><br>o Mobile Library.<br><br>In addition, Marshfield has two children's equipped play areas, an equipped area for older children/teenagers, a playing field with football pitches and an artificial cricket wicket, a common, Allotments, a Church yard and a Cemetery.<br><br>Through the Rural Settlements and Villages Topic Paper Marshfield was assessed as having an "acceptable" level of access and consequently was ranked 12th most sustainable village within the rural area.<br><br>Development at Marshfield would also provide much needed Affordable Housing for local people. In January 2016, Marshfield Parish Council published a Position Statement on new housing development. This Position Statement reads:<br><br>*"In order to sustain the vitality of the Parish MPC [Marshfield Parish Council] recognises the need for building a limited number of new homes to meet the needs of local people in the current Policies, Sites and Places Plan Period (until 2027). An independent Housing Needs Survey(2013), as accessed by SGC [South Gloucestershire Council], identifies a need for up to 37 houses for people with a proven local connection. MPC expresses a strong preference for any local requirement housing to be provided within the current settlement boundary, but recognises that few sites exist and these may not become available. Restricted building on a site beyond the settlement boundary may therefore be necessary."*<br><br>The Marshfield Community Land Trust has also recently been established to bring new Affordable Housing to the area. Gleeson understands that the Land Trust has aspiration for delivering up to 10 - 15 new Affordable Homes with a mixture of 1, 2 and 3 bedrooms. Gleeson's site at Marshfield would be well placed to facilitate this provision of Affordable Housing, along with market housing to support its delivery. |

| | |
|---|---|
| | Whilst Marshfield is identified as a sustainable location for new housing it does benefit from an attractive historic core covered by the Marshfield Conservation Area. Any new development would need to have close regard to this. Gleeson's site is outside the Conservation Area and it is considered that a suitably designed scheme for new housing could be achieved without unacceptable harm to the Conservation Area Heritage Asset. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alan Jones - Hanham District Green Belt Conservation Society |
| **Comment ID** | 17236353/505 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | 3.4 Further Comments:<br><br>Green Belt land is the front-line against urban sprawl and is the most accessible countryside for the communities who can benefit most from the enormous health and wellbeing benefits it offers. |
| **Attached documents** | Hanham District Green Belt Conservation Society (Alan Jones).pdf (20.3 MB) |

| | |
|---|---|
| **Respondent Name** | Daphne Dunning - Cromhall Parish Council |
| **Comment ID** | 16475073/606 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | 3.4<br><br>The Council requests that when calculating housing sustainability evaluations you extend the thought process in Cromhall's case to include for the:<br><br>The huge increase in associated traffic and HGV's from ALL developments including new Employment Zones from Chipping Sodbury, Yate, Charfield to even Coalpit Heath as nearly all the Northbound traffic will funnel through the roads in or around Cromhall to get to Junction 14 of the M5 – ALL of which traffic will be contained within a 'B' Road environment.<br><br>The vastly increased impact on the healthcare and Schooling, with a very real possibility that when possibly 5,000 extra people (South Glos. & Gloucs) apply to Wotton Under Edge healthcare services Villages such as Cromhall may be excluded from the catchment area.<br><br>The Council would also like to be assured that in 10-years time, our children will have a Secondary School to join as at present KLB is the target destination, but with the reasonable possibility of 1,000 extra children between Cromhall and KLB, how big can one School get and yet maintain an acceptable standard.<br><br>KLB have already excluded Falfield from their catchment area, how soon before Cromhall is excluded? With Buckover Garden Village in consideration access to Castle School would also be denied via a reduction in catchment area.<br><br>The absolute need to commute to work via car as it is impossible to rely on a fragmented rural bus service to get to any major employment zone at an acceptable time and the eventual impact on commuters penalised by tolls and taxes that will inevitably come into force in the future. It appears that the proposal is creating a need for the very transport method that you aim to reduce.<br><br>The fact that Cromhall has a small corner shop that has only the very basics in food offerings, a Pub that during the past  years has closed its doors to trade on approximately  different occasions and a tiny Junior School that has an intake capacity of  children and already services children from Cromhall, Tytherington, Wickwar and Charfield amongst more rural local areas.<br><br>The Council would also like you to consider the housing impact on the infrastructure that the acknowledged building zones will have on our Community -<br><br>The approx. 3,000 additional people that will be living in Charfield - 2 miles from Cromhall<br><br>The approx. 8,000 additional people that will be living in Buckover - 2 miles from Cromhall<br><br>The approx. 2,000 additional people that will be living in Thornbury - 5 miles away from Cromhall<br><br>The approx. 150 additional people that will be living in Tytherington - 3 miles away from Cromhall<br><br>The approx. 220 additional people that will be living in Falfield - 2 miles away from Cromhall |

| | |
|---|---|
| | The approx. 4,000 additional people who will be living in Yate - 7 miles away from Cromhall<br><br>The approx. 400 additional people who will be living in Chipping Sodbury - 7 miles away from Cromhall – Assumed from the Rural allocation demand<br><br>The approx. 4,000 additional people who will be living in Coalpit Heath - 9 miles away from Cromhall<br><br>To be clear the Council is not against progress, but it does need to see the practical solutions to the coming storm of building, HGV's, roadworks, traffic jams, rise in crime stats, loss of air quality, poorer access to Healthcare and Schooling, longer commutes to work and pressure on established communities.<br><br>Unfortunately, the Council does not see the 'big picture Plan' being focused on anything other than a scrabble to address the lack of a 5-year Plan and a need to meet housing targets. We need roads, even a Bypass from Yate to the M5, we need infrastructure plans which do not solely rely on the building companies to pretty up the roads next to their building zones but to account for the traffic between place A and place B. We need a clear date for the upgrade of Junction 14 of the M5 or in a matter of years people will be killed queuing on the hard shoulder as at Junction 12 or round the bend on Tortworth Hill. We need Schools, leisure facilities, a Hospital etc closer than 20 miles away or in another County, if you decide to urbanise a rural environment you need to provide the ability for people to live safely and function in that environment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christine Eden - Marshfield Community Land Trust |
| **Comment ID** | 14404353/620 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | **Q 3.4 Do you Have any Comments or Further Information on Individual Rural Places Mentioned in this Document?**<br><br>The value of locally determined housing for people with local connections is clearly recognised in both Government and SGC Policy on Affordable Housing. Delivering such developments is difficult in part because of landowners' expectations that Green Belt land might be released for market allocations.<br><br>Marshfield CLT is the first of such initiatives in rural South Gloucestershire and its chances of securing a rural exception site would be significantly enhanced if (in the absence of a Policy which directly acknowledges community led development) SGC Policy applies Option 1 to Marshfield. This would send a clear signal that allocations will not be made within the Green Belt. The consequent loss of hope value would place the CLT in a much stronger position in its negotiations with landowners for rural exception sites.<br><br>Marshfield has very limited Public Transport. Housing for people with local connections would help limit travel-to-work time, energy use and pollution. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Zoe Hancock - Bristol Avon Catchment Partnership |
| **Comment ID** | 19832225/678 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | No additional Comments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mark Williams |
| **Comment ID** | 19729473/722 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Wick provides for a range of services, as demonstrated by the Sustainable Access Profile prepared by the Council. However, the Mapping produced does not include the BP Garage located immediately adjacent to the Land at London Road, which has a shop which provides day to day convenience provision.<br><br>In addition, the Profile does not show the local employment provision which is clustered at the Eastern end of the village, around Wick Quarry.<br><br>These features further support the sustainable nature of the Land at London Road as a potential allocation to meet the identified local housing need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Chelverton Developments Ltd |

| | |
|---|---|
| **Comment ID** | 16478625/734 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | (3.4) Chelverton support the Council's identification of Chipping Sodbury as a location for further investigation for non-strategic growth. Given the size of the settlement and range of employment and community facilities within the Yate/Chipping Sodbury urban area, it is a logical and sustainable search location. Chipping Sodbury has the ability/capacity to absorb proportionate housing growth and make a valuable contribution to the overall non-strategic housing requirement. This should be expected for a settlement of this size, status, and advantageous location adjoining Yate. Underlining the suitability of Chipping Sodbury as a location for new housing is the fact that the JSP has identified land on the Southern side of the town as a contingency for the SDLs. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | James Carpenter - Falfield Parish Council |
| **Comment ID** | 16617825/742 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Yes. Falfield should not be included as an initial place for NSDL assessment. Thornbury and Charfield have been omitted from Appendix 1 as they have been identified in the SDL part of the Local Plan whilst Falfield has not. The majority of the Buckover SDL is in Falfield Parish and our rural Parish is already being allocated far more than its fair share of the housing load.<br><br>In addition to this, Planning Approval was granted recently in 2017 to double the size of Falfield Village itself with 85 new houses via the PT17/4800/O Heneage Farm development. We feel that Falfield has already been allocated more than its fair share of proportionate growth for this next Local Plan Period and this should be taken into account.<br><br>Falfield Parish Council believes that as a rural Parish it is important to have Superfast Broadband in order to be able to communicate o the wider world. The Sustainability Profile for Falfield is misleading in that it states that Superfast Broadband is available to the Village, meanwhile many of our residents still report that they are not able to access this facility.<br><br>Falfield Parish Council would also question whether Falfield Village Hall could be considered a Community Centre as it is not open on a regular basis. |
| **Attached documents** | Falfield Parish Council (Mr. James Carpenter).pdf (1.9 MB) |

| | |
|---|---|
| **Respondent Name** | Sovereign Housing Association |
| **Comment ID** | 16477825/777 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Land Rear of Mount Pleasant Farm is located in a sustainable location, close to a range of services and facilities, plus Public Transport routes.<br><br>Specific evidence relating to the site and its surroundings is presented in the parallel Submission made on behalf of the landowners and those owners of adjacent land. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Harrow Estates Plc and Robert Hitchins Ltd |
| **Comment ID** | 19898721/783 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | See attached. |
| **Attached documents** | Harrow Estates Plc and Robert Hitchins Ltd - Barton Willmore (Robyn Nicholl).pdf (6.3 MB) |

| | |
|---|---|
| **Respondent Name** | Heather Elgar - West of England Nature Partnership |
| **Comment ID** | 19839553/790 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Please find below Comments from the West of England Nature Partnership (WENP) in response to the South Gloucestershire Local Plan Consultation.<br><br>For transparency, please know that Dominic Mellon (Consultant in Public Health for South Gloucestershire Council) sits on the WENP Board and thus note a declared conflict of interests. This Response reflects the aims and objectives of the Partnership and does not reflect views of individual Board members.<br><br>Question 3: Non-strategic Growth: |

| | |
|---|---|
| | No Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | SPM Homes Ltd |
| **Comment ID** | 19732097/823 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | **Non-Strategic Growth:**<br><br>3.4 Do you have any Comments or further information on individual rural places mentioned in this Document?<br><br>Further work is required to develop a Scoring Strategy for the proposed non-strategic locations. This should seek to balance the sustainability of the villages against the level of services that development within the villages would support e.g. Schools, shop, Church, Village Halls, Doctor's Surgery etc. Work undertaken to date identifies that Almondsbury scores very highly when subject to review under the Suitability Access Profile. Further work is however required to provide some form of ranking for the villages under consideration. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Howard Owen - Cleve RFC |
| **Comment ID** | 19732321/915 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | We propose that the Southern Playing Fields at Cleve RFC (see hatched area in Appendix 1) be allocated for residential development.<br><br>Background:<br><br>Cleve RFC is a community organisation which has been in existence for  years. The current financial climate is proving difficult to negotiate for amateur rugby clubs such as Cleve RFC. It is proving difficult to achieve the trading surplus which is needed to sustain the Club in current and future years.<br><br>The Club's commercial operations no longer support the community aspect of the business plan as the bar is no longer the mainstay of income due to societal changes. The renting of the Club's facilities is proving difficult as growing competition from many other professional organisations become a significant obstacle for securing event and rental incomes.<br><br>The Club House itself is  years old and the maintenance costs are increasing annually. Various areas of the Club House and land within the ownership of Cleve RFC are in need of repair or complete replacement such as boilers, showers, flooring, decor and the renovation of the playing pitches.<br><br>Cleve RFC wish to retain their community presence at their existing location, however at present the commercial pressures mean that this is unviable. The only asset the Club holds is the land and as such, the sale of the Southern parcel of land would be the only way to generate funds to sustain the future of Cleve RFC. Vehicular and pedestrian access to the proposed development plot could be achieved via Cleve RFC owned land, linking to Cossham Street with no adverse impact on the retained sports facilities.<br><br>Proposal:<br><br>Mangotsfield is identified within the Consultation Document as an urban edge location, which is defined as a 'rural location where no settlement currently exists, but [is]within 400 metres of the existing urban communities, with existing cycle, walking and/or Public Transport links to the urban area.' It is also identified as a place for investigation as an area for Non-Strategic Growth.<br><br>The subject site itself at Cleve RFC is located within the Green Belt boundary, designated by Policy CS5 of the adopted Core Strategy. We suggest that the Green Belt boundary be shifted Eastwards, with the A4174 Ring Road acting as a buffer between the Green Belt and the urban edge location of Mangotsfield. This would remove the subject site from the Green Belt, which would be a more consistent approach as this the only allocated Green Belt land to the West of the Ring Road, and most of the surrounding land to the West has now been developed for residential use.<br><br>Mangotsfield is a sustainable location which is well suited for residential development despite its current Green Belt designation. This is demonstrated within the Sustainable Access Profile (February 2018), as the land beyond the existing developed area of Mangotsfield is recognised as having 'a reasonable level of sustainable access to most key services and facilities, some via walking and cycling, and many others through Public Transport connections.' The Council should, in identifying locations for development, start the search by looking for locations with an appropriate range of services and facilities to meet local needs in a sustainable manner, and the subject site meets these criteria.<br><br>Summary:<br><br>The only asset Cleve RFC currently have is their land. A residential allocation at part of the site would enable a higher sale price for the land. The proceeds from the sale of the land would then release funds, allowing the grounds to be reorganised and then the construction of an all-weather pitch (AWP) which will enable greater use despite the reduced site area as well as creating opportunities for outside organisations in the community to use the AWP both during daytime and evenings, along with upgraded facilities for members. The funds would also be used to undertake vital maintenance works within and around the Club House, making this once again an attractive location to visit socially and hire for events, ensuring an income stream and more importantly the future of this community facility. |

| | |
|---|---|
| | The subject site represents a readily developable site in a sustainable location, which has been identified as a possible location for Non-Strategic Growth. Whilst the allocation would represent a non-strategic development, it would make a significant contribution to the housing stock in the local area.<br><br>This Representation has demonstrated that the allocation of the subject site for residential development would be a positive allocation, deliverable within the short to medium term, and would also enable the continued operation of a sporting and community facility.<br><br>In light of the above, we consider that the allocation of the land at Cleve RFC for residential development is fully justified, and the land should be allocated.<br><br>I would request that we be kept informed of process as the Plan progresses, and I would reserve the right to appear at the Examination if necessary. |
| **Attached documents** | Cleve RFC (Howard Owen) - JLL (Kevin Hunt).pdf (390 KB) |

| | |
|---|---|
| **Respondent Name** | Robin Pearce - Ivywell Capital Ltd |
| **Comment ID** | 19998625/963 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | 19) We have the following Comments on Rural Place No. 29 in Option 3: Tockington. In terms of meeting the two key Planning issues (Para 2.57 of the SGCLP Draft), Tockington is located wholly within Flood Zone 1 and is considered by the Council to have sustainable access to key services and facilities via existing Public Transport services to Thornbury and Cribbs Causeway. It has excellent accessibility to the North Fringe and City Centre and all the job opportunities that are available.<br><br>20) There are various services and facilities in proximity to Tockington with good Public Transport links to Thornbury, Cribbs Causeway and the wider region. Olveston Primary School is within 800m and a key criterion of the SGCLP Draft Plan is to support the long term success of rural Primary Education facilities. As such it is considered that this location should be supported for housing allocation as part of the Local Plan both immediately, and as a failsafe as safeguarded land should other sites fail to deliver.<br><br>21) Compared to other rural locations, Tockington is located much closer to the Bristol urban edge than most, and Bristol therefore represents a readily accessible location for commuting by cycling. Locations outside of the Green Belt are much less likely to encourage such trips and new households will be much more reliant on the private car. In the event that the Park and Ride location is delivered on the A38 between Fernhill and Washingpool Hill then the households at Tockington will have ready access to the facility and the fast and regular routes into the North Fringe and City Centre that will prevail.<br><br>22) The site at Hardy Lane/Lower Tockington Road in Tockington is adjacent to the existing Settlement Boundary and is in proximity to built form on 3 sides. It comprises land which is unnecessary to keep permanently open. The site is available, developable and deliverable. There are no constraints to development on the site save for its Green Belt designation. A Title Plan and Site Plan accompany these Representations. The developer is the landowner with the ability to start work on the site subject to Planning Permission.<br><br>23) Whilst the site is capable of achieving up to approx. 90 dwellings at 30dph, it is considered that this would be disproportionate growth for the scale of the existing village. Development of circa 15 - 25 units would be appropriate and would result in a modest increase in the scale of the village. The Table in Option 3 establishes there are 131 homes in Tockington. An increase in 15 homes is an 11% increase in the number of homes in the village and would not impact adversely on its character; 25 homes would represent approximately 19%. Development in this location would provide for a natural 'rounding off' given its proximity to the heart of the village and adjoining built form. Indeed there is an opportunity to positively enhance the entrance into the village from the South through sensitive design.<br><br>24) The landownership extends further along Hardy Lane and in the event it is considered unnecessary to allocate the whole site for immediate development, it is nevertheless recommended to remove the Green Belt designation from the whole site and keep any unallocated remainder of the site as safeguarded land as a contingency site should other sites fail to be delivered in a timely manner, or indeed as a longer term option beyond the Plan Period. Paragraph 85 of the NPPF encourages such an approach in order to ensure that LPAs are able to meet their longer term development needs to ensure that Green Belt boundaries would not need to be altered again at the end of the Plan Period.<br><br>25) Notwithstanding this, there is scope to provide alternative community benefits in the form of green infrastructure and other appropriate uses. The development proposals can help achieve many of the objectives for the Parish and we would welcome a discussion on how to achieve a comprehensive solution. A Concept Plan has been submitted as part of previous Call for Sites Consultations, and is appended to this year's update for completeness. It demonstrates one potential form of development but the landowners are not wedded to it and are willing to explore all potential development solutions for the site.<br><br>26) The homes themselves will be of mixed accommodation and able to meet the needs of the Housing Needs Survey that identified the need to provide Starter Homes and opportunities for downsizing. The development would make necessary CIL Payments and secure Policy compliant levels of Affordable Housing. |
| **Attached documents** | Ivywell Capital Ltd (Mr. Robin Pearce) - Alder King Planning Consultants (Mr. Simon Fitton).pdf (2.1 MB) |

| | |
|---|---|
| **Respondent Name** | David Moodie |
| **Comment ID** | 19732737/981 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Please see supporting Representations Document and Call for Sites Submission. |
| **Attached documents** | Mr. David Moodie - Fisher German LLP (Ms. Angela Smedley).pdf (578 KB) |

| | |
|---|---|
| **Respondent Name** | Joe Mogg |

| | |
|---|---|
| **Comment ID** | 19809089/991 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | To whom it may concern,<br><br>I am writing this email to voice my concern for the proposals to develop the land behind the Riverside Estate.<br><br>My concerns are primarily 3 pronged.<br><br>1. It is an Area of Outstanding Natural Beauty with many forms of wildlife from Deer, foxes, badgers and many more who would lose their homes and feeding grounds.<br>2. It's an area heavily used by horse riders, runners, dog walkers and others as a recreational area.<br>3. My main concern. If up to 200 dwellings are to be proposed, therefore you could be looking upwards of 300 vehicles as you know lots of households have more than 1 car, I do not believe the Riverside Estate could take that volume of traffic even with access via Castle Farm Road as well. It would be dangerous for all the people who live on the Estate and especially the many children who now live and play on the Estate.<br><br>I would like this email to be included in any Consultations regarding the proposals. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ann Weaver |
| **Comment ID** | 19808897/1002 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | In regards to the proposed destruction of the Green Belt area by building houses which includes Iron Acton, this would also increase traffic and cause overcrowding in Schools and put an additional strain on local Medical Services. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Cate Davidson - Sodbury Town Council |
| **Comment ID** | 4877793/1009 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Dear Planning Team,<br><br>Sodbury Town Council responds as follows to the Local Plan (non strategic) Consultation:<br><br>Q. 3:<br><br>3.4 No Comments.<br><br>Please note the Comments as appropriate. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hannah Spanton - Badminton Estate |
| **Comment ID** | 19884225/1031 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Comments have already been outlined in detail in 3.1. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Gill Pirie |
| **Comment ID** | 19840321/1052 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Developers are focussed on development around our rural community as a possible option to meet housing needs. Our generation must seek to protect Hanham from eventual overcrowding, loss of 'Parish feel' and identity, plus lost views of the beautiful Hanham Hills that overlook our community. We should ensure our children and future generations can enjoy much of the rural landscapes and Green Belt we see today, plus experience the close knit village community spirit. |

| | |
|---|---|
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Gill and Mike Dunkley |
| **Comment ID** | 19845441/1062 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Fundamentally, South Glos needs to discuss and specify NOW, its desire to extend the 'Green Belt' to protect the countryside to the North of the current designated 'Green Belt' and use it to **maintain and protect** the historic hamlets around the Strategic Locations like Thornbury, Chipping Sodbury, Yate etc. It must also be recognised, that some of these historic locations, need additional protection from increased traffic loads. In some instances there should be a change of road classification, traffic re-routed to roads more sustainable for the traffic type/levels. Modern development has pre-requisite noise pollution standards to which they have to adhere. However, no consideration is given to the associated noise pollution on existing historic property, where glazing is paper-thin – this is fundamentally wrong. Road surfaces in the vicinity of such property should have to be modified to reduce noise and to ensure that original fabric can be maintained. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | L. Heland |
| **Comment ID** | 19780097/1071 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | I and other local residents will resist proposals to build on Local Green Spaces and Green Belt land. People value and cherish these green spaces. We do not want the character and beauty of our local environment ruined by further development. In particular, we do not want the Hanham Cricket Club and Cricket Field to disappear and we certainly do not want Green Belt areas in and around the Hanham area to be changed in any way.<br><br>This strength of feeling has been clearly evident at several (packed, standing room only) local meetings on this topic.<br><br>I very much hope that our local Government and Planners will take the views of residents into account when deciding what action is taken. The message from local people is very clear. The vast majority are saying "hands off" the Green Belt and Green Spaces. Let's not ruin our area.<br><br>Thank you for the opportunity to give feedback. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Robin Pearce - Bristol & England Properties |
| **Comment ID** | 19884417/1075 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | 19) We have the following Comments on Rural Place No. 11 in Option 3: Frampton Cotterell. In terms of meeting the two key Planning issues(Para 2.57 of the SGCLP Draft), the Land at Bristol Road/Perrinpit Road in Frampton Cotterell is located within Flood Zone 1 and is considered by South Gloucestershire Council to have sustainable access to a variety of key services and facilities.<br><br>20) There are numerous services and facilities in Frampton Cotterell with excellent Public Transport links locally and across the region as evidenced in the accompanying Transport Feasibility Statement from PEP Transport Consultants as well as the Sustainable Access - Public Transport Findings Document forming part of the Evidence Base for the Consultation.<br><br>21) There are also numerous community services and facilities serving Frampton Cotterell also set out in the accompanying Transport Feasibility Study to be read alongside the Sustainability Access Profile for Frampton Cotterell (updated February 2018) and the Sustainable Access – Village and Settlement Findings 2018 in the Evidence Base. There are 18 shops, 3 health providers, 7 community facilities including 2 Post Offices, 3 Pubs, 11 Schools and a community centre with various employment opportunities in close proximity. This is a clear example where development on the urbanised edge of the Green Belt would result in new housing with reduced traffic generation and the creation of a sustainable pattern of development; this land on the edge of Frampton Cotterell should be allocated as a location for non-strategic housing growth in the Local Plan for 45 houses.<br><br>22) The site at Bristol Road (B4058)/Perrinpit Road is just inside the Green Belt boundary, adjacent to the existing Settlement Boundary and is surrounded by established built form on 3 sides. As such, the site does not comprise land which it is necessary to keep permanently open. The particular location of this site is an area of Green Belt which, given the established built form on three sides together with its location adjacent to a well-established urban area, no longer serves a useful Green Belt function. The allocation of this site for development would result in a defined boundary using physical features that are readily recognisable and permanent.<br><br>23) It is worth noting that Planning Permission for four homes was granted in 2016 on land comprising the former Coach House car park, on Bristol Road North of Perrinpit Road (PT16/3466/F). In considering this Application, Officers reported that the development would continue the existing building line and not constitute sporadic ribbon development. We agree with this assertion and it is equally if not more applicable to Land South of Perrinpit Road which has a more established urban grain.<br><br>24) There are suggestions that Land at Frampton Cotterell was not released for residential allocation because of issues relating to heritage, landscape and traffic. The site at Bristol Road is adjacent to existing built form and on the edge of an established urban area such that there are no significant landscape constraints. There are no Heritage Assets on or adjacent to the site. The site is adjacent to Bristol Road and in proximity to an established Transport Junction. Further details about this Junction can be found in the accompanying Transport Feasibility Study **(Appendix 1)**.<br><br>25) Access is an important consideration for any site and the Transport Feasibility Study submitted with these Representations, from PEP |

| | |
|---|---|
| | Transport Consultants demonstrates acceptable site access can be achieved for vehicles, cyclists and pedestrians. The Transport Feasibility Study demonstrates that there are no transport issues affecting the site that would prevent its development or delivery.<br><br>26) The Table in Option 3 in the Consultation Document establishes there are 2,579 homes in Frampton Cotterell. The site is capable of achieving up to approximately 45 dwellings. This is a 1.5% increase in the number of homes in the area and would not have a significant impact on the scale or character of the area. The homes will be of mixed accommodation and able to meet the needs of some members of the community. The development would make any necessary CIL Payments; at this stage there is nothing to suggest it cannot provide Policy compliant levels of Affordable Housing.<br><br>27) There are no constraints on the site save for its Green Belt designation. The site is available, developable and deliverable. A Site Plan accompanies these Representations alongside the Transport Feasibility Study and an indicative Site Access Sketch produced by PEP Transport Consultants. The landowner has the ability to start work on the site immediately subject to receiving Planning Permission. Accordingly, this site should be supported for a non-strategic growth housing allocation in the Local Plan. |
| **Attached documents** | Bristol and England Properties (Mr. Robin Pearce) - Alder King (Mr. Simon Fitton).pdf (883 KB) |

| | |
|---|---|
| **Respondent Name** | Clifton Homes Ltd |
| **Comment ID** | 16617921/1084 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | **Please see submitted Representations.** |
| **Attached documents** | Clifton Homes Ltd - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (1.7 MB) |

| | |
|---|---|
| **Respondent Name** | South West Strategic Development and Ian and David Knipe |
| **Comment ID** | 19884577/1108 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Please see submitted Representations. |
| **Attached documents** | SW Strategic Development and I. and D. Knipe - Grass Roots.pdf (27.4 MB) |

| | |
|---|---|
| **Respondent Name** | Progold Ltd |
| **Comment ID** | 19737665/1122 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Please see submitted Representations. |
| **Attached documents** | Progold Ltd - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (7.9 MB) |

| | |
|---|---|
| **Respondent Name** | Lilian Sheeley |
| **Comment ID** | 19785345/1191 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | We are totally opposed to the building on Green Belt at Webbs Heath. This area is greatly used by the public of this area. We all need in our lives space to have for recreation, dog walking, grandchildren to play, climb trees, and watch wildlife flourish throughout the Seasons. On Webbs Heath and surrounding fields we have Rabbits, Deer, Moles, Butterflies, A pond, to name but a few. We have many rare wild flowers. The surrounding fields are a corridor to Warmley Forest Park for all these animals and many more. The roads of Webbs Heath and surround are NOT suitable for more traffic. We have local stables and farms witch have horse riding facilities. These riders MUST be allowed to enjoy their hobby in safety. The TV news last week reported due to the amount of rain the Hay and Straw has a 3 fold increase in price, due to shortage. Fields are THERE and should be used, they should NOT be covered in CONCRETE. WHERE IS ALL THE RAIN GOING TO GO IF IT'S COVERED IN CONCRETE. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Neil Wilkins |
| **Comment ID** | 19839905/1217 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Places for Investigation for Housing:<br><br>The submitter has responded to the Call for Sites by submitting Land to the Rear and Adjoining Webb's Heath Farm, Webb's Heath. The submitter considers that this site is deliverable and developable on its own, or in tandem with other submitted sites.<br><br>The submitter: |

| | |
|---|---|
| | - Supports increased housing delivery in the District to meet the needs of a growing population and to provide a wider range and choice of housing that is affordable.<br><br>- Considers that locations on Bristol's lower Eastern Fringe should be the focus of investigation because these areas are well related to the existing development pattern, District Centres with their shops, services and facilities, and are accessible by a choice of means of transport.<br><br>- Supports the proposed Spatial Strategy for the District, specifically the focus on land in the vicinity of Bridgeyate and Webb's Heath. Siston Lane would provide a more defensible Green Belt boundary.<br><br>- Supports the focus of investigation around Bridgeyate as set out in Table 1: Places for Investigation, noting that this should include Land to the Rear and Adjoining Webb's Heath Farm. As well as being sustainable in NPPF terms, this area benefits from recent capital investment in road and public transportation investment and utility infrastructure reinforcement.<br><br>The submitter wishes to be notified of further Consultations by email and would like to be considered for invitation to the Examination of the submitted Plan. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mrs. C. Culver and Mr. A. Culver |
| **Comment ID** | 19840033/1222 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | We strongly oppose any development of the Hanham Hills and surrounding areas. We have chosen to live in for the past years because of the green spaces and feeling of near countryside. To build on the Cricket Pitch would take any feeling of a local community being able to come together at a local Point and community spirit that it affords would be destroyed, the character of Hanham Abbots would be lost. Please think again before going ahead the community would be greatly affected by this development. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Helen Johnstone - Stroud District Council |
| **Comment ID** | 14317537/1224 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | No Comments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Messrs Keller, Grace, Moorlen and Barnes |
| **Comment ID** | 19889409/1239 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Part 1 (Housing Requirements) and Part 2 (Spatial Strategy) including Questions 1, 2, 3 and Strategic Development Locations:<br><br>Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Messrs Keller, Grace, Moorlen and Barnes - Pegasus Group (Mr. Daniel Weaver).pdf (423 KB) |

| | |
|---|---|
| **Respondent Name** | Reuben Bellamy - Lone Star Land Limited |
| **Comment ID** | 19738529/1246 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Question 3.4:<br><br>In fulfilling the Joint Spatial Plan's requirement for development to occur in non-strategic locations will necessitate Development Boundary Reviews. This includes South Gloucestershire, where a requirement to undertake Development Boundary Reviews was identified by the Inspector in his Report into the current South Gloucestershire Core Strategy (Inspector's Report Para 68). The Council have failed to do this in any subsequent Development Plan Documents and therefore it should be undertaken to support the Emerging Local Plan.<br><br>In reviewing the non-strategic locations for growth, the Local Planning Authority should therefore also undertake Development Boundary Reviews for the settlements identified. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anita and Colin Houlding |
| **Comment ID** | 19840289/1267 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | There is no planned additional infrastructure to support increased development; the few local Doctor's Surgeries and Dentists are already under huge pressure. There are few local shops so development will increase traffic on roads to the local supermarkets and Retail Parks, which are already congested.<br><br>Objections to Site 1: Hanham and Site 2: Willsbridge:<br><br>Any new development will increase noise and light pollution to this area.<br><br>New development will result in increased traffic in already congested country lanes.<br><br>The suggestion of 'realigning existing route of Court Farm Road' to implement safer, less abrupt bend, will increase the flow of Heavy Goods Vehicles on lanes that are already designated 'unsuitable for Heavy Goods Vehicles.' Straightening this area will only assist the who use this road as their personal race track. This bend helps to slow down current traffic and avoids accidents.<br><br>The narrow lanes are used as a 'rat run' by motorists and scenes of road rage and aggression in the 'choke' points in these lanes are witnessed by locals regularly. Increasing traffic through this area will only add to these instances. Any suggestion of widening the lanes is not a solution for improvement; it just changes the problems that will have to be endured by people who live here.<br><br>More traffic will increase the danger to cyclists crossing Abbots Road on the cycle track.<br><br>Access and egress to the proposed new housing development (Willsbridge 2) will have a huge impact onto a narrow country lane.<br><br>This Green Belt land has been used for animal feed but is well used by dog walkers, which presents its own problems with the amount of dog faeces left on the ground or in poo bags. It's already like an open sewer. If at least two thirds of this land is developed for housing, this will potentially increase the number of dog owners, putting more hazardous faeces into a more concentrated area. If the remaining land is to be preserved as publically accessible open spaces, then any extra concentration of dog faeces poses an increased risk of a huge number of health risks to humans, including faecal coliform bacteria and toxocariasis. We know from experience that you cannot stop people from emptying their dogs in these areas – we have witnessed people cutting down fences and hedgerows to get into the existing fields.<br><br>Changing the use of the lower fields from Green Belt to Brown Belt will only put remaining Green Belt under threat.<br><br>Providing sports facilities is likely to result in increased light pollution from floodlights etc.<br><br>What are the suggested times for use of these facilities? Will they be open long into the night for example? If so, this increases traffic movement, noise and light pollution in an area that is currently peaceful for wildlife.<br><br>People are unlikely to use the proposed new walkway to the sports facilities across fields in bad weather or at night, inevitably they will want to drive, thus increasing road traffic.<br><br>Why do you need to make any changes to the top sloping field boundary to deliver sports facilities as the area designated for sports is lower down?<br><br>Is there likely to be a bar provided at the sports facilities? Are they likely to be used as a concert venue for example? If so this will only add to people drinking and driving, noise and light pollution, litter etc.<br><br>Please seriously consider these objections. It should not be all about money but about respect for people and 'quality of life,' of which we only have one. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Cheralyn Thomas |
| **Comment ID** | 19883745/1268 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Please don't ruin Hanham Abbotts with loads of Affordable Housing. Hanham at the moment is a very nice place to live. It would devalue property, cause traffic problems as the roads are already narrow and dangerous. The Health Centre and Schools are at capacity. I support Hanham and Longwell Green Voice. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Debbie Baker - Defence Infrastructure Organisation |
| **Comment ID** | 19836897/1270 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | On reviewing the proposed Rural Growth Places for investigation: Cold Ashton falls within the Statutory Height 91.4m and Birdstrike Safeguarding Zones surrounding RAF Colerne and Marshfield falls within the Statutory Height 15.2m and Birdstrike Safeguarding Zones surrounding RAF Colerne.<br><br>**The MOD would require future Consultation for any proposed developments within these areas which may exceed 91.4m in height (Cold Ashton) and 15.2m in height (Marshfield) or include the development of open water bodies, the creation of wetland habitat, refuse and landfill sites.**<br><br>The remaining areas within the Document regarding Rural Growth Places for investigation all fall within sites outside our Safeguarding Areas (SOSA). However they are within areas where low flying military activity may take place.<br><br>**Therefore any proposed development exceeding 50m AGL at these locations should be referred to this office for review.**<br><br>Please note the above Comments are purely related to the DIO Statutory Safeguarding interests. I trust this adequately explains our position on this matter. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Malcolm & Jill French |
| **Comment ID** | 19173345/1276 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Proposal to build houses on Land Adjacent to Castle Farm Road, Hanham, South Glos.<br><br>Case Ref.<br><br>We would like to express our dismay at the proposal to build up to 200 homes on Land off Castle Farm Road.<br><br>Firstly we would like to protest at the way this proposal has been handled. There was, apparently, a meeting at the Hanham Community Centre where this matter was first brought up. There was no publicity about it and the only reason we found out about this meeting was when a neighbour called in with information about this proposal.<br><br>I have scoured and spent much time following links on the South Glos website trying to get more information only to be met with a lot of superfluous information which had no bearing on this particular development. I am a lay person, not au fait with Planning matters and I feel your site could be made a lot simpler to navigate for the uninitiated.<br><br>We feel the plans to build up to 200 houses on the Green Belt off of Castle Farm Road is seriously flawed.<br><br>Briefly, the amount of traffic generated by such a development will grid lock an already congested area not to mention the construction traffic. The infrastructure, roads, health facilities, Schools etc will be unable to stand the pressure.<br><br>We feel the whole idea of building on this land is ill judged and ill thought out.<br><br>We will submit further detailed observations once a formal Planning Application has been submitted. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mark Curtis Dip FA MIFS CeLTCI MAQ |
| **Comment ID** | 19778721/1277 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Hello,<br><br>I live in  and feel that any mass development in a Conservation Area and with many Grade 2 Listed homes is completely unacceptable.<br><br>The heritage, historic feel and village aura would be lost forever alongside the habitat for so many birds, animals and wildlife in general. |

| | |
|---|---|
| | The original Plans were very misleading stating “North West Yate” which “Iron Acton” certainly is not part of Yate and is very much independent in its own right.<br><br>The village has a lack of infrastructure and I feel that areas nearer to Lyde Green/Ashton Vale have much more appetite and facilities to cope with new homes there instead of ruining such a beautiful village. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mr. and Mrs. Martin |
| **Comment ID** | 19840097/1278 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Dear Sir or Madam,<br><br>We are residents in the area and would be impacted directly by the proposed development sites called 'Land to the North of Abbots Road/Court Farm Road' and 'Land Rear of Mount Pleasant Farm and Longwell Green.'<br><br>We are extremely concerned about the increase in traffic in the area which would be caused by these developments and their access points. Court Farm Road has a narrow point on it where it reduces to a single track. The rest of the road between Longwell Green and Hanham is also very narrow and winding. This road is used as a 'rat run' by many commuters in the morning and evening. It is incredibly busy. Any further car flow to this area is likely to lead to huge tail backs and jams, particularly as one of the developments has two access points directly onto the road! Already, drivers have screaming matches, drive aggressively, drive at speed, and purposefully block each other at this point all whilst aggressively beeping. There are houses whose drives lead on to this road and it is already difficult enough to get out onto the road (holding up angry drivers at the same time as making a very difficult turn) without adding even more traffic! In addition to this the road users, in an attempt to get through this narrowing, push as far along the road as they can before pausing, utilising residents' driveways as passing points thereby destroying the bottom of driveways. This destruction of private property is only likely to get worse if more traffic flow is added.<br><br>Furthermore, given the nature of the area (although it appears it is likely that this may well be destroyed) people like to take walks in the area. Court Farm Road is a very common route for walkers to use to get to the common land behind (i.e. 'Land Rear of Mount Pleasant Farm') and to the two local Pubs by the river along with the riverside walks. This is already dangerous enough with the level of traffic as there is no footpath. The proposed developments would add more traffic and more local residents who may like to walk to their local shops and the riverside who will be forced to walk on the road as there is no path that covers the whole route. There are some paths across the fields however, clearly these are not suitable for pram or wheelchair users, thereby forcing these residents to stay at home or risk being on the road.<br><br>Additionally, as has already been alluded to, the common land known in the Plans as 'Land Rear of Mount Pleasant Farm and Longwell Green' is very popular with local residents for walking. The Development Plans talk of helping to create amenities such as open spaces, parks and sports facilities. Which is ironic considering this well loved local amenity would be destroyed for ever for all local users!<br><br>Given the huge infrastructure issues and the appalling idea of destroying local common and Green Belt land so that more people can enjoy the then non existent common and Green Belt land, we believe these areas should not be built on at all. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Pauline Gibson |
| **Comment ID** | 19778977/1279 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Local Plan 2018 for Hanham:<br><br>Having attended the meeting at Hanham Folk Centre on 8th March 2018, I was appalled at the proposed suggestion for building on the Green Belt which surrounds the Ring Road.<br><br>These areas of Green Belt land provide a much needed relief from the incursion of current building projects i.e. Springfields and the proposed new homes in Greenbank Road. These fields are used by many of the local people and those from further afield for all sorts of recreation. Whether that be walking, riding, or just enjoying the fauna or flora in the area.<br><br>In the past years I have watched wildlife disappear. Before Hanham Hall was developed, bats would visit most days. Gone are the swifts and swallows that would swoop above us. I ask what would more development do to the rest of the wildlife which inhabits these field/woods.<br><br>Hanham is described in the Applications as, and I quote, “a small village.” By approving this Plan that will no longer be the case.<br><br>We have one Doctor’s Surgery which is over subscribed. To see a Doctor for a non-emergency appointment can take up to two weeks. |

| | |
|---|---|
| | The local Schools are full.<br><br>Roads are horrendous. Hanham High Street in particular, being the main route into the centre of Bristol. There are no facilities for Park and Ride or even the proposed MetroBus.<br><br>Access to the proposed sites would put more traffic onto what is already an exceptionally busy route. I again draw your attention to the new Springfields development and the problems of cars joining the main A431 just after the roundabout on Bath Road. The road is very narrow at this point and there are even now tail backs from the traffic lights at the Junction at Homebase/Wickes. This is before the development is finished and people living there. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Gill Penberth - Tormarton Parish Council |
| **Comment ID** | 19943937/1286 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | **SOUTH GLOUCESTERSHIRE LOCAL PLAN 2018 – 2036**<br><br>**Consultation Response of Tormarton Parish Council (TPC)**<br><br>**General Comment**:<br><br>It is TPC's understanding that until this Local Plan has been finalised areas of land identified by owners in S. Glos. Council's(SGC's) *Call for Sites* are vulnerable to development by speculative developers. Should Tormarton or West Littleton be affected in this way TPC requests that SGC fully considers the wishes of the residents of these two villages that were expressed anonymously in the Parish Plan (Tormarton & West Littleton Parish Plan, 2010). Information in this Plan was based on a Response rate from Tormarton and West Littleton residents of 83% and 74% respectively who had a demographic profile similar to that recorded in the Parish Census (2011 Census Profile, Office for National Statistics publ. 2013).<br><br>The key facts in the Tormarton & West Littleton Parish Plan that relate to housing and development are:-<br><br>o 33% of residents in the Parish overall and 60% of those who live in West Littleton want no more houses.<br><br>o 60% welcomed the re-use of redundant buildings.<br><br>o 35% wanted no further development.<br><br>o 95% felt that there should be no development on existing agricultural land.<br><br>o Priority of any development should be given to housing for young people and small family houses.<br><br>Therefore in carrying out the community's wishes TPC would oppose any large scale housing development that was proposed in Tormarton.<br><br>**Park and Share Site Proposed at Tormarton - PP 45 - 46, PSP15:**<br><br>Being close to the M4, parking in and around the village of Tormarton has been a major problem affecting the owners of the Compass Inn and villagers for more than 10 years. This has resulted in frequent dangerous parking in nearby lay-bys and roadside verges, substantial and disruptive parking in Tormarton Village and a condequential litter problem in the affected areas.<br><br>Consequently, TPC and Cllr. Sue Hope have consistently lobbied for many years for a Park and Share site in this area.<br><br>Section 5.57 of the Policies Sites and Places Plan (Adopted November 2017) proposes to formalise a Park and Share site close to the M4 Junction 18. Subsequently, two Officers from SGC attended a TPC meeting on 9th April and explained that this site would need to be funded as part of a commercial development as there was no money available from the Council for a Park and Share Site. TPC was asked for a formal Response to this proposal, which is as follows.<br><br>In principle, TPC has no objection to the development of a petrol station, shop and/or café, or similar business on this site provided that the following conditions are met:- |

| | |
|---|---|
| | o Retain the development site in the Green Belt (GB) - the previous SITA digester proposal did not require a change in GB boundary and no plausible explanation was given by the Officers as to why a GB boundary change was now necessary.<br><br>o Style of the building(s) to be in keeping with the Cotswolds AONB.<br><br>o Single storey construction.<br><br>o The complete development is screened by several layers of trees planted at the boundary.<br><br>o Sympathetic to the surrounding landscape.<br><br>o Minimal light pollution.<br><br>o Access to adjoining farm land unimpeded - modern agricultural vehicles and equipment are very large and adequate space needs to be given for them to have access that is free from parked cars and will enable them to manoeuvre around corners etc.<br><br>o Attend to the safety of Cotswold Way walkers who cross the A46 near the proposed site.<br><br>o Capacity of car park at least 100 (?) cars - publicity of this facility is likely to increase the demand for parking in future, possibly more than indicated in the demand modelling.<br><br>o Control of the Park and Share facility should be retained by SGC - if this is operated by a commercial company they may put inappropriate rules on parking e.g. a time limit on the duration of parking as currently operated in Yate Shopping Centre.<br><br>o A reasonable parking charge.<br><br>o Provision of litter bins that are regularly emptied.<br><br>o Place a time limit on nearby lay-by parking.<br><br>The combined proposed commercial premises and Park and Share Site need to be sufficiently large to accommodate both and an appropriately large area would seem to be the middle section of the area that is owned by the Council. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Pat Hinton |
| **Comment ID** | 19780353/1303 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | We all understand that there is a need to increase housing provision, especially social and smaller housing to meet local needs. However, great care must be taken in siting such developments so that they fit in with the local environment and meet the needs of the proposed occupiers. For example, young families with School age children will need housing that is within walking distance of the local School and of course the local shops. This also applies to elderly residents who need central locations where they can shop and socialise so that they can continue to lead independent lives and not become isolated.<br><br>The above are just a few thoughts from resident which I hope can be considered. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Conor Lee - Hannick Homes |
| **Comment ID** | 11945985/1318 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | 11) We have the following Comments on Rural Place No. 34, Wickwar. In terms of meeting the two key Planning issues identified by Para 2.57 of the Draft SGCLP, that is creating sustainable patterns of development and sequential approach to Flood Risk, our Client's Land at Windmill Farm (Call for Sites, Site Reference SG36) is located within Flood Zone 1 and is considered by South Gloucestershire Council to have sustainable access to a variety of key services and facilities. Additionally the site has the key benefit of being located outside of all areas which indicate that |

| | |
|---|---|
| | development should be restricted in accordance with the Framework4 including Sites of Special Scientific Interest (SSSI), the statutory Green Belt or AONB. As noted above, Wickwar is one of the most sustainable settlements located outside of the designated Green Belt.<br><br>12) There are numerous services and facilities in Wickwar, including three dedicated community centres, a Post Office, Holy Trinity Church, The Buthay Public House, Bed and Breakfast, Wickwar Tea Rooms, antique shop, Primary School, King George V Playing Fields with pavilion, nursing and residential care homes, congregational Chapel, a social club, hairdressers, newsagents, petrol station, town and village hall and Doctor's Surgery. Wickwar also benefits from suitably frequent and timed Public Transport connections to Yate and Wotton-Under-Edge that can assist sustainable access to additional services and facilities, particularly retail, health and employment in the surrounding areas.<br><br>13) The Sustainability Access Profile for Wickwar (updated February 2018) and the Sustainable Access – Village and Settlement Findings 2018 in the Evidence Base, acknowledges that within a 1,200 metre walk or cycle there is also access to one comparison retail shop and a smaller scale food store. Furthermore, employment opportunities exist at two safeguarded employment areas within Wickwar, with walking and cycling access available to the Old Cider Mill Trading Estate and Arnolds Field Trading Estate. These light Industrial Estates provide employment in engineering and machining, ceramics, brewing and distribution. Our Client's land (Windmill Farm) is on the edge of Wickwar should be allocated as a location for non-strategic housing growth in the Local Plan for about 45 houses.<br><br>14) Land at Windmill Farm, Wickwar is 2.03 hectares in size. It adjoins the existing settlement boundary for Wickwar and by built development to the North and South. Being part of an established urban area, the site is relatively well constrained from landscape and visual impact, however, consideration will need to be given to the built form along the site's Western boundary which can be managed through proper treatment. The site at Wickwar provides direct access onto Sodbury Road which has existing footway provision to enable future residents to walk to the local Primary School and other services and facilities in Wickwar. We can therefore confirm that acceptable site access can be achieved for vehicles, cyclists and pedestrians and there are no transport issues affecting the site that would prevent its development or delivery.<br><br>4 Paragraph 14, Footnote 9.<br><br>15) The SGCLP establishes there are 585 homes in Wickwar. The site is capable of achieving up to approximately 45 dwellings which could be readily accommodated at this location without significant impact on the scale or character of the area. The homes will be of mixed accommodation and able to meet the needs of some members of the community. The development would make any necessary CIL Payments; at this stage there is nothing to suggest it cannot provide Policy compliant levels of Affordable Housing.<br><br>16) In summary, there are no constraints affecting the site. The site is available, developable and deliverable. Hannick Homes has the ability to start work on the site immediately subject to receiving Planning Permission. Accordingly, this site should be supported for a non-strategic growth housing allocation in the Local Plan. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hanham Community Trust (Land at Hanham Community Centre) |
| **Comment ID** | 19926241/1330 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Site 3 (Land North of Abbots Road) falls within the Longwell Green Urban Edge Location that is identified within the Draft Plan as a potential Non-strategic Development Location.<br><br>The Sustainable Access Profile (2018) shows that this location has accessibility to a community centre, Public House, Post Office and Pharmacy within 800m, whilst there are further employment facilities at Longwell Green Retail Park, Hanham Town Centre and three safeguarded employment areas. It also finds there are a number of frequent and well timed bus services to nearby Town Centres on both weekdays and weekends.<br><br>As part of a wider scheme with three sites coming forward, Land North of Abbots Road is proposed to deliver the relocated Hanham Sports Ground, which will provide junior football pitches, a rugby pitch, bowling green, tennis courts, sports pavilion and parking. Alongside this, around 4.2 hectares of land is proposed to deliver lower density family sized housing to match the site's urban edge location. Publically accessible natural open space will also be provided to the North of the site, which will act as a landscape buffer to the raised topography at Hanham Hills.<br><br>With these points in mind, the site North of Abbots Road is considered a suitable and sustainable location to deliver new sports and community facilities, along with non-strategic housing growth of around 100 dwellings. The site scores well in sustainability terms and development is proposed on parts that are largely flat and unconstrained. The proposal will also link in with the wider community aspirations for Hanham Community Centre and the nearby Sports Ground. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hanham Community Trust (Land at Hanham Sports Ground) |
| **Comment ID** | 20104449/1355 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Site 3 (Land North of Abbots Road) falls within the Longwell Green Urban Edge Location that is identified within the Draft Plan as a potential Non-strategic Development Location.<br><br>The Sustainable Access Profile (2018) shows that this location has accessibility to a community centre, Public House, Post Office and Pharmacy within 800m, whilst there are further employment facilities at Longwell Green Retail Park, Hanham Town Centre and three safeguarded employment areas. It also finds there are a number of frequent and well timed bus services to nearby Town Centres on both weekdays and weekends.<br><br>As part of a wider scheme with three sites coming forward, Land North of Abbots Road is proposed to deliver the relocated Hanham Sports Ground, which will provide junior football pitches, a rugby pitch, bowling green, tennis courts, sports pavilion and parking. Alongside this, around |

| | |
|---|---|
| | 4.2 hectares of land is proposed to deliver lower density family sized housing to match the site's urban edge location. Publically accessible natural open space will also be provided to the North of the site, which will act as a landscape buffer to the raised topography at Hanham Hills.<br><br>With these points in mind, the site North of Abbots Road is considered a suitable and sustainable location to deliver new sports and community facilities, along with non-strategic housing growth of around 100 dwellings. The site scores well in sustainability terms and development is proposed on parts that are largely flat and unconstrained. The proposal will also link in with the wider community aspirations for Hanham Community Centre and the nearby Sports Ground. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | A. T. Bennett & Sons |
| **Comment ID** | 19926433/1361 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Please see attached Representations. |
| **Attached documents** | A. T. Bennett and Sons - Origin3 (Mr. Alex Cave).pdf (1.0 MB) |

| | |
|---|---|
| **Respondent Name** | Hanham Community Trust (Land North of Abbots Road) |
| **Comment ID** | 20107489/1372 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Site 3 (Land North of Abbots Road) falls within the Longwell Green Urban Edge Location that is identified within the Draft Plan as a potential Non-strategic Development Location.<br><br>The Sustainable Access Profile (2018) shows that this location has accessibility to a community centre, Public House, Post Office and Pharmacy within 800m, whilst there are further employment facilities at Longwell Green Retail Park, Hanham Town Centre and three safeguarded employment areas. It also finds there are a number of frequent and well timed bus services to nearby Town Centres on both weekdays and weekends.<br><br>As part of a wider scheme with three sites coming forward, Land North of Abbots Road is proposed to deliver the relocated Hanham Sports Ground, which will provide junior football pitches, a rugby pitch, bowling green, tennis courts, sports pavilion and parking. Alongside this, around 4.2 hectares of land is proposed to deliver lower density family sized housing to match the site's urban edge location. Publically accessible natural open space will also be provided to the North of the site, which will act as a landscape buffer to the raised topography at Hanham Hills.<br><br>With these points in mind, the site North of Abbots Road is considered a suitable and sustainable location to deliver new sports and community facilities, along with non-strategic housing growth of around 100 dwellings. The site scores well in sustainability terms and development is proposed on parts that are largely flat and unconstrained. The proposal will also link in with the wider community aspirations for Hanham Community Centre and the nearby Sports Ground. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ms. J. Hillier and Barratt Homes (Bristol) Ltd |
| **Comment ID** | 19740673/1381 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | See attached. |
| **Attached documents** | Ms. J. Hillier and Barratt Homes (Bristol) Ltd - Barton Willmore (Miss. Robyn Nicholl).pdf (792 KB) |

| | |
|---|---|
| **Respondent Name** | IM Land |
| **Comment ID** | 16638625/1401 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | See attached. |
| **Attached documents** | IM Land - Barton Willmore (Miss. Robyn Nicholl).pdf (564 KB)<br>2026 Vision Document 06.pdf (2.2 MB) |

| | |
|---|---|
| **Respondent Name** | ATA Estates (Longwell Green) LLP |
| **Comment ID** | 19740449/1410 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Please see the enclosed Representations in respect of the Local Plan Consultation Document (February 2018). Please note that separate Representations are being submitted in respect of the Consultation on the 2018 Sustainable Access Methodology and the associated Sustainable Access Profiles. |
| **Attached documents** | ATA Estates (Longwell Green) LLP - Walsingham Planning (Mr. Daniel Sharp).pdf (59.8 MB) |

| | |
|---|---|
| **Respondent Name** | Fear Group |
| **Comment ID** | 19927745/1426 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | We consider that the land at Springfield Lakes, fronting Bath Road and Brewery Road in Bitton, to offer good potential as a location for NSD. The land is currently occupied by large steel structures and areas of hardstanding associated with its previous use as a major commercial nursery. There is in particular the opportunity to provide a range of accommodation to meet the needs of older people, including those who require care support, as part of a mixed-use development that also provides facilities for the communities of Bitton and Upton Cheyney. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Daniel Kelly - South Gloucestershire Liberal Democrat Council Group |
| **Comment ID** | 10311137/1439 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Table 1 on Pg 59 identifies Engine Common as a potential non-strategic growth location, despite the fact that it already has a planned SDL (Yate). Westerleigh similarly is extremely close to the Coalpit Heath SDL and, likewise, we believe Cromhall and Falfield are very close to the Charfield SDL. In our judgment, these locations are not suitable for non-strategic growth while they have SDLs planned so nearby. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ian Knipe |
| **Comment ID** | 20133153/1461 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Yes, we consider that our Client's proposals to bring forward a Self Build development adjoining a Golf Course adjacent to the existing Settlement Boundary of Bristol at Shortwood Lodge presents a unique opportunity to diversify the source of supply of new dwellings allocated in the new Local Plan. The Golf Course, which is in the same ownership as the proposed development site, plays an important role in the local economy, as well as assisting South Gloucestershire to meet wider objectives of local and national Policy such as promoting health and wellbeing. The allocation of the undeveloped land adjoining this important local leisure facility for Self Build residential units will enable the existing facilities to be improved and enhanced which would further contribute to the leisure opportunities within the wider area. This will ensure that a local leisure business is supported and deliver various wider associated benefits including employment and recreation.<br><br>Set out below are our Comments providing more information about the site and the rationale behind suggesting that it should be investigated further for its potential to accommodate additional non-strategic growth. Reference should also be made to the attached Development Vision Document (Appendix 2) which sets out further details regarding the suitability of this site for development.<br><br>**Site Description:**<br><br>The site is located to the East of Bristol at the Junction of the A4174 with Carsons Road. An existing vehicular access from Carsons Road serves Shortwood Lodge Golf Course, Lodge Farm and a number of other properties.<br><br>The wider site as a whole extends to approximately 61.6ha, however the proposed developable area at the West is approximately 12.29ha and can accommodate around 250 new homes. These new homes will assist the Council in meeting local needs whilst being in excellent proximity to accessible open space and green infrastructure and retaining a valuable leisure asset in the form of the existing Golf Club.<br><br>**Site Suitability:**<br><br>The site can be suitably accessed by sustainable methods of transportation other than the private car. The proposed developable area of the site is adjacent to a number of bus stops that connect directly to Bristol City Centre and other employment locations in the area. There is also good local pedestrian and cycle links, including connections via local footpaths and Public Rights of Way. The site is very well located to major Retail Centres within the Eastern area of Bristol, within walking distance of local education facilities and in close proximity to a range of sports facilities and pitches.<br><br>Mangotsfield Golf Course Marsh Site of Nature Conservation Interest (SNCI) sits within the site and abuts the Western edge of the Golf Course, occupying much of the lower lying land. However, a detailed botanical assessment and an assessment of the site against the relevant SNCI criteria is being undertaken by a suitably qualified Ecologist and it is likely that suitable mitigation can be accommodated within the development site to allow residential development to come forward on less sensitive areas of the site with no net resulting detrimental impact on existing habitats.<br><br>**Self-Build Opportunity:**<br><br>It is proposed to develop the site predominately for Self Build housing, subject to the agreement of South Gloucestershire Council. There is demand in Bristol and the surrounding area for Self Build, with several local examples of previous schemes such as the Ashley Vale Self Build Project. Shortwood Lodge provides a unique opportunity to meet the need to provide for Self Build and custom build homes. Development on the site will be for households of all sizes & will include opportunities for people to build as a group and as individuals.<br><br>Paragraph 2.52 of the Draft new Local Plan Document acknowledges that the Council needs to ensure it has a portfolio of sites across the District with a wide range of small and medium sites to stimulate new sources of supply such as private individuals or Self Build. This acknowledgement is supported. The diversification of sources of supply will help to ensure that the delivery of much needed housing within the District can be maintained.<br><br>The Council have explicitly stated that it would like to positively encourage self and custom build within the District as this helps to increase the |

| | |
|---|---|
| | provision for housing and also may bring additional benefits such as delivering better design and build standards than some commercial market housing. This intention is set out in the Custom Build Dwellings Policy recently adopted as part of the Policies, Sites and Places DPD(2017).<br><br>The Draft new Local Plan sets out that one of the 'Priorities' for the new Local Plan, under the heading of Population and Housing on Page 14, is to allocate a range of sites including a 'diversity of models including Self Build to ensure maximum delivery by a range of providers.' We support this pragmatic approach by the Council as an appropriate way of ensuring a diversified housing land supply and request that the Shortwood Lodge Development site be removed from the Green Belt to allow its allocation for Self Build residential dwellings.<br><br>In short the allocation of this site for Self Build residential development is an opportunity to achieve wider aims of existing and proposed local Policy whilst also making a substantial commitment to delivery of opportunities for Self Build as required by Government Policy. |
| **Attached documents** | Mr. Ian Knipe - Turley (Jeff Richards).pdf (7.0 MB) |

| | |
|---|---|
| **Respondent Name** | Mr. Mike Kerton - Bloor Homes South West and Mr. Jeremy Sutcliffe - Baratt |
| **Comment ID** | 16646593/1466 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Please see attached Representations. |
| **Attached documents** | Bloor Homes South West (Mr. Mike Kerton) and Barratt (Mr. Jeremy Sutcliffe) - Barton Willmore.pdf (14.6 MB) |

| | |
|---|---|
| **Respondent Name** | Reginald Pearce, Judith Davis & Rachael Shiles |
| **Comment ID** | 19740897/1481 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | 19) We have the following Comments on Rural Place No. 30 in Option 3: Tytherington which is located outside of the Green Belt. In terms of meeting the two key Planning issues (Para 2.57 of the SGLP Draft), it is considered that Land at Tytherington has the potential to provide non-strategic growth proportionate to the size of the village. Enclosed is a Site Location Plan which shows the entire extent of our Client's land holding which is available for development. It is acknowledged that the entirety of this land holding would not be appropriate for non-strategic growth, only those land parcels well related to the village. It is on the basis of these land parcels that this Representation is made.<br><br>20) With regard to access to goods and services, the facilities and services available in the village include a Church, a Village Hall, various recreational areas, a shop, a Post Office and a recently renovated Pub (The Swann Inn). Schools are located in close proximity to Tytherington, within the standard walkable guidelines. Health Care facilities are within 3km and easily accessible in Thornbury, some 10 minutes on Public Transport from bus stops close to the land and village core and which also connect the village to Yate and Cribbs Causeway. There are clear timetables of a frequent bus service which directly connect Tytherington to the Leisure Centre, along with community facilities and shops in Thornbury and Yate, thereby contributing to the vitality of these locations as well.<br><br>21) Furthermore, the Market Towns of Thornbury and Yate are approximately 2.3 and 4.7 miles respectively from the village; Bristol City Centre is approximately 11 miles from the village. There is sufficient provision for sustainable daily living and convenience shopping and leisure.<br><br>22) It is also important to note that part of the available land adjoins the site of Planning Application PT17/2240/F for 28 dwellings at Duck Street Tytherington which has a resolution to grant Planning Permission subject to the completion of a S106 Agreement (expected imminently). This earlier Planning Application was considered against constraint-specific Policies, assessed for its sustainability credentials and determined by balancing the benefits of the proposal against any resulting harm. In its application of the Planning balance, the Council found the proposed development to be located within a sustainable location that would deliver a number of benefits.<br><br>23) The available land on the edge of Tytherington could be allocated as a location for non-strategic housing growth with complementary infrastructure provision relative to the size of the development. In terms of any final quantum of development, it is acknowledged that any allocation would need to be proportionate to the size of the existing settlement.<br><br>24) The allocation of this site for development would result in a defined boundary using physical features that are readily recognisable and permanent such as hedgerows and mature trees. Whilst the land put forward as part of these Representations comprises a large land holding, those fields directly adjacent to the site pursuant to Planning Application PT17/2240/F could be suitable for allocation as these are geographically closer to the village core.<br><br>25) Furthermore, the land in question is outside the village's Conservation Area and any allocation would need to be of a scale commensurate to the size of Tytherington, whereby its allocation would not undermine the general rural character of the existing village or significantly change the local landscape.<br><br>26) The Table in Option 3 in the Consultation Document establishes there are 180 existing homes in Tytherington. The homes will be of mixed accommodation and able to meet the needs of some members of the community. The development would make any necessary CIL Payments; at this stage there is nothing to suggest it cannot provide Policy compliant levels of Affordable Housing.<br><br>27) Having tested land associated with Planning Application PT17/2240/F where no ecological or landscape constraints were identified, it is unlikely that these would also be constraints with regard to the land in question given it lies adjacent to it. The land is available, developable and deliverable. The land owner has the ability to start work on the site immediately subject to receiving Planning Permission. Accordingly, this site should be supported for a non-strategic growth housing allocation in the Local Plan. |
| **Attached documents** | Reginald Pearce, Judith Davis, and Rachael Shiles - Alder King Planning Consultants (Mr. Mark Cullen).pdf (108 KB) |

| | |
|---|---|
| **Respondent Name** | Laurence Parsons |
| **Comment ID** | 18822945/1492 |

| | |
|---|---|
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | *3.4* Do you have any Comments or further information on individual rural places mentioned in this Document?<br><br>Paragraphs 2.30 to 2.46 deal with SDLs. It is odd that we have not been asked to Comment on this key feature of the Strategy. As a resident I feel very strongly about the proposed level of development in my village.<br><br>Para 2.43 states that "it may not be possible to deliver a specific phase of development until a key transportation improvement has taken place or capacity in local School(s) has been increased." I feel that the Council is not able to give any such assurances that these vital infrastructure components will be in place before the house building commences.<br><br>Para 2.44 indicates that the Council may bypass the normal Planning approach where only a single (or very few) landowners control a site. We are aware that this is the main reason for choosing Charfield and want assurance that approving major Planning changes for an SDL by means of a procedure intended for small Planning Applications will not happen. The Council must be seen to be conducting all business in a fair and transparent fashion and leave no scope for any accusations of bribery, corruption or any other underhand dealings. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Melinda Evans |
| **Comment ID** | 10398721/1496 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | **Question 3.4: Do you have any Comments or further information on individual rural places mentioned in this Document?**<br><br>Olveston area.<br><br>I am commenting as and the possible impact of there not being sufficient affordable and/or reasonably priced family housing in the Olveston area to sustain Olveston Primary School.<br><br>Trends in Olveston Parish's population are broadly in line with South Gloucestershire's, and are generally ageing1, see Table A following. Data from the recent Olveston Parish Council Housing Needs Survey1 also shows the number of young people and people aged 25 - 44 are decreasing. This is despite the total fertility rate (TFR) across South Gloucestershire as a whole rising from 1.6 children per woman in 2002 to 2.0 children per woman in 20112. House prices in Olveston Parish are also high: "*The average house price in Olveston [Parish] is considerably higher than the average house price for South Gloucestershire... The median house price in South Gloucestershire for all dwelling types is £205,000 whereas the median house price for the sub district local area which includes Olveston and surrounding Parishes is £319,950*" 1. The combination of the high cost of family-sized homes, a reduction in the number of School-aged children and their parents living in the Parish, and our ageing population has the potential to impact upon the sustainability of our local School.<br><br>_____<br><br>[1] Housing Needs Survey Report, Olveston Parish, March 2016: https://consultations.southglos.gov.uk/consult.ti/Olveston_LHNS/consultationHome<br><br>[2] Office for National Statistics website: https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/livebirths/bulletins/birthsummarytablesenglandandwales/2016<br><br>**Table A: Olveston Parish Council Age Structure**<br><br>Please see the attached Document for Table A.<br><br>When started attending Olveston School in 2010, the Reception Class was oversubscribed (so + pupils wanting a place). Compare this with the confirmed incoming cohort of for the September 2018 intake, of which a very small proportion (10%) live in the village itself. This is a continuation of an overall decreasing trend for the Reception intake over recent years. Schools are funded based on the number of enrolled pupils. In combination with Central Government's sustained and increasing funding squeeze on Schools in South Glos, Olveston School is now at risk of losing a Class Teacher at a cost to the educational needs of its pupils. This is in addition to the loss of Support Staff over the last few years. Children not being able to attend their local School also has the knock-on effect of fewer children being able to walk to School, increasing car journeys with all the negative outcomes this brings to bear on communities including environmental and health impacts and traffic and parking congestion.<br><br>Along with our shops in the village and the Church, having a School in the village is crucial to sustaining the vitality and diversity of our local community. Olveston School's most recent Ofsted rating is 'good' and thus similar to Schools in the area. It is a distinctly rural village School with a very hardworking team of Teachers, staff and Governors who aim to give its pupils the best start it can. With its good Schools and close links to Bristol, Real Estate Agents often describe Olveston as a "highly sought-after village." However, at this point in time this is not being translated into a School that is operating at its most effective, with the possibility this could worsen based on current trends. The suggestion made here is that if current families are unable to upsize their homes within the community due to a lack of supply of family-sized reasonably priced housing, or new families cannot afford to relocate to the community, then our local School has an uncertain future. |

| | |
|---|---|
| | New affordable or reasonably priced family housing (that stays affordable and reasonably priced) in and around Olveston could be part of the solution. However, it should be based on need and not commercial interests, and be built in a carefully planned and staged manner so as to not overwhelm existing residents, services and infrastructure. Halting Biodiversity loss is also a significant concern and so any development should be carefully assessed to minimise impact and enhance our local natural capital, at all times.<br><br>Thank you for the opportunity to Comment.<br><br>Supporting Information:<br><br>As if to emphasise the point, this Article appeared in Sunday's Observer "Millennial housing crisis engulfs Britain."<br><br>https://www.theguardian.com/society/2018/apr/28/proportion-home-owners-halves-millennials?utm_source=esp&utm_medium=Email&utm_campaign=GU+Today+main+NEW+H+categories&utm_term=273132&subid=13123235&CMP=EMCNEWEML6619I2 |
| **Attached documents** | Mrs. Melinda Evans.pdf (404 KB) |

| | |
|---|---|
| **Respondent Name** | Caroline White |
| **Comment ID** | 17228929/1499 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Yes!<br><br>**Hanham Urban Edge:**<br><br>**Sites identified are:-**<br><br>**Hanham Cricket Club, Call for Sites Ref: SG82:**<br><br>Firstly, this land has previously had failed Planning. There were issues about how much of the site could be used because Planners wished to retain views of the Hanham Hills.<br><br>The Community Centre which owns the land, I believe, has Deeds which prevent the selling of the field unless there is no further use for it or a suitable alternative is found. Local legislation required that an alternative is to be provided before the development of any playing field is permitted. Certainly not achievable within the 5 year time frame claimed in the Representation.<br><br>The Form states that the land is in single ownership, but I understand there is a strip of land at the entrance, and part of the car parking area is owned by South Glos Council.<br><br>I support the view that the Cricket Field should become a designated Green Space to preserve the open aspect to Hanham Hills, and because the Cricket Field here is ideally situated for the people of Hanham.<br><br>It is very close to bus stops and local shops. It can be safely and easily accessed on foot.<br><br>It has a Clubhouse, parking and recently had a Grant to improve the facilities. It is also a tennis club.<br><br>When the Representation was revealed last year a Petition was signed by 1,200 local residents who opposed the proposal. The names of the objectors are held by MP Chris Skidmore.<br><br>**Land at End of Castle Farm, Call for Sites Ref: SG32:**<br><br>This is Green Belt land.<br><br>It is adjacent to a Site of Special Scientific Importance.<br><br>The PSP states that: |

*"Development proposals which would directly or indirectly have an adverse effect on the nature conservation or geological interests of a Site of Special Scientific Interest will only be acceptable where the benefits of the development at that location clearly outweigh both the impact on the site and on the wider national network of SSSIs.*

*Development proposals will have to demonstrate that there are no reasonable and satisfactory alternatives, including that of locating it elsewhere."*

It is adjacent to two Grade 2 Listed Buildings and would affect the setting of these.

Road access is poor and road widening would affect the setting of these Listed Buildings.

The site is frequently used by walkers enjoying the PROW in a beautiful rural setting.

It is a 20 minute walk to the nearest bus stop.

**Longwell Green Urban Edge:**

Development in this area was rejected for strategic development in the JSP due to:

*Heritage – Hanham Conservation Area to the Southern part of the search area.*

*Landscape – Important hilltop with extensive views to and across the surrounding urban areas.*

*Ecology - Impact on SNCIs.*

.

*Green Belt – Development up escarpments and over hilltop would have significant impact on objectives of the Green Belt.*

**Sites Identified are Land North of Abbots Road, Call for Sites Ref: SG105:**

This Area has been the subject of multiple Planning Refusals by the County Council which resulted in a legal case by Kingswood Borough Council against the landowner.

There were objections to development of the land by the Ministry of Agriculture, CPRE, HAP Council, The Green Belt Conservation Society, residents, English Heritage, Avon Wildlife Trust, The Coal Authority and Highways and Transport Planning.

Reasons for Refusal -

Green Belt no special circumstances.

Detrimental to visual amenities.

Adverse effect on the Hanham Conservation Area, where open land is an integral part of the Conservation Area.

Divorced and unrelated from existing pattern of development.

Detrimental to landscape and character and quality of Hanham Hills.

Inadequate roads.

Road changes not in keeping with the Conservation Area.

Sites of Archaeological Importance.

Loss of agricultural land.

The  Submission for this area is for a housing development of high quality housing in a landscape setting. A mix of semi-detached and detached properties. Also proposed are a cricket field, tennis courts, football pitches, rugby pitch and bowls, club houses and parking.

I object to this for all the reasons Planning was previously Refused.

In my opinion Hanham does not need more large expensive houses dependant on car transportation. It needs more Affordable Houses in locations near Public Transport, and services. Development in this area will only benefit those seeking to make a profit from the sale of the land. For local residents it would represent the destruction of an important cultural and landscape asset.

The Representation from  is full of inaccuracies, omissions and misinformation.

The area is referred to in the Document as 'Willsbridge.' This seems a deliberate attempt to deflect attention away from the fact that this is the Hanham Conservation Area.

There is a marked contrast between  bland description of the area and the following from South Glos Council Planning Dept:

*'The Hanham Conservation Area comprises four building groups and adjoining open land located in an attractive rural setting at the foot of the Hanham Hills and stretching down to the Northern bank of the River Avon at Hanham Mills. Designation seeks to protect the character and rural setting of St. Georges Church and the fine group of Listed Buildings at Hanham Court, the building group at Bickley Farm, Court Farm and along the river front at Hanham Mills.*

*The Area is approached by twisting narrow lanes bounded by pennant stone walls and hedgerows and despite being located close to the built-up area at Longwell Green, it has an essentially unspoilt rural character.'*

*The PSP states that 'In determining Applications, Local Planning Authorities should require an Applicant to describe the significance of any Heritage Assets affected, including any contribution made by their setting.' As a minimum the relevant historic environment record should have been Consulted and the Heritage Assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include Heritage Assets with archaeological interest, Local Planning Authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.*

All absent from the  Representation.

 state that 'The site is currently farmed, open fields and as such has little recreational, Biodiversity or ecological benefit.'

It has not been farmed for many years.

The proposed residential development is on a designated area of nature conservation importance – neutral grassland. This meadow and the surrounding fields are wildflower rich grassland. Important for the conservation of insect life, and other important species as laid out in the Hanham Abbots Parish Biodiversity Action Plan and identified as a priority Habitat.

The ancient hedgerows are rich habitats in a field layout which can be predated to a Map of 1843 where each field has its own name.

There is no mention in the Document of archaeological sites.

The site is a designated site of Archaeological importance, in the former Kingswood Local Plan. The following sites have been recorded:

Settlement earthworks at Hanham Green;

Medieval Hanham Green;

Site of Medieval farmstead;

Medieval green;

| | |
|---|---|
| | Site of Neolithic occupation and finds, Hanham.<br><br>Regarding the proposed extensive sports facilities -<br><br>'The siting of sports facilities here would have a demonstrable impact on the rural characteristics of the Conservation Area at this point. With the introduction of parking, lighting, club houses, boundaries fencing all having an urbanising effect on the landscape. Not to mention the impact on Public Rights of Way.'<br><br>There would be increased traffic in the area. There are no pavements on parts of Abbots Road/Court Farm Road in the area. The narrow lane is bounded by stone walls, which makes pedestrian access to the proposed sports facilities inconvenient and unsafe. There is no Public Transport to the site.<br><br>claim there is easy access from the site to the A431. This is untrue, the access to the A431 (Ring Road) is possible only via Hanham or Longwell Green at the Aspects roundabout a good 10 minute drive away, despite the road running close to the site at a lower level in a cutting.<br><br>*The Consultation (Paragraph 2.50) states that non-strategic growth will need to be sensitive to the existing scale of each settlement and have a positive impact on the character and function of communities. Not to be of a scale that would lead to a strategic change of a rural place. … Seeking to avoid harm to built and physical assets – heritage, ecology, local character.*<br><br>The proposal is at odds with all of these.<br><br>Any development here puts the whole of the Hanham Hills at risk of being lost altogether as a green space.<br><br>I belong to a group called Keep Hanham Abbots Special (which will likely become Friends of Hanham Abbots Conservation Area). We have set ourselves up in the last year, because we feel passionately about preserving the Conservation Area for all to enjoy. We meet regularly to discuss what we can do to enhance the character and appearance of the area. We have started to have working parties and have so far exposed the frontage of the Village Pound which was completely overgrown with ivy. We are now clearing verges to expose the stone boundary walls. We are working to raise and secure funding to make further repairs and improvements.<br><br>**Mount Pleasant Farm: SG41:**<br><br>This site is Green Belt.<br><br>Part of Mount Pleasant Farm which falls outside the Green Belt is currently being developed. Further development would encroach onto the escarpment of the Hanham Hills.<br><br>*'Development of this area would see the loss of 'a local landmark and important open space, prominent from the defined urban edge of Hanham and Longwell Green and within Southernly views of Kingswood. In conjunction with open fields and public open space to the West, this area forms an important rural buffer to and the skyline from the urban edge.' Quote from South Glos Council Avon Valley Landscape Assessment.* |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Jeremy White |
| **Comment ID** | 19936257/1506 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | The Hanham Cricket Club field should be a designated Greenfield site. It is easy to access by foot or Public Transport. It is a valued local amenity which adds to the mix of community assets. I understand there has been immense local opposition to the proposed relocation of the cricket and tennis clubs and that 1,200 signatures were given to the Petition against the relocation proposal.<br><br>Road access and local transport links are poor to the sites proposed for development. In particular, the land to the North of Abbots Road. If these historic lanes and buildings are altered as part of the proposed development, it will thoroughly destroy the character of this historic community forever. It is also within the treasured Green Belt. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Berni O'Mahony |
| **Comment ID** | 10194497/1532 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |

| | |
|---|---|
| **Comment** | Question 3.4:<br><br>Hanham (P. 44) yes as mentioned above. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | The Engine Common Trustees (ECT) |
| **Comment ID** | 19741409/1563 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | ln this respect, we have put forward under the Call for Sites on behalf of our Clients a number of sites at locations in Severn Beach; Rangeworthy; Winterbourne; Engine Common, Yate. We commend consideration of such sites for development for housing consistent with the appropriate considerations for the identification of NGS sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | M. S. Howes |
| **Comment ID** | 19741377/1574 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | ln this respect, we have put forward under the Call for Sites on behalf of our Clients a number of sites at locations in Severn Beach; Rangeworthy; Winterbourne; Engine Common, Yate. We commend consideration of such sites for development for housing consistent with the appropriate considerations for the identification of NGS sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Rockfield Farms Limited (RFL) |
| **Comment ID** | 20069217/1588 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | ln this respect, we have put forward under the Call for Sites on behalf of our Clients a number of sites at locations in Severn Beach; Rangeworthy; Winterbourne; Engine Common, Yate. We commend consideration of such sites for development for housing consistent with the appropriate considerations for the identification of NGS sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Downend Estates Limited (DEL) |
| **Comment ID** | 1463137/1599 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | ln this respect, we have put forward under the Call for Sites on behalf of our Clients a number of sites at locations in Severn Beach; Rangeworthy; Winterbourne; Engine Common, Yate. We commend consideration of such sites for development for housing consistent with the appropriate considerations for the identification of NGS sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Janet Ghent |
| **Comment ID** | 19936865/1645 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Dear Sir,<br><br>I wish to add my Comments to the development of Green Belt land especially in Hanham and particularly on the land behind the Riverside Estate.<br><br>I am concerned that not only is more Green Belt land being taken over for housing but also about the access roads on the Riverside Estate. The roads, particularly the narrow section at the bottom of Castle Farm Road by the Farm will not be wide enough to safely take the increased traffic flow, neither will the more residential winding/narrow part of Hencliffe Way by Granville Close/Sycamore Close.<br><br>This will in turn create safety issues in Castle Farm Road and surrounding roads, as well as an increase in noise and pollution issues to what is a quiet Estate in a peaceful area.<br><br>Also building houses so close to the woodlands will spoil the beauty of this area for many people. |

| | |
|---|---|
| | Hanham has had its fair share of new builds in recent years and I think that the time has come to stop before we spoil the woodlands, open rural spaces and Hanham Hills any further. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mark Baldwin |
| **Comment ID** | 19936129/1647 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Dear Sirs,<br><br>I wish to put forward the views of my family regarding the proposed development in Willsbridge below the Hanham Hills.<br><br>This land is part of the Green Belt which is there to protect it from development for the enjoyment of everyone. The proposed development is contrary to Policy PPG2 which is there to prevent the loss of openness of the Green Belt and to prevent housing sprawl.<br><br>From dawn to dusk, this area is enjoyed by walkers and ramblers every day. It represents an open green space between Hanham and Longwell Green and it is not only important to the people but the wildlife it also supports. Developing this GB area would have a severe adverse impact to the wellbeing of people and wildlife. The suggested site is crossed with public footpaths for people to enjoy this area. It is one of the few unspoilt open spaces of natural beauty left.<br><br>This area also takes any deluge of water that washes down from the hills in times of adverse weather.<br><br>The land in question is A2 agricultural land and should remain so. It is adjacent to a Conservation Area and therefore the character of winding road and open space should not be changed. The road (Court Farm Road) is totally unsuitable for the suggested increase in traffic and with narrow pinch points either side of the site, is not even suitable for construction traffic. The road is already signposted 'Unsuitable for Heavy Goods Vehicles.' The road is also not capable of supporting a footpath.<br><br>The local services (such as sewers) are not there to support such a development and therefore major disruption would be imposed on existing local resisdents.<br><br>I urge the Council to reject this proposal and work to protect this valuable local asset, for our future generations to enjoy. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Nicola Gideon |
| **Comment ID** | 19926113/1648 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | I am completely unaware of this Consultation or any proposals to redevelop the area to , which fronts Cotswold Road. I ran a campaign many years back requesting infrastructure improvements to Cotswold Road following 11 injury accidents on the Dual Carriageway over a period of 3 years. This was successful and a Single Lane Carriageway implemented. The current road infrastructure and indeed, all infrastructures in Chipping Sodbury are insufficient to support a housing development on this scale. The development is not in proportion to the area which, as well as being an Area of Outstanding Natural Beauty, is also an ancient Market Town. These proposals need serious consideration and, as a matter of courtesy, neighbours need to be informed, as they would be immediately affected by any development in their vicinity. Where was this advertised and I believe that all neighbours should be contacted by mail, in order that the Representation at any of these public Consultations is indeed fair and appropriate. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Roger and Natalie Flanders |
| **Comment ID** | 19936993/1653 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | RE: East Fringe Urban Area – Hanham/Willsbridge:<br><br>Developing Green Belt in this area will lead to a loss of green space that local residents are proud to live near and an eventual merging of villages leading to the loss of the local identity.<br><br>Moving the Cricket Ground from Hanham to Willsbridge/Longwell Green and development of the proposed new site for extra sports facilities and housing will result in significant increased traffic through Longwell Green. |

| | |
|---|---|
| | There is a stretch of road which is single file from the top of the hill along Court Farm Road on a blind corner.<br><br>There is no pavement and the increased traffic will increase the dangers to pedestrians and all road users. This will in turn force users of the new facilities and home owners to drive to the site through the Longwell Green/Willsbridge area, which will in turn result in further increased traffic. A lot of this will cut up Ellacombe Road past the local School.<br><br>We cycle to work most days down Court Farm Road and along Abbots Road. There is mention of potential for a cycle path along this route. It is hard to see how a dedicated cycle lane would fit in the available space. In addition there are a number of points that are already tight for 2 way motor traffic and of concern for cyclists. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Simon & Heather Earl |
| **Comment ID** | 19836801/1656 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Dear Sir/Madam,<br><br>We have only recently become aware of the proposal to build 180 - 200 new homes on the land behind the existing Riverside Estate in Hanham and it is disappointing that the consultation period expires on 30th April 2018. Such a significant development clearly warrants a far more 'active' Consultation where the local residents are included. Amongst all the issues which need to be considered for a development of this size, appropriate access is clearly a priority but one which appears to have been 'brushed under the table.'<br><br>At present the Riverside Estate is served be a single spine road, Riverside Way, with a secondary access off Castle Farm Road. All other roads within the Estate are subsidiary and provide access only to the houses which they serve. This prevents the smaller roads from becoming too busy and indeed, in Hencliffe Way, it enables the children to play safely in the street and fosters a positive community atmosphere which we encourage.<br><br>The Plans provided for the Consultation indicate a 'potential secondary access' off Hencliffe Way but the text specifically states that this point of access would in fact become the primary access to the additional 180 - 200 houses. Irrespective of the fact that the precise location of the access shown on the Plans is inconsistent, at any point this would fundamentally change the role of Hencliffe Way from a quiet side road into a main thoroughfare. This would represent a significant loss of amenity to the local residents and destroy the currently safe environment.<br><br>There is a statement from TPA (Highway Consultants) which clearly states that a Transport Assessment and Travel Plan has not been prepared and thus their Comments cannot be properly informed. They do not address the increase in traffic to Riverside Way and the fundamental change in status of Hencliffe Way and the impact on existing residents. With regards to Hencliffe Way, two short paragraphs suggest that 'everything is ok.'<br><br>Within the Documentation are several photographs which (understandably) appear to have been taken during the middle of a working day. At such a time most residents are at work and therefore the number of cars present and the parking shown are not representative of the reality during evenings and weekends. The proposed development would clearly generate most of its traffic during these times when the majority of on-street parking already occurs. Most residents have more than one car in their household and although they may have off street parking, in a lot of cases this is not enough and inevitably at least one vehicle is parked on the roadside. At a couple of locations along Hencliffe Way, there are near 'blind' bends where, due to the parked cars, you are unable to see around the bend and with an increased amount of traffic (and by its nature, 'through' traffic) from the new houses, it will make the roads dangerous and inevitably accidents will occur.<br><br>In conclusion we have to object to the proposal. The roads within the Riverside Estate were never intended and therefore never designed for what is in effect a doubling of traffic volumes. The changing in status of Hencliffe Way represents a fundamental change and will result in a significant increase in traffic and loss of amenity; a loss of a safe environment for the residents and real increase in noise and pollution levels. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Taylor Wimpey |
| **Comment ID** | 20068353/1658 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Taylor Wimpey's site at Mangotsfield was previously subject to a Planning Application (Ref: PK09/5811/O) which was Refused primarily due to the site's inclusion in the Green Belt. An Appeal against this Refusal was submitted, albeit that this was Withdrawn (in September 2010) ahead of the Inquiry sitting due to the level of uncertainty in the Planning System at that time following the recent change of Government. Aside from the site's current inclusion within the Green Belt, which is a quirk of historic Green Belt designations and not reflective of the current built form in the immediate context, there are no technical reasons why this site could not be released for residential development. The area no longer truly meets any of the purposes of the Green Belt and is surrounded by existing built form and previously developed land in amenity use.<br><br>Paragraph 2.50 of the Consultation Document identifies that 'non-strategic' development is defined as sites of less than 500 units, and that the scale of proposed development should be sensitive to the existing scale of each settlement and have a positive impact on the character and function of communities. Taylor Wimpey's site at Mangotsfield is very well related to the existing built form given that, despite its Green Belt designation, it comprises an undeveloped parcel of suitable land surrounded by existing properties and amenity uses. The site can be developed without harm to built and physical assets or local character and is of an appropriate size to be accommodated in this location. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | E. H. Schubert Will Trust |
| **Comment ID** | 12403425/1675 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Please see the Call for Sites Submission for further details. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Frampton Cotterell Parish Council |
| **Comment ID** | 20175105/1693 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Frampton Cotterell Parish Council believes that **all** small communities should be allocated growth for small developments whilst keeping individual communities separate and sustainable, working to the Village Design Statements. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | James Lewis RIBA |
| **Comment ID** | 11770657/1728 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | If more land is required for housing then land outside village confines should be assessed for the purpose, NOT land contained within the village. So many of us are controlled by what we are not able to do with our Listed dwellings, that it is essential for the remaining freedom of open space within the village as a whole to be maintained. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | J. Tuffery |
| **Comment ID** | 19935649/1729 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | I wish to support the points raised by the HGBCS particularly in relation to moving the cricket ground to Abbots Road fields.<br><br>I also support their objections to taking land at Castle Farm Road out of the Green Belt. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kathryn Davis |
| **Comment ID** | 19936225/1730 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Firstly, as a resident, I would like to state that I support the views and Reports submitted by Hanham District Green Belt Conservation Society and the Keep Hanham Abbots Special Group. Specifically regarding the Call for Sites Map, I do not believe the sites listed for the Hanham Abbots area should go forward for assessment as they do not align with the Vision, Strategy and Policies set out in the Plan or Joint Spatial Plan.<br><br>And finally, I live at and the proposed development SG32 known as the Batch is directly behind . What an absolute travesty if they destroy the natural habitat of deer, badgers, foxes, owls, bats, slow worms, woodpeckers amongst the many species that we can see from . Why are we considering yet more housing in this area when the infrastructure would not be able to cope? The local Secondary School, Hanham Woods Academy, has recently been inspected by OFSTED and has been judged as INADEQUATE in all areas and the buildings are ageing and in need of a massive cash injection which Section 106 money would not scratch the surface.<br><br>There are often horse riders in this area and the increased vehicular traffic would jeopardise their safety. Hencliffe Way often only has room for single lane traffic because of the parked cars alongside the Knightstone Place flats. Putting in an access road from the proposed development into Hencliffe Way by demolishing an existing house would be dangerous for residents and especially the children out playing in the street.<br><br>In times of increased concerns over Mental Health, the destruction of open green spaces would deny local residents access to free therapy on their doorsteps - fresh air and open spaces to escape the stresses of everyday life.<br><br>I do hope that South Glos Council Staff dealing with these proposals think about the legacy we will leave the next generation of Hanham residents when considering these proposals by land developers who quite frankly do not care about the environment, only their bank balances. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hazel Jones - Hawkesbury Parish Council |
| **Comment ID** | 16665185/1735 |

| | |
|---|---|
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | The threat of development in our rural areas is a reality and puts into question the viability of a sound Local Plan. Villages will be overdeveloped before the end of the Local Plan process.<br><br>The Parish Council believes 499 is far too high a figure for the upper limit for non-strategic developments and that Policies should be put in place to set a much lower upper limit. In rural settings, in particular, a development of that size could destroy the character of an existing community and put unsustainable pressure on infrastructure.<br><br>Growth in the village should not be determined by a single figure or percentage. Policies should be put in place to ensure that, in each case, non-strategic developments are built out over the lifetime of the Plan, and not more rapidly. This slower pace of building out will allow communities to adapt more easily to new housing, and also allow small developers and self-build schemes to compete with larger developers for non-strategic schemes.<br><br>Paragraphs 2.53 - 2.54 indicates that 10 houses is the “lower limit” for a non-strategic level of growth and that smaller sites can be suggested for rural settings, but will not count as non-strategic growth. All development in rural settings should count towards non-strategic growth numbers, with no lower limit.<br><br>Appendix 2:<br><br>Non-strategic growth areas should be constantly kept under review and revised.<br><br>Sustainable Transport matters are constantly changing; the Parish although served by Public Transport, it is unreliable, does not run after 6.00pm nor on Sundays and is totally supported by a threatened Council budget.<br><br>The local village shop is a community enterprise, run with the help of volunteers.<br><br>There is very limited employment opportunities. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hari Seddon |
| **Comment ID** | 19348865/1746 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | I am writing to raise my concerns regarding the proposal for land to be considered for housing at the top of my lane .<br><br>I fully understand that development is inevitable and that there is a housing crisis, so this is not a case of 'not in my back yard' on the grounds of just not wanting the extra houses, as I think that would be unreasonable, and besides it would be irrelevant from Planning perspective.<br><br>However, I do have serious concerns regarding primarily the construction phase of any proposed development relating to the use of the land in question. The land has very poor access - the ONLY existing paved access is down a SINGLE TRACK road at the end of (yes the majority of is wide enough for 2 vehicles, but often it is parked on one side and it is congested even with the existing traffic that uses the road, and most importantly it turns in to a single track before the entrance to the land in question). There is no option to widen the single track portion of the road as it is bordered by stone (possibly Listed?) properties on either side.<br><br>In relation to the houses once they have been built I would also have serious concerns about whether (and the single track portion towards the end of it) is suitable for the additional traffic caused by those extra 200 households, because, as I said above, it is already quite busy. According to the Plans submitted they would intend to use this road as the primary access for the site.<br><br>As I said above, my main concern is in relation to the construction phase - I do not understand how they would plan to build any number of houses (let alone 180 - 200!) without laying pipework etc and this would presumably need to be laid under the road - the only road being , which as I have said is single track.<br><br>We have , all of whom need to be driven to around Bristol and Bath (it's a timing nightmare already) and there are approximately other living down at Riverside Cottages who also need to get to on time, and everyone else has to get to work - we cannot be expected to leave our cars on the other side of the single track bit of road whilst pipework is being laid, it would be too far to walk or a load of shopping, and likewise we cannot be expected to wait whilst they move around barriers or trucks - it would make everyone late.<br><br>I can see from the Plans that there is an intention to purchase 2 or 3 properties from the row of houses in the Riverside Way development, and that perhaps that would be used for laying pipework, but that in the long term the intended main access is through , as I said, a single track, for an additional 200 houses? Seriously? |

| | |
|---|---|
| | Other things I think should be taken in to consideration are that this is an area that many people come to get away from the city lights and the traffic and noise, lots of people come walking around here and it would be a shame to spoil the feel of it with housing. Also there just seems to be SO MUCH other, much more suitable, flat, more accessible land around Hanham, that would seem a more sensible choice. I'm conscious that I'm sounding like a NIMBY now but honestly I feel like building on that plot of land would be a bit ill thought through.<br><br>Thanks for taking the time to read this, I would love to hear back from you if you have Comments or updates on the proposal. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Eastwood Park Limited |
| **Comment ID** | 16634689/1751 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | **Question 3.4 Individual Sites – Eastwood Park:**<br><br>This Section provides commentary on the Eastwood Park land which is the basis of this Representation. The Consultation Document notes as a 'neutral' factor to sites such as Falfield that higher levels of development in these areas would be dependent on rural bus services. This is not seen as a negative issue but is adjudged in the Consultation Document to be less preferable than all facilities being within walking/cycling distance. However, in relation to the Eastwood Park land specifically, and Falfield in general, the continued Policy support for a new Garden Village at Buckover, approximately 2 miles to the South West on the A38 will mean that a significant range of services, facilities and improved Public Transport links (including the MetroBus) will be in very close proximity. Additionally Thornbury is only another 2 miles on from Buckover and is a selected in the Draft Local Plan as a Strategic Development Location (delivering over 6,000 new homes). Both of these development locations will deliver associated benefits to smaller settlements like Falfield and importantly opportunities to grow in a sustainable and appropriate way.<br><br>NPPF Paragraph 55 states that "To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby." It is clear that developments in Thornbury, Buckover and Falfield would lead to cumulative benefits of these rural settlements through proximity and association as well as providing a choice in the types of home on offer. The level of development in Falfield would need to be appropriate to its current size and the Eastwood Park proposals are deliverable.<br><br>It is worth noting here that other constraints that are relevant to all Development Locations in the Draft Local Plan are very limited for the Eastwood Park site. The site is located in Flood Zone 1, is not located in or adjacent the AONB, or close to any Sites of Natural Conservation Interest. Three Listed Buildings/structures are located to the North of the site in Falfield itself but these are not expected to provide any material constraint to the development of this site. Eastwood Park House (Grade II Listed) is over 1 km to the South and again is not a constraint on development due to distance if development is well designed.<br><br>As such, it is clear that the Eastwood Park site is developable and deliverable and adheres to key assessment criteria governing where future growth in the District should be directed. It is located in a Non-strategic Development Location which adheres to all the stated criteria. It should progress through this 'detailed options' stage of the Consultation process and be considered in the next stages of the Plan preparation.<br><br>If you have any questions on the above then please do not hesitate to contact me. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sue Parker |
| **Comment ID** | 19884673/1754 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | I am writing to protest against the proposed plans to develop 180 – 200 houses to the rear of the Riverside Estate, up to 250 dwellings on the Hanham Cricket Field and a further 250 dwellings within the Conservation Area (Hanham Hills, North of Abbots Road).<br><br>I live very close to all 3 areas and travel along Abbots Road to to in Hanham. The road betweeen and the School already contains 3 bottle necks, where traffic has to either slow down or go to single file. Building in these three areas would produce so much extra traffic and aggrevate an already congested route which is used by many as a shortcut to avoid all the traffic lights on the main Bath Road.<br><br>Whenever work is carried out on this route between Court Farm Road and Hanham, the traffic problems it causes is multiplied ten-fold because there simply isn't any alternative routes once you've gone past Ellacombe Road and it's difficult to turn round when the road is so narrow.<br><br>Most residents chose to live where they do because the area is so green and beautiful and building on the Conservation Areas would totally destroy the charm and setting of St. Georges Church and Hanham Court. All the houses over looking the Cricket Club, Hanham Hills and on the Riverside Estate would be devalued.<br><br>I don't think the Transport system would be able to cope with all the extra requirements, the Schools in the area are already over subscribed and the road on which all of the developments would lead onto (Abbots Road) – simply isn't capable of taking that amount of traffic. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | T. K. Hellen |

| | |
|---|---|
| **Comment ID** | 3985729/1756 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | 3. Schools, shops, GPs, Dentists, etc, are already strained, particularly in the outer ring towns and villages. One can build houses(with plenty of developers in the wings) but you can't just build employment (new employers would want good justification to move here when there are plenty of other prime and often cheaper sites elsewhere). Nor can you just open new Surgeries, Hospitals and Schools.<br><br>At the present time, despite some Government rhetoric, the economic growth outlook over the coming years is very uncertain due to Brexit effects and global uncertainty. The number of new jobs in South Glos has not risen much in recent years and has even decreased in Thornbury, as stated above. Therefore, it is hard to predict if any major employer will open new employment centres here which would provide the job increases alluded to, particularly jobs with salaries high enough to pay for the relatively high mortgages the new housing will require. Major employers might well find other, cheaper, areas in England more attractive destinations. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | T. & H. Bishop |
| **Comment ID** | 19139969/1759 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Dear Sirs,<br><br>We feel that any development on Land Adjacent to Hardy Lane and Lower Tockington Road would ruin the character and visual impact of the entrance to the village.<br><br>We understand that there is a need for new houses to be built, but urge you to consider Brownfield sites and areas that have access to good transport links. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | John Allinson |
| **Comment ID** | 19466209/1766 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Dear Sir,<br><br>I wish to submit the following points:<br><br>1. The sewers in New Road and Wotton Road, Rangeworthy, are seriously over stretched and this will only be exacerbated by yet more development. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mr. Michael Savory and Mr. Miles Savory |
| **Comment ID** | 19721665/1798 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Rackham Planning fully support the inclusion of the village of Hambrook as a place for investigation for non-strategic rural growth. The Council's February 2018 Sustainable Access Profile for Hambrook demonstrates that between 2011 and 2017 there has been only a very small increase of 3 in the number of dwellings in Hambrook (47 dwellings in 2011 and 50 dwellings in 2017). This is an increase in the total number of dwellings of just 6% over a 6-year period. This is not considered to be sustainable in socio-economic terms and failure to allocate land for housing in the village could lead to a stagnated or declining population which in turn would put local services and facilities at risk of decline or closure. The village has developed over time, as is common for many rural settlements along well-used roads, and is characterised by ribbon development along the Bristol Road. The village is split into two Settlement Boundaries; one to the North of Bristol Road and the other to the West of it. We note that the Council's Sustainable Access Public Transport Profile for Hambrook demonstrates that the village's Public Transport options are very good for a rural settlement with buses every 10 - 35 minutes linking the village with nearby Yate and the East Bristol Fringe (Emersons Green) with its many employment and shopping opportunities. The bus stops are easily accessible on foot from most locations within the village. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Beryl Downe |
| **Comment ID** | 20182241/1830 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | To whom it may concern,<br><br>I am writing to submit my very strong objection to the possible development on the Land North of Abbots Road and Hanham Hills. Both of which are within the Green Belt and the Hanham Conservation Area. |

| | |
|---|---|
| | I have lived in Parish for over years and in that time a considerable amount of house building has taken place. The proposed development is within one of the remaining rural areas of Hanham. During those years I have had great pleasure and delight in walking on those fields and Hanham Hills with . It is my earnest hope that future generations will be able to do so.<br><br>Main Objection:<br><br>1. Historical Aspect - Hanham began in this area. The Domesday Book records Hanham as having two plough shares.<br><br>2. Roads - Abbots Road is narrow and winding. From the Elm Tree to Court Farm Road there are low dangerous right angled bends.<br><br>3. Sports Facilities - The Plans for the fields show football and rugby pitches and tennis and bowls. This area will only be available to the public taking part in these sports. The only open areas for walkers appear to be on the very steep upper part of Hanham Hills. There will also be pressure on Abbots Road caused by the traffic entering this area.<br><br>I therefore submit my objections for your consideration. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mark Skuse |
| **Comment ID** | 19740097/1833 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Rackham Planning fully support the inclusion of the village of Alveston as a place for investigation for non-strategic rural growth. The Council's February 2018 Sustainable Access Profile for Alveston demonstrates that between 2011 and 2017 there has been only a very small increase of 9 in terms of the number of dwellings in Alveston (976 dwellings in 2011 and 985 dwellings in 2017). This is an increase in the total number of dwellings of just 0.9% over a 6-year period. This is not sustainable in socio-economic terms and failure to allocate land for housing in the village could lead to a stagnated or declining population which in turn would put local services and facilities at risk of decline or closure. The 2011 Census demonstrated that Winterbourne had the lowest amount of working age residents of any Parish in South Gloucestershire(57.7%) and also the highest number of residents over 65 years of age (30.1%). This clearly demonstrates there is a need for family housing to boost the working age population. The village has developed over time, as is common for many rural settlements between well-used roads, as a village characterised by ribbon development along the A38. We note that the Council's Sustainable Access Public Transport Profile for Alveston demonstrates that the village's Public Transport options are very good for a rural settlement with buses every 20 - 35 minutes linking the village with nearby Thornbury and the North Bristol Fringe with its considerable employment and shopping opportunities. The bus stops are easily accessible on foot from most locations within the village. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sally Crosby |
| **Comment ID** | 19925665/1836 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | To whom it may concern,<br><br>It has come to my attention that my local Green Belt and green spaces in Hanham have proposed sites for development, especially The Batch. I would like to voice my concern.<br><br>I am utterly devastated that our protected Green Belt and green spaces could even be considered for development. Where will it end?The impact this will cause is beyond belief. What is the point of having an Area of Outstanding Natural Beauty (which should be protected for life) if it gets destroyed?<br><br>It will affect all the nature and wildlife not only on the sites proposed but also the surrounding areas. I have seen deer, badgers, bats and numerous species of birds on the proposed site called The Batch. Is there no respect for our wildlife?<br><br>How will the local amenities cope, like Schools and Doctors, as they are already overstretched? This will bring them to breaking point.<br><br>There will be nowhere left for children to play, and I thought to stop more child obesity children were being encouraged to do more exercise. Where will that be if we take away all green spaces?<br><br>How will all the rural, small and main roads cope, as they are already extremely busy due to Public Transport being so poor? This will cause the roads that are already in a state of disrepair to get much worse, not to mention the increased congestion this will bring and the raised pollution (congestion and pollution are meant to be going down, not up). |

| | |
|---|---|
| | Why must we lose our lovely villages and surrounding countryside to so much development? If this happens, as with everything sometime in the future, someone will realise it was a mistake.<br><br>Surely there are enough derelict houses, factories, other buildings and Brownfield sites that could be developed without destroying our lovely countryside and green spaces?<br><br>Why do you have to destroy villages that are left in this country with so much development? There are enough big cities without making more. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ralph Starr |
| **Comment ID** | 19937473/1839 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | I have reviewed your proposals for housing development in and around Hanham and would like to make the following Comments:-<br><br>We have lived in  for years and were advised when Hanham Hills were encroached upon that the Hills were considered to be the barrier to further development between Bristol and Bath.<br><br>The current developments planned for the old Kleeneze site and Greenbank Road will put more pressure on local services with roads already heavily congested and very limited parking in Hanham High Street due to the Hanham Community Centre car park restrictions.<br><br>The Cricket Ground is a well established asset for the community, near the Common, local shops and bus stop. It is also a well established all important Green Space for the area, which is becoming very developed.<br><br>The land behind Riverside Estate again was considered to be a corridor for wildlife to access and as a recreation area for local residents and a children's play area.<br><br>I do believe this land should be taken out of the development proposals and would like to register my objection. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Peter Tyzack - Pilning and Severn Beach Parish Council |
| **Comment ID** | 803873/1840 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Hi ,<br><br>At yesterday's meeting I made reference to land which we had submitted as a Parish Council in the Call for Sites, to be allocated as non-strategic growth.<br><br>The land I was referring to was the former railway sidings land at Severn Beach Station.  The desire of the Parish Council being to allow development of the land for housing, with part of the land providing a car-park for commuters using the train services.<br><br>The parking problem in the village is caused by all but one of the former shops having been converted to flats without any parking provision of their own, and the 'shopkeeper's maisonette' above, in every case, also converted to flats.  Those residents' parking needs, plus the numerous commuters from surrounding villages, who also park in Beach Road, means that there is no casual space for the customers of the remaining shops. So provision of a car park in the village is essential.<br><br>Officers within the Transport Team are supportive of the proposal, and have identitifed the land next to the station as the ideal location, but confess that they haven't any realistic chance of finding the funding with there being other more pressing priorities in the Greater Bristol area.<br><br>At one time there was a Planning Permission granted, and whilst it lapsed many years ago the principle of Consent has thus been established.  The land is 'Brownfield,' having been railway operational land, and whilst there may be a question of possible contamination of the land by this former use, it is unlikely to be of significance.  But of course this would have to be investigated.<br><br>Being so close to the River Severn, there is bound to be the issue of Flood Risk, but on various sites around the village the EA have shown widely varying levels of concern.  This site is at the same level as the railway track, i.e. higher than other surrounding land, so I have no doubt that any Flood Risk issues can be overcome or engineered out as a condition of a modern Consent, as at Church Road and Beach Avenue.  Coastal Zone Policy would clearly allow for the use of the site, as it is a use that obviously requires a Coastal Zone location. |

| | |
|---|---|
| | The land is within the Settlement Boundary for the village, which is not Green Belt, though it amply reflects the wider interpretation of infilling within the Settlement Boundary. But the key point is that development of this land for housing could by condition provide the enabling funds for provision of the much needed car park. Additional families in the village would also bring a few more children, from which the School would certainly benefit.<br><br>Therefore it would be most welcome if you could allow this piece of land to be brought forward for development, to:-<br><br>o Bring about much needed infrastructure;<br><br>o Increase train patronage;<br><br>o Relieve parking pressure in the village centre;<br><br>o Benefit the local retailers;<br><br>o Make use of derelict land. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Colin Watson |
| **Comment ID** | 18167905/1841 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Dear ,<br><br>Re: South Gloucestershire New Local Plan - Proposed Strategic Development Locations at North West and West Yate & South Chipping Sodbury.<br><br>I am writing in reply to your letter dated 21/11/2017 dealing with the proposed Chipping Sodbury site on my land. My family and I feel most strongly that we do not want to see this beautiful area of rural Green Belt being developed. Any significant development South of the railway line will destroy the countryside as it rises up to the Cotswolds AONB. The Green Belt was put in place to prevent development on this front.<br><br>Protecting the Green Belt for the benefit of the community and environment is more important to us than any financial incentive. Consequently we object to the Chipping Sodbury proposal and will resist any attempts to develop our farm.<br><br>I understand that the houses are needed so Yate should expand on the North West and West area. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Wendy Shortman |
| **Comment ID** | 19936545/1849 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | I am a resident of & I strongly object to any plans for building new homes in the Green Belt/Conservation Area nearby. This area is a beautiful & historic place used recreationally by many people. The Conservation Area is particularly important supporting an abundance of wildlife & maintaining the history of Hanham Court.The access for vehicles to the Abbots Road/Court Farm Road Plan is particularly worrying. Both approaches (Elm Tree Pub & Sally Barn) are very narrow single lanes which already cause major problems with the existing traffic & I feel the road could not cope with more vehicles (site traffic in particular ). The Green Belt & particularly the Conservation Area need to be protected for future generations to enjoy & I feel the building of these homes would not solve the housing problem as most would be luxury homes.<br><br>I support the views & Reports submitted by Hanham District Green Belt Conservation Society & Keep Hanham Abbots Special Group specifically regarding the Call for Sites Map. I do not believe the sites listed below should go forward for assessment as they do not align with the Vision, Strategy & Policies set out in the Plan or the Joint Spatial Plan.<br><br>SG125 Green Belt by Junction of Court Farm Road/Willsbridge Hill<br><br>SG50 Green Belt Common Road<br><br>SG32 Green Belt Castle Farm Road (Water Lane/Buckley Close/Hencliffe Way/Hanham Hills) |

| | |
|---|---|
| | SG105 Green Belt & Conservation Area Abbots Road/Court Farm Road<br><br>SG283 Green Belt Williams Close<br><br>SG41 Green Belt Mount Pleasant Farm |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Richard Davis |
| **Comment ID** | 19936065/1856 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | I wish to register my objection to the development on Hanham Green Spaces proposed under the Council Local Plan. I agree with the views and Reports submitted by Hanham Green Belt Conservation Society.<br><br>Specifically regarding the Call for Sites Map which shows sites that should not go forward for assessment as they do not align with the Vision, Strategy and Policies set out in the Plan or the Joint Spatial Plan.<br><br>I am particularly concerned about SG32 Green Belt Castle Farm Road. Not only is this Green Belt and should not be built on, but the planned development has insufficient access on to roads not designed for the large amount of increased traffic this proposal would bring. Indeed, the planned development includes the Compulsory Purchase of some houses to facilitate a second road into the new Estate. It seems to suggest that this extra entrance will be almost opposite the entrance to the pre existing flats entrance on Hencliffe Way, forming a cross roads of a junction that from a safety perspective seems ill-advised. The proposal suggests that an entry via Castle Farm Road be used for the initial phase of the development with the Hencliffe Way entry road only necessary for the second stage. It tries to make the case that Hencliffe Way would become the major artery into the new Estate even though the road was never designed for this and that parking on the road ensures that it is only able to cope with traffic in a single direction at any given time. The proposal makes much of the fact that houses in Hencliffe Way have driveways on which to park their cars but this takes no account of those households with multiple cars, residents of the flats and visitors. The reality is parked cars on a road only designed for those residents living there, on what is only a loop onto Riverside Way, will not cope with the additional flow of in excess of an extra 200 family households multiple vehicles.<br><br>It is also worth looking at some of the history of this open green space, one of the few left in Hanham. A couple of years ago local residents endured a Bank Holiday clearance of large numbers of trees and the destruction of wildlife areas when employed by the cleared an area and started that on to houses and resulted in being called. This was done, it was said, in order to prepare the land for agricultural use.<br><br>Which begs the question why would we now want to build on good agricultural land in the Green Belt?<br><br>This Green Belt area currently contains large amounts of wildlife including badgers, foxes, bats, slow worms and various species of birds including barn owls and woodpeckers. It would be a travesty to destroy this wildlife sanctuary.<br><br>Like a large number of the schemes being put forward this appears to be more about landowners, and the companies representing them, making large amounts of money than about providing good housing in the right areas. This whole Council run process seems to encourage landowners to put in for development of Green Spaces rather than the more expensive to develop Brownfield sites. In the last few years Hanham has suffered a number of developments that have left only a few pockets of green space; these need to be preserved and I would urge all local people and our Political Representatives to do all they can to stop these green field developments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Martyn Lewis |
| **Comment ID** | 19721729/1857 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Rackham Planning fully support the inclusion of the village of Rudgeway as a place for investigation for non-strategic rural growth. The Council's February 2018 Sustainable Access Profile for Rudgeway demonstrates that between 2011 and 2017 there has been no increase in the number of dwellings in Rudgeway (99 dwellings in 2011 and 99 dwellings in 2017). This is not sustainable in socio-economic terms and failure to allocate land for housing in the village could lead to a stagnated or declining population which in turn would put local services and facilities at risk of decline or closure. Rudgeway already has a slightly older than average population with the median age being 40 compared to the national average of 39. The village has developed over time, as is common for many rural settlements along well-used roads, as a linear village characterised by ribbon development along the A38. We note that the Council's Sustainable Access Public Transport Profile for Rudgeway demonstrates that the village's Public Transport options are very good for a rural settlement with buses every 20 - 35 minutes linking the village with nearby Thornbury and the North Bristol Fringe with its considerable employment and shopping opportunities. The bus stops are easily accessible on foot from most locations within the village. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Colin Maidment - Wickwar Parish Council |
| **Comment ID** | 19837025/1860 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |

| | |
|---|---|
| **Comment** | Specific concerns to Wickwar of further housing development.<br><br>The need to assess Wickwar for future development needs to be reviewed in light of the current Planning proposals going through. Preliminary Planning Permission has already been given for 80 new houses with a further proposal currently being assessed for another 90. This combination will increase the Wickwar housing stock by a third without the necessary supporting infrastructure. On this basis Wickwar is already taking its fair share of future new housing development and as such should be excluded from future development proposals.<br><br>Wickwar is also not well placed in providing the necessary supporting infrastructure.<br><br>o There are currently very limited residential amenities in Wickwar consisting of one shop whose future is uncertain, one coffee shop, one School which is over-subscribed due to Teacher number funding restrictions from South Gloucestershire Council. There are also no health facilities and one Public House which is looking for a new Publican.<br><br>o The major road which passes through Wickwar is a B Road and is currently being stressed by the current level of traffic without additional traffic from further new developments in Wickwar. It is also worth stating that additional stress on Wickwar road infrastructure will be generated by the major new developments planned in the Joint Spatial Plan for (North Yate, Charfield and Thornbury). These need to be factored into the impact it will have on the Wickwar road infrastructure and Wickwar residents and will need to be addressed by South Gloucestershire Council.<br><br>o Public Transport is limited to one bus every ninety minutes without an evening service or Sunday service.<br><br>o There is very limited employment in the immediate area requiring an increase in car trips and the resulting impact on the environment.<br><br>o As already stated School places in close proximity are over subscribed due to insufficient funding for additional Teachers. This will result in transport requirements for pupils from any new development having to travel outside the area.<br><br>o Wickwar is also adjacent to Lower Woods which is a site of Special Scientific Interest and any future development will need to take this into account.<br><br>o Any proposed development will reduce the agricultural land for food production and the loss of local jobs in agriculture. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mr. Peter Maggs & Mrs. Jeanne Maggs |
| **Comment ID** | 19721825/1866 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Rackham Planning fully support the inclusion of the village of Easter Compton as a place for investigation for non-strategic rural growth. The Council's February 2018 Sustainable Access Profile for Easter Compton demonstrates that between 2011 and 2017 there has been an increase in the number of dwellings in Easter Compton of just 7 (223 dwellings in 2011 and 230 dwellings in 2017). This is just a 3% increase in the number of dwellings in the village. This is not sustainable in socio-economic terms and failure to allocate land for housing in the village could lead to a stagnated or declining population which in turn would put local services and facilities at risk of decline or closure. The village has developed over time, as is common for many rural settlements along well-used roads, as a linear village characterised by ribbon development along the B4055. We note that the Council's Sustainable Access Public Transport Profile for Easter Compton demonstrates that the village's Public Transport options are very good for a rural settlement with buses to designated centres at Bradley Stoke, Filton and Patchway and a direct service taking under 15 minutes to Cribbs Causeway and the North Bristol Fringe with its considerable employment and shopping opportunities. These services can assist sustainable access to key services and facilities missing in Easter Compton itself. The bus stops are easily accessible on foot from most locations within the village. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anthony Molton |
| **Comment ID** | 20185409/1869 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Dear Sir/Madam,<br><br>Re: House Building in the Hanham Abbots Conservation Area:<br><br>I do not have a computer. I suppose I am computer illiterate - hence a handwritten letter - hopefully legible.<br><br>and I have lived in the area for about years and enjoy the environment in which we live. Until recently I was under the impression that the Parish Survey of 2014 concluded that the local Green Belt would be preserved. If this was so, why another Survey? I also vaguely remember a Petition sponsored by the local MP, though I do not recall the outcome. |

| | |
|---|---|
| | To build on these particular Green Spaces around us seems very likely to spoil the area in which we live. These proposed houses and their occupants will need servicing. Roads, Schools, Health Services, local Public Transport, leisure spaces (ironic!), water and sewage etc etc. With these things public living habits will need to be well forecast. E.g. recently I was home with . Whilst washing the dishes, I looked at the road from our kitchen window and noticed that during a short space of time five delivery vans, two from the same supermarket, all making deliveries. Intrigued, I did a count during the afternoon. I was surprised at the number - about twelve I think. Hencliffe Way gets well used by residents and now by delivery vans. I think this is likely to increase in the relatively near future; all on roads not designed for volume traffic and its concomitant problems e.g. parking.<br><br>The area to the rear of where we live, and is a genuine buffer zone and keeps the area open for the local access to Hencliffe Woods. Crops have been grown regularly and the area supports varied wildlife. It's also well used by walkers, dogs, children - all breathing air unpolluted by diesel fumes. Hence the frequent analogy about Green Spaces and healthy living. I also point out that the present access to The Batch is quite limited and I think needs to remain so in the interest of all local families. To remove this area is akin to a Surgeon removing one or two lobes of the lungs - there will be a deterioration in the quality of life. Most articles I read about on this subject note the effects of traffic pollution on air quality and consequently on health generally.<br><br>May I digress to make a relevant contrast to my current environment. When I was a child, I grew up in . It was then a slum area. The terraced house we lived in was condemned at the end of the War. But with and it was over years before demolition began. At that time air pollution was common place, coal fires probably the main cause. Lung disease and general health was not good. I was lucky in that I was probably the only member of not to develop or other breathing problems. , years younger is at still using for problems. It sounds melodramatic but I still remember the local GPs warning the public not to go out in foggy weather unless really necessary. What is significant is that van and car traffic was light; sometimes none at all. British Rail still used horse drawn vehicles. The green areas available were St. George's Park, Eastville Park and Bristol Downs - if you were able to get there.<br><br>Please contrast my current experience with my youth. Here we have Hanham Hills, the Cricket Ground area, The Batch, Hencliffe Woods all contributing to keeping the air quality really good. Think of these areas as lungs for the population. I am sure that what I think will be seen as NIMBYism, but it is not based on my singularity but out of concern for the current and future population. Destroy this environment and you destroy a beautiful part of South Glos. Whatever the future I doubt I shall be around to see it, unless I am particularly . By outlining my past, I am trying to illustrate how much things have changed in about years. Without extremely well thought through Planning using present guestimates of future advances and relevant scientific developments then immediacy driven Planning is risky for everyone. When the houses in Easton were demolished, the population in general were moved to Hartcliffe, Knowle West and later to Southmead - experience tells me it was a social disaster in many ways.<br><br>Please be very careful before changing the green land belt we are so fortunate to have. Maybe start by looking at other immediate options e.g. the site (Kleeneze?) in Hanham. I would imagine lots of things are in its favour.<br><br>I apologise for such a long, rambling letter that is not well structured - but it comes from the way I feel about this lovely area and the people who live in it. Finally I do not envy your task as Planners etc but do hope things will eventually resolve in an amicable and constructive way.<br><br>PS I do not belong to any Political or other type of Focus/Protest Group - and a reply to my letter is not really necessary. I'll assume that someone will read it as some time. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Andrew Harvey - Harvey Shopfitters Ltd |
| **Comment ID** | 16665505/1872 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Rackham Planning fully support the inclusion of Hanham (outside the urban area) as a place for investigation for non-strategic rural growth. The Council's February 2018 Sustainable Access Profile for "Urban Edge Location – Hanham" demonstrates that Hanham enjoys a close relationship to most key services and facilities, some via walking and cycling, and others through Public Transport connections. Availability of Brownfield sites within the Hanham urban area for new housing is extremely limited and unlikely to meet demand over the Plan Period. Therefore, a natural and logical place to look for new housing sites is outside the urban area and particularly Brownfield sites within the Green Belt. Failure to allocate land for housing in Hanham is not sustainable in socio-economic terms and could lead to a stagnated or declining population which in turn would put local services and facilities at risk of decline or closure. Hanham already has a slightly older than average population with the median age being 40 compared to the national average of 39. This trend may continue to rise unless a sufficient amount of high quality family housing is not provided in the local area. We note that the Council's Sustainable Access Public Transport Profile for Hanham demonstrates that the area's Public Transport options are suitably frequent and well-timed with buses linking Hanham with Bristol City Centre, Bath City Centre, Kingswood, Longwell Green and Keynsham on both weekdays and weekends to assist in the sustainable access of the health, retail and community facilities and services missing in the Urban Edge Location by Hanham. The bus stops are easily accessible on foot from most locations within the village. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tony Albon-Crouch - Marshfield Parish Council |
| **Comment ID** | 15617697/1876 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | **Non-strategic Development.** |

The fact that it is 27 years since Planning Policy included looking for housing allocations in villages and market towns is accepted. Marshfield Parish Council's (MPC) Housing Position Statement (see Appendix 1) accepts the need for some housing growth. In terms of numbers, the Local Plan Consultation Document looks for 1,800 new homes (1,300 + 500 contingency) across the Plan Period until 2036, targeted on 35 rural places. 1,800 divided by 35 equals 51.43 and it is worth putting down a marker that we consider that this would be at the very upper limit of what Marshfield could reasonably accommodate. It would be logical to ask the larger settlements to accommodate more homes than the smaller villages. We agree therefore that a proportionate approach to non-strategic development is correct.

**Question 3: Green Belt.**

As noted in the Consultation Document, Marshfield is surrounded by Green Belt on three sides, to the East, South and West. Only land to the North is non-Green Belt (although it is within the Cotswolds AONB).

The A420 to the North of Marshfield forms a logical and practical Settlement Boundary. It maintains the linear historic form of the village and as a busy main highway constitutes a significant barrier restricting access to the main settlement.

***We do not consider that there are any suitable sites for housing North of the A420 at Marshfield and would not support any proposals for development here.***

Discounting land North of the A40, remaining potential development sites are within the Green Belt. Therefore, whilst we realise that Green Belt may be a useful tool to guide the allocation of potential new development on a District-wide strategic scale, locally within Marshfield we do not consider that this approach works.

**Potential New Homes.**

In 2016 MPC adopted a Housing Position Statement, shown below in Appendix 1. In the same year Marshfield Community Land Trust (CLT) became officially incorporated and is a fully functioning and properly constituted body. In accordance with best practice, the CLT is independent of the Parish Council, but both organisations share the same aims and work co-operatively together. The Position Statement recognises the need for a limited number of new homes to meet the needs of local people and the CLT is seen as the primary delivery mechanism to achieve this. The Position Statement will need updating to reflect the evolving South Gloucestershire Planning Policy platform and to accommodate a revised Housing Needs Survey, but otherwise it remains valid. We consider that with regard to new homes the CLT delivers all we could hope to achieve through a Neighbourhood Plan and we have therefore not pursued such an exercise.

The CLT model is locally driven and democratic. MPC consider it essential that the potential to achieve housing growth through this highly desirable method is not undermined through changes in the Emerging Local Plan. The present Planning Policy position allows for the prospect of an 'exception site' development by the CLT (or others) but largely excludes any open-market private development. If the village Settlement Boundary were to be extended, this could mean that sites which the CLT could potentially develop may instead be purchased by private developers, which would deliver a lower percentage of Affordable Housing which is unlikely to meet community needs. Furthermore, the hope value which comes with the prospect of open market development is likely to raise land values all around the village and elevate prices beyond the financial reach of the CLT.

Although it may be beyond the Planning System to require this, it is possible that in any future housing development the CLT may work in partnership with a main developer to bring forward Affordable Housing provision within the scheme.

***Marshfield Parish Council asks that the Settlement Boundary around Marshfield remains un-changed.***

**APPENDIX 1: Marshfield Housing Position Statement, January 2016.**

*In order to sustain the vitality of the Parish, MPC recognises the need for building a limited number of new homes to meet the needs of local people in the current Policies, Sites and Places Plan Period (until 2027). An independent Housing Needs Survey (2013), as accepted by SGC, identifies a need for up to 37 houses for people with a proven local connection.*

*MPC expresses a strong preference for any local requirement housing to be provided within the current Settlement Boundary, but recognises that few sites exist and these may not become available. Restricted building on a site beyond the Settlement Boundary may therefore be necessary. For this reason and to keep options open, MPC endorse SGC's Planning Policy stance for an 'exception site.' This would allow a small-scale development, under local control, to potentially come forward.*

*MPC will therefore potentially support a small-scale housing scheme, preferably led by a community initiative, which delivers a small number of local requirement homes to meet the identified need only. Any new homes should be secured in perpetuity for local people and for this reason MPC favours rented accommodation.*

*Any scheme should be well designed and should not cause harm to the character of the village and will in all other ways conform to national and local Planning requirements including full public Consultation.*

*MPC <u>does not</u> recognise the need for large scale open market housing, will not support any such proposals and will strongly resist them.*

| | |
|---|---|
| | What is an 'Exception Site'? South Gloucestershire Council Core Strategy Policy CS19 – Rural Housing Exception Sites:<br><br>'Proposals for permanent Affordable Housing to meet an identified local need (including a small element of market housing where this will facilitate the successful delivery of the Affordable Housing) will be permitted as an exception on sites where market housing would not normally be acceptable. Proposals should be:<br><br>o Supported by an approved Housing Needs Survey;<br><br>o Well related to a rural settlement;<br><br>o Modest in scale and in keeping with the form and character of the settlement and local landscape setting; and<br><br>o Supported or initiated by the appropriate Parish Council.<br><br>Permission will be subject to Conditions, or a legal obligation will be negotiated, to ensure that the Affordable Housing is reserved in perpetuity for those in local Affordable Housing need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mr. and Mrs. Drew and Mrs. S. M. Bennett |
| **Comment ID** | 19722081/1887 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | As made clear at the outset of this Submission I represent the owners of Land at Cromhall, where Representations have previously been made as part of the adopted process for the Policies, Sites and Places Development Plan Document and the Emerging West of England Joint Spatial Plan (JSP) process (Site Reference: SG121). Furthermore, as requested a new Call for Sites Form has also been completed to reinforce the availability and suitability of this site.<br><br>I am hugely heartened that all the previous Representations about this site forming a suitable location to achieve proportionate growth at Cromhall (thereby assisting the overall sustainability of the village), not dovetails wholly with the Development Strategy envisaged in the LPCD, whereby non strategic growth will take place at suitable villages to help achieve the 1,300 rural dwellings that are required. Cromhall is an ideal village to achieve such proportionate growth that is envisaged in the LPCD, and crucially is an Option 1 village, in that it is located outside of the village.<br><br>As stressed in the Call for Sites Representation, we are most keen to work with the Council (and other local Stakeholders) to detail up the envisaged development principles for this site (a mixed use scheme of some 25 dwellings and 0.2ha of B1 business development), and create a scheme that fully harmonises with the emerging LPCD non strategic site Development Strategy and creates a beneficial form of growth for Cromhall. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tony England |
| **Comment ID** | 20208833/1909 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Please see Representations Document enclosed. |
| **Attached documents** | Mr. Tony England - Barton Willmore.pdf (12.5 MB) |

| | |
|---|---|
| **Respondent Name** | Charlotte Hobbs |
| **Comment ID** | 19936609/1922 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | I am a resident of  & I strongly object to any plans for building new homes in the Green Belt/Conservation Area nearby. This area is a beautiful & historic place used recreationally by many people. The Conservation Area is particularly important supporting an abundance of wildlife & maintaining the history of Hanham Court.The access for vehicles to the Abbots Road/Court Farm Road Plan is particularly worrying. Both approaches (Elm Tree Pub & Sally Barn) are very narrow single lanes which already cause major problems with the existing traffic & I feel the road could not cope with more vehicles (site traffic in particular).<br><br>The Green Belt & particularly the Conservation Area need to be protected for future generations to enjoy & I feel the building of these homes would not solve the housing problem as most would be luxury homes. I support the views & Reports submitted by Hanham District Green Belt & Conservation Society & Keep Hanham Abbots Special Group specifically regarding the Call for Sites Map. I do not believe the sites listed below should go forward for assessment as they do not align with the Vision, Strategy & Policies set out in the Plan or the Joint Spatial Plan. |

| | |
|---|---|
| | SG125 Green Belt by Junction of Court Farm Road/Willsbridge Hill;<br><br>SG50 Green Belt Common Road;<br><br>SG32 Green Belt Castle Farm Road (Water Lane/Buckley Close/Hencliffe Way);<br><br>Hanham Hills:<br><br>SG105 Green Belt & Conservation Area Abbots Road/Court Farm Road;<br><br>SG283 Green Belt Williams Close;<br><br>SG41 Green Belt Mount Pleasant Farm. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | H2 Development Management (Land to Rear of Mount Pleasant Farm, Longwell Green) |
| **Comment ID** | 20377281/1965 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Please see the attached Document. |
| **Attached documents** | Development Management - Tetlow King Planning (Sean Lewis).pdf (5.4 MB) |

| | |
|---|---|
| **Respondent Name** | JFG Gunnery |
| **Comment ID** | 19741793/1976 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Please see the Call for Sites Submission and further details: Land to the North and South of Church Lane, Elberton. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Bristol and England Properties Limited |
| **Comment ID** | 20029953/2006 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Question 3 - Non-Strategic Growth:<br><br>The following Representations are submitted in response to Question 3 of the South Gloucestershire New Local Plan (NLP)Consultation Document (February 2018), relating to 'Non-Strategic Growth.'<br><br>This Representation is accompanied by a 'Call for Sites' Submission, specifically in respect of Land to the North West of Frampton Cotterell (hereafter referred to as 'the site') as depicted on the accompanying Site Plan (**Appendix 1**).<br><br>**Background:**<br><br>The Site:<br><br>The site subject to these Representations comprises a parcel of Land to the North West of Frampton Cotterell, within the neighbourhood of North Corner, to the North of Perrinpit Road and extends to approximately 1.77 hectares in size as shown in **Appendix 1**.<br><br>The site lies beyond the Settlement Boundary of Frampton Cotterell as defined on the Council's Proposals Map, however comprises part previously developed Brownfield land, part Greenfield land, surrounded by existing residential properties, including two more recent residential developments on its South Eastern boundary (Application References: PT16/3466/F and PT06/2188/F). The site is contained by New Farm to the North, by Bristol Road and Perrinpit Road to the South, with the built extent of Frampton Cotterell beyond. Accordingly, whilst technically located within the Green Belt, the site is well contained by existing built form and urban features.<br><br>**Policy Context:**<br><br>National Planning Policy Framework (2012): |

The starting point for determining the case for development at the site is the National Planning Policy Framework (NPPF, 2012), which sets out the Government's Planning Policies for England and how these are expected to be applied.

As acknowledged by the Housing White Paper *"Fixing our Broken Housing Market"* (February 2017), the Government recognises that the housing market in England is *"broken and the cause is very simple: for too long, we haven't built enough homes."* A key objective of the NPPF is therefore to *"boost significantly the supply of housing"* (Paragraph 47).

In respect of the Green Belt the NPPF states at Paragraph 80 that the Green Belt serves five purposes:

i) To check the unrestricted sprawl of large built-up areas;

ii) To prevent neighbouring towns merging into one another;

iii) To assist in safeguarding the countryside from encroachment;

iv) To preserve the setting and special character of historic towns; and

v) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Paragraph 83 continues that *"Green Belt boundaries should only be altered in 'exceptional circumstances,' through the preparation of the Local Plan. At such time, Local Planning Authorities (LPAs) should consider Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan Period."*

Paragraph 84 continues that *"when drawing up or reviewing Green Belt boundaries, LPAs should take account of the need to promote sustainable patterns of development."*

Paragraph 85 reaffirms the definition of Green Belt Boundaries whereby *"when defining boundaries, LPAs should:*

- *Ensure consistency with the Local Plan Strategy for meeting identified requirements for sustainable development;*

- *Not include land which it is unnecessary to keep permanently open;*

- *Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the Development Plan Period; and*

- *Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.*

Draft NPPF (March 2018):

The Government published its proposed revisions to the NPPF (2012) on 5th March 2018, which propose the following changes to Green Belt Policy of relevance to the site.

Paragraph 135 *"Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or updating of Plans. Strategic Plans should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the Plan Period. Where a need for changes to Green Belt boundaries has been demonstrated through a Strategic Plan, detailed amendments to those boundaries may be made through local Policies, including Neighbourhood Plans."*

Paragraph 136 *"Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic Plan-making Authority should have examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the Examination of the Plan, which will take into account the preceding paragraph, and whether the Strategy:*

*A) Makes as much use as possible of suitable Brownfield sites and underutilised land;*

*B) Optimises the density of development, including whether Policies promote a significant uplift in minimum density standards in town and City Centres, and other locations well served by Public Transport; and*

*C) Has been informed by discussions with neighbouring Authorities about whether they could accommodate some of the identified need for development, as demonstrated through the Statement of Common Ground."*

Paragraph 137 continues "where it has been concluded that it is necessary to release Green Belt land for development, Plans should give first consideration to land which has been previously developed and/or is well-served by Public Transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset thorugh compensatory improvements to the environmental quality and accessibility of remaining Green Belt land."

In summary therefore, the NPPF (2012) and Draft NPPF (2018) supports the longstanding principles of Green Belt protection, whilst acknowledging that the objectives of the Planning System continue to evolve, reflecting current land use pressures and social trends. The Government's priority is to deliver growth and sustainable development through harmonising, wherever and whenever possible, the social, economic and environmental processes that deliver sustainable places. Policy also reinforces the Plan-led system which gives LPAs the power to undertake Green Belt Reviews to help inform Emerging Spatial Strategies for Local Plans necessary in order to meet development needs. The role and function of the Green Belt therefore needs to be considered within this overarching context to assist in the delivery of sustainable development.

Accordingly, as a minimum, the Local Plan should:

i) Identify (allocate) a supply of specific developable sites to meet South Gloucestershire's identified housing needs in full, recognising the site's potential as a suitable and sustainable site to contribute towards identified housing needs; and

ii) South Gloucestershire should consider revising Green Belt boundaries consistent with the Policies of the NPPF in the context of achieving sustainable development (including the aim of significantly boosting the supply of housing) and the exceptional circumstances test, particularly given the highly constrained nature of the Authority, being 61% Green Belt.

**Housing Needs and Sustainability:**

The general approach of the NLP to deliver 1,300 new homes within South Gloucestershire's rural areas, adjacent to urban edges, including a further contingency from non-strategic sites, comprising an additional 500 new homes, is supported in principle.

Furthermore, the identification of Frampton Cotterell as a potential location for further investigation for growth in all three 'options' for non-strategic growth presented within the NLP is supported. The identification of Frampton Cotterell for further investigation highlights the settlements sustainable credentials and the positive contribution that further development at this location can play in meeting South Gloucestershire's identified housing needs.

The site is well served by Public Transport connections with existing bus services located approx. 50m to the South East at the Bristol Road/ Perrinpit Road/Church Road Junction, with regular services to Bristol and Yate.

Frampton Cotterell is well-served by existing community/day-to-day facilities including Primary Schools at Frampton Cotterell Church of England School approx. 600m to the South East of the site, Watermore Primary School at Lower Stone Close approx. 1.5km East of the site, Elm Park Primary School off Nichols Land, Winterbourne and Winterbourne International Academy, High Street, Winterbourne 1.8km South of the site. Furthermore, local convenience shopping is available at the Costcutter/petrol filling station at Bristol Road/Perrinpit Road/Church Road Junction.

Other local facilities within Frampton Cotterell include a bank, butchers, hairdressers, barbers, cafes and Pubs along Church Road and Poplars Farm shop and café on Bristol Road approximately 400m North of the site. Frome Valley Medical Centre and Pharmacy is off Bristol Road approx. 600m to the South of the Junction.

Leisure facilities in vicinity of the site include Frampton Athletics Club, Frampton Cotterell Rugby Club and Frampton Cotterell Cricket Clubs.

There are a variety of employers and businesses within Frampton Cotterell, with further opportunities nearby at Winterbourne, Yate, Emersons Green and Aztec West.

In terms of environmental and heritage constraints, the site is not subject to any statutory or local environmental or heritage designations and is also located within Flood Zone 1 (i.e. lowest Flood Risk) and is therefore considered to be sequentially preferable (subject to release from the Green Belt).

In conclusion, the identification of Frampton Cotterell for further investigation is supported and highlights the settlement's sustainable credentials and the positive contribution that further development at this location can play in meeting South Gloucestershire's identified housing needs. The site is demonstrated to be well-served by Public Transport, is in an area of low Flood Risk and is not subject to environmental or heritage constraints. Accordingly, the site is suitable for residential development with no insurmountable constraints to delivery and is therefore demonstrated to represent a suitable, available and viable development prospect.

**Green Belt Review – Proposed Realignment of the Green Belt at Frampton Cotterell:**

Given the significant development needs identified, the identification of Strategic Development Locations (SDLs) within the Green Belt and the identified need for additional development within the rural areas, it is our view that 'exceptional circumstances' have been demonstrated to warrant the amendment of Green Belt boundaries as part of the South Gloucestershire NLP in line with the provisions of the NPPF (Paragraph 83).

Whilst the site at Frampton Cotterell comprises part Brownfield/part Greenfield land, it is recognised that piecemeal de-designation of the Green Belt at this location is unlikely to contribute towards the delivery of 'sustainable patterns of development' as required by the NPPF.

Accordingly, these Representations put forward a proposed 'strategic' amendment to the Green Belt as shown in **Appendix 2**.

In line with the provisions of Paragraph 85 of the NPPF (2012), the proposed revisions to the Green Belt North of Frampton Cotterell follows "the clearly defined and permanent boundaries" of the River Frome and its tributaries at the East and North Western extents. The land identified for release from the Green Belt seeks to include the more densely built-up areas to the North West of Frampton Cotterell to the West of Bristol Road (including the site at Perrinpit Road) and also recognises the linked opportunity associated with the ongoing promotion of Land East of Bristol Road and North of Frampton Cotterell.

Key to establishing whether this land is suitable for release from the Green Belt (to contribute towards the Council's identified housing needs) is to understand the 'value' of the site in Green Belt terms when assessed against the national purposes of the Green Belt set out in the NPPF.

Assessment Against Green Belt Purpose 1: To Check the Unrestricted Sprawl of Large Built Up Areas:

The original Purpose of the Green Belt at this location was to check the unrestricted growth of Bristol and Bath as the 'large built-up areas' of interest to this assessment. The land identified in **Appendix 2** for release is located well beyond the built-up extent of both Bristol and Bath and therefore does not make a substantial contribution to the wider Green Belt Network at a strategic level. As such, it is considered that the site provides limited or no contribution to the first Green Belt Purpose.

| | |
|---|---|
| | Assessment Against Green Belt Purpose 2: To Prevent Neighbouring Towns From Merging:<br><br>The land identified for release from the Green Belt in **Appendix 2** is located on the North Western edge of Frampton Cotterell and is contained by existing built form associated with the North End neighbourhood (and New Farm/Woodlands Yard) further to the North and residential to the West and South. Moreover, the existing built extent of Frampton Cotterell extends further to the East and accordingly the land identified is not capable of reducing the existing 'gap' between Frampton Cotterell and Yate. It is therefore concluded that the land identified for release from the Green Belt is not capable of acting as a 'gap' or break between two or more definable settlements and is therefore is considered to provide limited or no contribution to the second Green Belt Purpose.<br><br>Assessment Against Green Belt Purpose 3: To Assist in Safeguarding the Countryside From Encroachment:<br><br>The area identified for release from the Green Belt in **Appendix 2** is recognised to be a countryside location on the edge of Frampton Cotterell and accordingly any development at this location will, by necessity, result in encroachment into the countryside. However, similar to 'sprawl' the area benefits from a substantial degree of containment by both the existing settlement pattern to the South, physical features to the East (the River Frome), urban features (the Bristol Road) to the North East and existing built form and a tributary of the River Frome to the West. Accordingly, when considered as a whole, the area proposed for release from the Green Belt is considered to make only a 'partial' contribution to the third Green Belt Purpose.<br><br>Assessment Against Green Belt Purpose 4: To Preserve the Setting and Special Character of Historic Towns:<br><br>This edge of Frampton Cotterell is relatively modern and is not subject to any statutory or heritage designations. Conservation Areas are present at Winterbourne to the South and Iron Acton to the North. However, intervening development exists between the land identified for release from the Green Belt and Winterbourne and the area identified is also contained by the River Frome to the North, with further intervening woodland and open fields and a considerable distance of approximately 1.6km provides a robust landscape setting to Iron Acton's Conservation Area. Accordingly, the area identified in **Appendix 2** is not considered to play a strong role in complementing the setting or special character of nearby historic towns and/or Heritage Assets and therefore plays only a limited contribution to the fourth Green Belt Purpose.<br><br>Assessment Against Green Belt Purpose 5: To Assist in Urban Regeneration, By Encouraging the Recycling of Derelict and Other Urban Land:<br><br>The objective of this Green Belt Purpose is to constrain the supply of development land in order to encourage the recycling of previously developed sites which would not otherwise be developed, and therefore assist in urban regeneration. This objective can only be realised however if there is a supply of derelict and other urban land that is capable of being recycled and which is deliverable. This is demonstrated not to be the case by the identification of the proposed Strategic Development Locations and the need for additional housing sites in the Rural Areas. Accordingly, in the context of an insufficient supply of deliverable Brownfield land to meet housing needs and resulting requirement to identify suitable alternative sites to accommodate growth, it is considered that in practice the significance of the area proposed for release from the Green Belt's contribution towards the fifth Green Belt Purpose is limited. Moreover, the release of this area from the Green Belt would in fact enable the comprehensive redevelopment of the previously developed site and so deliver a greater number of new homes than might otherwise be achievable at this site.<br><br>In summary, the NPPF confirms that the fundamental aim of the Green Belt is to keep land permanently open as a means of achieving its five key Purposes. However, when assessing the area proposed for release in **Appendix 2** against Green Belt Purposes it is shown to only provide a limited contribution to these stated Purposes. Accordingly, the value of this area of Green Belt is therefore considered to be limited and by virtue, any harm arising from its release from the Green Belt is also limited.<br><br>In conclusion, the wider parcel identified in **Appendix 2, which includes my Client's site at Land North of Perrinpit Road**, is therefore considered to be suitable to be taken forward through the NLP process for release from the Green Belt to deliver an appropriate scale of development in a sustainable location in order to contribute towards South Gloucestershire's significant identified development needs.<br><br>*Moreover, the release from the Green Belt and specific development of 'the site' (i.e. Land North of Perrinpit Road), accords with the Government's emerging national Planning Policy contained within the Draft NPPF (March 2018) whereby Local Plans are required to "make as much use as possible of suitable Brownfield sites and underutilised land" (Paragraph 136) and that Local Plans should "give first consideration to land which has been previously developed" (Paragraph 137). Accordingly, the NLP should recognise the site as a suitable Brownfield site capable of contributing positively towards the Council's significant identified development needs.* |
| **Attached documents** | Bristol and England Properties Limited - Pegasus Group (Mr. Jim Tarzey).pdf (882 KB) |

| | |
|---|---|
| **Respondent Name** | Ellen Kenny - Siston Parish Council |
| **Comment ID** | 7853761/2027 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | ***QUESTION 3***<br><br>***3.1 Do you have any Comments on the approach used to determine the 35 rural places we are proposing to investigate for non-strategic growth?***<br><br>***3.4 Do you have any Comments or further information on individual rural places mentioned in this Document?***<br><br>**Recommend**<br><br>***Siston Parish Council places on record its total opposition to any second nearby Green Belt site being identified for any form of built development. The long length of open attractive countryside along the North side of London Road (A420) must continue to offer such views to*** |

| | |
|---|---|
| | ***residents and passersby. The impaired visual impact from any such new build along this section of Green Belt landscape would cause harm and distress to many.***<br><br>**Submitted by Cllr John Hunt in advance of the meeting of Siston Parish Council on Thursday 15th March 2018 providing relevant background information and recommendations for the consideration of those present on that occasion.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Melanie Gregory |
| **Comment ID** | 3895489/2041 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | **Objections for 180 - 200 new homes being built on Castle Farm Road Green Belt Area (behind the Riverside Way Estate)**<br><br>Increased traffic on Abbots Road. This road is already quite dangerous at peak times with its narrow areas and sharp bends. It is certainly not designed to deal with the volume of traffic the additional houses on the proposed site and will make this road far more dangerous to drive and also walk along.<br><br>Direct access to the site. Castle Farm Road is not big enough to deal with an additional 300+ cars (assuming that most houses will be two car occupancy or more). It is very narrow at the end where the Listed houses are situated at the end of the road and the proposed beginning of the new Housing Estate. The pollution from the cars would speed up the decay of the Listed Buildings at the end of this road.<br><br>I note on the proposals that one or two houses may be knocked down on Hencliffe Way to give additional access to the site. Hencliffe Way is not suitable for this as it is a residential street with narrow bends not suitable for the volume of traffic the proposed housing would bring. The photography of Hencliffe Way and Riverside Way shown in the Report by Liz Lake Associates (who was commissioned by the developer wanting to build on this site) is very misleading. Photo Location 10 doesn't show the sharpness of the bend in the road and both Photo Location 10 and 11 are not representative of the roads first thing in the mornings and in the afternoons, evenings and weekends as significantly more of the residents cars are usually parked there, which can make it very hazardous driving if two cars are passing each other. This will be increased if the proposed houses are built.<br><br>I have attached 3 photographs which show alternate views of Photo Location 10. Although many of the houses on Hencilffe Way have parking spaces, the houses are 3, 4 and 5 bedrooms and will have more than two cars associated with the property. With these additional cars and vans parked in the street it makes the actual road much narrower, turning much of the road in to essentially a single track road. This is also the case around the flats at the end of Hencliffe Way and the other main roads in to the Riverside Estate. Further more the Report from the developer seems to suggest that they would encourage people to use Hencliffe Way as the main entrance to the new proposed housing. This would by association, encourage those regularly using the Castle Farm Car Park (for exercise and dog walking etc) to use the Riverside Way as a means to accessing the car park, thus increasing the traffic even more through the Estate, which will effect the safety and wellbeing of the residents of the Estate.<br><br>It is quite a sharp and narrow area to turn out of Riverside Way on to Abbots Road. Often cars leaving the site will have to go on to the other side of the road to get out of the Estate, which is quite dangerous now. This will increase with the additional cars the development could bring.<br><br>The proposed development and additional traffic which will inevitably result in the increased accidents resulting in deaths or hospitalisation of local pedestrian children and elderly.<br><br>The Report doesn't cover what will be put in place for already over stretched and underfunded services such as the Doctors and local Schools. This proposed development will bring 800+ new people to the area who will want to access these services (not to mention the other proposed developments that will bring in many others to the area).<br><br>Open green spaces are important for our physical and Mental Health. This site is regularly used by locals for exercising, whether walking for fitness or walking their dogs. This site is a good area to do this and is a safe place to do so. Once this site has been built on it can't be replaced.<br><br>The proposed construction of 180 to 200 houses on the Castle Farm Road site is on designated Green Belt Land. According to your own South Gloucestershire Green Belt Review 2006 - 2011 Report, the Report notes that this land is 'small but prominent with distinctive character which brings open countryside right up to the urban edge' and 'despite its small size this area of Green Belt is effective at containing urban sprawl and preventing coalescence.' Once this area has been built on we will never get it back.<br><br>The site is important to nature and wildlife preservation. The area is alive with wildlife and building on this site will destroy the habitats of many species of birds and animals native to the UK. The list of different types of precious wildlife in the area is immense, from butterflies, slow worms, Hazel Dormice, Great Crested Newts and a variety of birds including Skylarks who all either currently reside in the proposed site or feed from it. Furthermore a variety of Bats roost in the area including the declining Lesser Horseshoe Bat that roosts in the woods below. Urbanisation in particular has major impact on bat activity and being nocturnal bats are likely to be affected by light pollution which an additional 200 homes and street lighting would bring. According to the Bat Conservation Trust the Lesser Horseshoe Bat is in marked decline and are particularly sensitive to disturbances, which would be the case if this site is built on and the continued habitation in the houses afterward as people go about their everyday lives. |
| **Attached documents** | Hencliffe Way 1.pdf (1.1 MB)<br>Hencliffe Way 2.pdf (522 KB)<br>Hencliffe Way 3.pdf (1.2 MB) |

| | |
|---|---|
| **Respondent Name** | Sue Radford-Hancock - Acton Turville Parish Council |
| **Comment ID** | 1060353/2092 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | We are aware that, under the current plans for development within South Glos, the area around our village is not directly affected by any proposals, but that when the 'Call For Sites' was made in 2015 Badminton Estate took the opportunity to highlight six areas surrounding our village as being suitable for mixed development.<br><br>At the time this caused some concerns within the village, but recently the Estate has approached the Parish Council with a view to discussing initial thoughts about possible development. These first discussions have been warmly received by the Parish Council and the Estate appears to be taking a very sympathetic approach towards the existing populace. The result of an informal, anonymous Survey conducted by the P.C. last year was that, overall, few residents objected to relatively small scale and sympathetic development. This Survey is being used to guide the P.C. in representing the residents.<br><br>We have concerns about numbers of potential new properties and the pressure this would put upon our village School, the local roads (some very narrow and often dangerous), the poor state of local Public Transport and local Medical Facilities. Therefore, whilst there is currently no direct opposition to the idea of development a lot of discussion will be needed to formulate a Strategy to ensure a cohesive approach which will enable the village to participate in the Local Plan in an informal way. The overall number of properties resulting from development within Acton Turville whilst small in number will also assist with the overall provision of additional accommodation within South Gloucestershire Council. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alex Atkinson - Edward Ware Homes (Land East of the A4174, Shortwood) |
| **Comment ID** | 19323937/2101 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Edward Ware Homes (Mr. Alex Atkinson) - Pegasus Group (Mr. Daniel Weaver).pdf (2.6 MB) |

| | |
|---|---|
| **Respondent Name** | Alex Atkinson - Edward Ware Homes (Land at Woodhouse Down, Almondsbury) |
| **Comment ID** | 20248001/2122 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Edward Ware Homes (Mr. Alex Atkinson) - Pegasus Group (Mr. Daniel Weaver).pdf (14.4 MB) |

| | |
|---|---|
| **Respondent Name** | Rebecca Magee |
| **Comment ID** | 19843841/2130 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Please see the attached Document. |
| **Attached documents** | Rebecca Magee.pdf (131 KB) |

| | |
|---|---|
| **Respondent Name** | Paul Davis - Persimmon Homes Severn Valley |
| **Comment ID** | 3553569/2141 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Question 3 – Non-Strategic Growth:<br><br>7.35 As set out above we consider land East of Chipping Sodbury provides the opportunity for a sustainable strategic urban extension either as a specific allocation or as a contingency site. However, its sustainability credentials mean it could equally provide for non-strategic development particularly as it is suitable, available and deliverable.<br><br>7.36 PHSV support the need to identify locations for non-strategic growth and the role it can play in meeting the home ownership needs of first-time buyers, families and the elderly, supporting employment and local services and education facilities.<br><br>7.37 The Plan sets out three options for meeting strategic growth and for the same reasons set out in Paragraphs 7.3 to 7.19 above, we support Option 1 – Locations outside the Green Belt.<br><br>7.38 We note the emphasis on non-strategic growth in meeting needs in the rural area. However, we agree that non-strategic growth should be proportional and dependent on the size of the settlement, its capacity to deliver and the current level of sustainable access to key services and we agree that this level of sustainability assessment should form the basis to prioritise the non-strategic growth locations. We support the Council's threshold for non-strategic growth of development up to 500 dwellings and on this basis, if Chipping Sodbury is not to be allocated a Strategic Site, as we suggest, then as it meets all of the above tests, it should be a key area for meeting non-strategic growth. Therefore in those circumstances we support the identification of Chipping Sodbury in Table 1 for the same reasons that we support it as a suitable location for sustainable growth. |

| | |
|---|---|
| | 7.39 In addition, subject to detailed design work, a non-strategic site of 500 dwellings would still deliver a substantial part of the Yate and Chipping Sodbury Flood Alleviation Scheme in providing access to the site.<br><br>7.40 We consider, in the first instance, non-strategic growth should be delivered outside of the Green Belt. In that respect we support the identification of Chipping Sodbury on the Plans illustrating Options 1 and 3 as a potential location for contributing towards meeting the 1,300 non-strategic dwellings required and the 500 contingency. Land East of Chipping Sodbury can help meet either or both of these requirements. In respect of the analysis of the potential impacts of the Option, we agree that access to services by foot and cycle and access to bus routes is a major advantage. In respect of the identified 'uncertain' impacts, the land East of Chipping Sodbury is not affected by any sites of nature conservation or archaeological interests, and where parts of it are in Flood Zones 2 and 3, as set out above, the site also provides a solution to existing flooding issues in Chipping Sodbury.<br><br>7.41 Therefore PHSV consider the information set out in this Response, including the Promotion Document at Appendix 1 and the revised Call for Sites Form identify the land East of Chipping Sodbury as a sustainable location for the identification of a non-strategic growth site as well as a Strategic Site.<br><br>**9. Appendix 3 - Non Strategic Growth:**<br><br>Green Belt and Areas of Outstanding Natural Beauty:<br><br>9.1 PHSV note that this part of the Document states that *'it may be necessary for further detailed Green Belt assessment of places within or adjoining Green Belt. This will assess at a more local level the value and potential impact from development on smaller parcels of Green Belt land within and adjoining rural places.'*<br><br>9.2 We consider that Green Belt is a strategic Policy designation which when reviewed should be done so comprehensively. It is therefore significant that there is a small, but important, change in the Draft NPPF Green Belt Guidance, which now says *'once established Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or updating of Plans. Strategic Plans should establish the need for any changes to Green Belt boundary, having regard to their intended permanence in the long-term, so they can endure beyond the Plan Period'* (our emphasis).<br><br>9.3 On that basis all changes to the Green Belt boundaries should have been progressed through the JSP. |
| **Attached documents** | Persimmon Homes Severn Valley (Mr. Paul Davis).pdf (3.4 MB) |

| | |
|---|---|
| **Respondent Name** | Russell Lyons |
| **Comment ID** | 20291201/2188 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Rackham Planning fully support the inclusion of the village of Winterbourne as a place for investigation for non-strategic rural growth. The Council's February 2018 Sustainable Access Profile for Winterbourne demonstrates that between 2011 and 2017 there has been only a very small increase of 39 in the number of dwellings in Winterbourne (2,504 dwellings in 2011 and 2,543 dwellings in 2017). This is an increase in the total number of dwellings of just 1.5% over a 6-year period. This is not sustainable in socio-economic terms and failure to allocate land for housing in the village could lead to a stagnated or declining population which in turn would put local services and facilities at risk of decline or closure. The 2011 Census demonstrated that Winterbourne had the second lowest amount of working age residents of any Parish in South Gloucestershire and also the third highest number of residents over 65 years of age. This clearly demonstrates there is a need for family housing to boost the working age population. The village has developed over time, as is common for many rural settlements along well-used roads, as a linear village characterised by ribbon development along the Bristol Road (B4058). We note that the Council's Sustainable Access Public Transport Profile for Winterbourne demonstrates that the village's Public Transport options are very good for a rural settlement with buses every 20 - 35 minutes linking the village with nearby Yate and District Centres at Bradley Stoke and Cribbs Causeway with its considerable employment and shopping opportunities. The bus stops are easily accessible on foot from most locations within the village. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Land at Bromley Heath Landowners |
| **Comment ID** | 20293793/2195 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | 21. We have the following Comments on Rural Place No.12 in Option 3: Hambrook. In terms of meeting the two key Planning issues (Para 2.57 of the SGCLP Draft), the land promoted by Alder King on behalf of the landowner group is located wholly within Flood Zone 1 and would contribute effectively to creating sustainable patterns of development.<br><br>22. Plans, a Transport Appraisal, Air Quality Assessment and Noise Assessment are appended to this Submission. A combined Red Line Plan (see Para 26 below) is also submitted.<br><br>23. AK welcomes the inclusion of the urban edge locations for assessment; it is entirely right to do so. The concept of 'non-strategic' is understood as is the Council's preference for distributing growth on a proportional basis and to plan effectively for growth in the rural villages of South Gloucestershire. AK does not necessarily consider it an appropriate Strategy to deliver the 1,800 homes requirement across say three developments of 500 homes each on the urban edge and the remaining 300 to be distributed to the rural villages. That would miss the opportunity that this category of supply presents to meet the needs of many villages over the Plan Period.<br><br>24. However, the opportunity should not be ruled out completely for significant growth in one or two particular areas; it follows that the 'outside urban area' locations are the most appropriate for such consideration. |

25. The LPA will be aware that our Clients' combined site has promoted for growth via Green Belt release through numerous rounds of Development Planning dating back to the Regional Spatial Strategy. Constraints analysis and masterplanning options have been advanced that suggest a development in the order of 200 - 250 homes would be appropriate.

26. The site is promoted on its own merits as a potential development site but is also promoted in conjunction with a separate site located to the West, which is the subject of concurrent promotion by Redrow Homes (Land off Bristol Road, Hambrook). Both sites in combination would be capable of delivering circa 500 no. dwellings, which would potentially qualify as a Strategic Development Location (SDL) and thus fall within the scope of the JSP.

27. The proposed site is located adjacent to the North Fringe of Bristol, to the North of the established and predominantly residential area of Bromley Heath. The site is directly bounded to the North by the M4 Motorway and to the South by the A4174 Ring Road. It is bounded to the West by the River Frome, which is characterised by a steep river valley. To the East, the site tapers down to a narrow area of tree belt between the M4 and the A4174.

28. The site comprises a number of fields which are divided by hedgerows and Bromley Heath Road, which roughly bisects the site. The site is broadly flat with localised topography associated with the river valley and transport infrastructure. The use of the site is agricultural and there are 2 no. existing dwellings located within the confines of the site.

29. Portions of land believed to be owned by South Gloucestershire Council has been considered as part of these Representations. This land is located (1) at the Eastern end of the combined site, which comprises a PV Solar Farm, and (2) along the Northern boundary of the site, adjacent to the M4. It is likely that the PV infrastructure would be retained over the medium term at least but options have been considered nonetheless in the interest of comprehensive Planning.

30. The site is currently accessed via a left-in, left-out arrangement from Bromley Heath Road. A pathway leads from Bromley Heath Road to a bridge over the A4714, connecting the site directly to Bromley Heath to the South. Furthermore, a Public Right of Way crosses part of the Eastern portion of the site, running North to South.

31. A Constraints and Opportunities Plan has been produced, which graphically displays a number of constraints relevant to the site. Further clarification is as follows:

o The site is located within the Green Belt, as per the South Gloucestershire Local Plan Proposals Map;

o The site lies outside the Hambrook Conservation Area located on the Western site of the River Frome. It does not feature any other heritage designations;

o The site does not feature any particular landscape designations;

o The site is not covered by any ecological statutory designations. Notwithstanding, vegetation located along the River Frome boundary is likely to be sensitive and would be retained. The site also offers opportunities to restore existing habitats and to create significant new ecological resources as part of any Open Space Strategy;

o The site is located within Flood Zone 1 – low risk;

o Issues arising due to the proximity of the M4 and the A4174 include noise and air quality. Both issues would be subject to further detailed assessments but the former could likely be addressed through suitable mitigation including a landscaped buffer/fencing which could be provided as an integral part of the overall site development.

32. Development Proposal – The overall area comprising the 'Land at Bromley Heath' site extends to 14ha. A proposed Concept Masterplan has been produce, which demonstrates one possible way in which the site could be developed. This masterplan layout would comprise circa 5.6ha of residential development, which at 30 – 40 dwellings/ha would yield 168 – 224 dwellings. Discounting the area of the PV Solar Farm, the net developable area would reduce to circa 5ha, delivering 150 – 200 dwellings at a similar density

33. Taking a wider look, the adjacent site to the West promoted by Redrow (Land off Bristol Road, Hambrook) could accommodate up to 350 dwellings, which in combination with our Clients' site, would achieve the 500+ unit threshold to quality as a prospective SDL as part of the JSP.

34. Principle – The site is currently situated within the Green Belt but it is our contention that it does not fulfil the five Purposes of the Green Belt as defined at Para 80 of the NPPF. It could thus be readily removed from the Green Belt without detriment as the M4 and River Frome would form defensible boundaries, protecting the rural areas to the North (including the historic Hambrook settlement) and the West respectively from further encroachment. This is supported by the findings of the 'Joint Spatial Plan Green Belt Assessment Stage 2,' which confirms that both Cells 17a and 17b (which both include portions of the promoted site) only make 'Limited Contributions' to the Purposes of the Green Belt.

35. For the sake of clarity, our Client's land lies in the Eastern portion of 17b but our Representation also includes land in 17a. Our Client's land and that adjacent in 17a is actually only separated by Bromley Heath Road and, in our view, is essentially similar in character. Accordingly, it is

| | |
|---|---|
| | queried why 17a and the Eastern part of 17b were not assessed as a single Cell. Land within 17b is actually substantially split by the River Frome, which at this point runs at a level well below that of the surrounding land, such that the two portions of land are essentially severed due to the level change and resulting separation distances. Indeed, notwithstanding the severance by the Ring Road (which is negated in part by a pedestrian crossing bridge), we would argue that our Client's land actually reads more as Bromley Heath, as opposed to Hambrook.<br><br>36. Para 3.44 of the Stage 2 Document states – "Should a review of the Green Belt be carried out in Local Plans these locations, which contribute less well in terms of Green Belt Purposes, may not now have sufficient justification to remain in the Green Belt." Notwithstanding the further assessment required to ensure that the JSP and Local Plan can be brought into compliance with the NPPF, it is our firm view that such a detailed Green Belt review should most definitely be carried out as part of the South Gloucestershire Local Plan Review. As our Clients' site has been assessed as making only a Limited Contribution to the Green Belt, there should be no question about its removal from the Green Belt as part of the current Plan Review process<br><br>37. Landscape/Green Infrastructure - The site benefits from substantial screening vegetation at its boundaries which, coupled with changes in levels, would in effect screen the site from surrounding viewpoints. This could be further enhanced by additional bunding on the North and South boundaries as part of the suggested noise mitigation measures (see below).<br><br>38. The Concept Masterplan layout provided includes potential for a central area of open space (village green arrangement) and a surface water attenuation pond that could be integrated into the open space provision. Allowances have also been made for the retention of the existing PROW crossing the site as well as the provision of a new pedestrian route through the tree belt bounding the site along the River Frome to the West.<br><br>39. Transport Assessment – a detailed assessment has been undertaken to consider the site's location to the existing non-car travel networks and the type of amenities that would be accessible within a reasonable journey of the site. The evidence concludes that the site would provide residents of a future residential development of the site with an opportunity to access an array of local amenities, including jobs, jobs and services, by a range of non-car travel modes.<br><br>40. Deliverability has been considered in the context of ensuring that options exist to create vehicular and non-car access to the site. In this respect, the Report identifies that a technically suitable access to the site can be secured via (1) an upgrade of the Bromley Heath Roundabout or (2) localised access options taken from Bromley Heath Road via the existing access from the A4174.<br><br>41. Non-car access could be secured via the extension of the existing shared surface pedestrian/cycleway through the site and connecting to existing Public Rights of Way to provide onward access to surrounding settlements. There is also potential to re-introduce a MetroBus stop on the North site of the A4174 adjacent to the site boundary, as was originally proposed in the initial MetroBus scheme.<br><br>42. Noise Assessment - A Noise Risk Assessment has been undertaken, which established prevailing noise levels at the site. A noise model has been generated of all identified noise sources in order to determine the likely prevailing noise levels of the development site during both daytime and night-time hours. The proposed development site is predicted to fall into the 'High' and 'Medium' risk categories during daytime and night time hours.<br><br>43. Mitigation methods have been proposed in the form of a bund along the North and South boundaries of the site, as well as building specific measures such as suitable building fabric, Glazing and Ventilation Strategy and good acoustic design principles. These measures would provide effective attenuation to reduce noise emissions from road traffic on nearby roads to the proposed receivers, thus making the site acceptable for residential development.<br><br>44. Air Quality Assessment - An Air Quality Assessment has been undertaken, which has been undertaken given the site's proximity to the M4/ A4174. Despite the site location between two major roads, conditions at the site are likely to be acceptable, as concentrations of Nitrogen Dioxide at the monitoring sites most representative of the proposed development, are below the annual mean objectives. Nevertheless, it will be necessary for consideration to be given to the location of new properties with respect to these roads, to ensure the national air quality objectives are not exceeded and if any "stand-off" zone is required along the Road Corridors.<br><br>45. In terms of impacts on existing receptors, based on the existing road layout, receptor locations and baseline concentrations, any development at the proposed site is unlikely to represent a significant air quality constraint. With the implementation of appropriate mitigation measures, if required, there should be no air quality constraints to the development of the proposed site for residential.<br><br>46. The site is in a highly sustainable location and meets the criteria for sustainable growth in accordance with the NPPF. The site is available and achievable and of a medium size which could make a significant contribution to the housing needs of the area, whilst falling within the 'non-strategic' category. It can be developed in advance of any other larger urban extensions on the edge of Bristol, and while it could be an important part of the intelligent growth of this area, it is not dependent upon it. The provision of Affordable Housing as part of the development will assist the Local Authority in meeting their identified shortfall. |
| **Attached documents** | Land at Bromley Heath Landowners - Alder King Planning Consultants (Mr. Karl Scholz).pdf (13.9 MB) |

| | |
|---|---|
| **Respondent Name** | Spitfire Bespoke Homes Ltd |
| **Comment ID** | 19738689/2201 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | **Proposed Site:**<br><br>**Context:** |

| | |
|---|---|
| | Winterbourne is a village in South Gloucestershire with a population of 6,023 (2011 Census). It is identified as having a range of services and facilities within walking and cycling distance. One dedicated community centre, one Library, one Post Office and one Public House can be accessed sustainably within 800m. Also within 800m there is a Pharmacy and two Dentists. Slightly beyond the 800m walking and cycling distance the Frome Valley Medical Centre is also considered accessible by walking for many residents of Winterbourne (Sustainability Access Profile, 2018).<br><br>There are also a number of retail and food facilities within 1,200m walking and cycling distance, including three comparison retail stores, a Co-operative supermarket and six smaller convenience (food) stores. Additionally, one major employer, Amcor Flexibles, and two safeguarded employment areas can be found within 2,000m walking and cycling distance of the settlement. There are a further thirteen major employers and six safeguarded employment areas within a 5,600m cycling distance for employment access. This includes access to the Almondsbury Business Park and Aztec West Business Park considered accessible via the cycling infrastructure along Beacon Lane and Bradley Stoke Way. The area is served by educational facilities, with 14 Primary Schools within two miles and five Secondary Schools within three miles. Superfast Broadband is available within the settlement. Finally, a number of suitably frequent and timed Public Transport routes connect Winterbourne to designated Town Centres on weekdays and weekends, allowing the local population to access those services and facilities not locally available.<br><br>**Location:**<br><br>The specific site in question is shown on the attached Site Location Plan (Appendix 1). It is situated to the South West of the settlement and to the North of the Railway Line in Winterbourne and measures approximately 6.07ha of Greenfield land. The site is currently accessed from Mill Road. It lies approximately 480m from the High Street and is readily accessible by foot and cycle to the majority of services identified above. There are also several bus stops located along Dragon Road to the East in the immediate vicinity offering frequent services to the nearby larger settlements, such as Bristol. The M4 Motorway is also within reasonably close proximity although alternative transport options to the private car are available. It is considerably closer to Bristol's Fringe and City Centre than all of the strategic allocations currently proposed.<br><br>The site is bound by the tree lined boundary and railway line to the South; a well vegetated boundary with the B4508 Bristol Road to the East and North East, to the North West is a vegetated area and existing residential development which fronts Dragon Road bounds to the site to the East, with Mill Road to the South East. Overall, it is a well contained site.<br><br>The site is entirely contained within Flood Zone 1, lies outside of the AONB and does not have any local or national landscape or ecological designations, although there are several SNCIs in adjacent areas. The site does however lie within the Bath and Bristol Green Belt, the assessment of the site's proposed release from the Green Belt is discussed above.<br><br>There are no Listed Buildings on or in the immediate vicinity of the site and it does not lie within the Church Lane Conservation Area.<br><br>There is currently no Neighbourhood Plan for the area.<br><br>The site lies outside of but adjacent to the existing built up area of the settlement however it is well contained and accessible to a wide range of services and facilities and represents a logical point of expansion for the village. It is within single ownership and has no significant Planning constraints other than its location within the Green Belt. It has however, been identified that this single parcel of land does not interfere with retaining the overall function of the Green Belt in maintaining its openness and preventing the coalescence of settlements, between the North Bristol Fringe and Winterbourne Down in this instance. Therefore it is recommended that the site be proposed for removal from the Green Belt given that its general extent will be maintained as part of the Emerging Local Plan.<br><br>Despite this, as noted above the Council is requesting advice on the most appropriate Strategy for rural growth and one such option includes support for sites both within and outside of the Green Belt to provide the required rural housing numbers therefore even if the site were not to be removed from the Green Belt, its highly accessible location and position outside of the Flood Plain, with the entirety of the site being in Flood Zone 1, makes this site suitable for a non-strategic housing allocation. |
| **Attached documents** | Spitfire Bespoke Homes Ltd - Hunter Page Planning (Guy Wakefield).pdf (5.6 MB) |

| | |
|---|---|
| **Respondent Name** | Strategic Land Partnerships/ Mr. S. Jarrett |
| **Comment ID** | 20312833/2209 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | 22) We have the following Comments on Rural Place No. 16 in Option 3: Oldland. In terms of meeting the two key Planning issues (Para 2.57 of the SGCLP Draft), the land promoted by Strategic Land Partnerships is located wholly within Flood Zone 1 and would contribute effectively to creating sustainable patterns of development.<br><br>23) AK welcomes the inclusion of the urban edge locations for assessment; it is entirely right to do so. The concept of 'non-strategic' is understood as is the Council's preference for distributing growth on a proportional basis and to plan effectively for growth in the rural villages of South Gloucestershire. AK does not consider it an appropriate Strategy to deliver the 1,800 homes requirement across say three developments of 500 homes each on the urban edge and the remaining 300 to be distributed to the rural villages. That would miss the opportunity that this category of supply presents to meet the needs of many villages over the Plan Period.<br><br>24) However, the opportunity should not be ruled out completely for significant growth in one or two particular areas; it follows that the 'outside urban area' locations are the most appropriate for such consideration.<br><br>25) The LPA will be aware that Strategic Land Partnerships has promoted growth via Green Belt release at Oldland Common through numerous rounds of Development Planning dating back to the Regional Spatial Strategy. Constraints analysis and masterplanning options have been advanced that suggest a development in the order of 500 homes would be appropriate. If considered too high for this category of supply (albeit non-strategic does relate to developments of up to 500 homes) then there are options to moderate development and allow future phases to come forward as necessary.<br><br>26) Moreover, Strategic Land Partnerships is willing to consider a mix of uses for the site including community and employment proposals. AK acknowledges that there is a lack of community centre facilities in the local area and there is clear scope to address this through planned development. The scope to cater for suitable employment uses also exists and we are willing to discuss all possible options for the development of |

| | |
|---|---|
| | the land with the LPA. The Consultation Document is notably lacking on employment land growth and it is assumed will form part of future rounds of Consultation; the land at Oldland Common is readily placed to be included 'within the conversation.'<br><br>27) The site as identified in the Call for Sites Submission is located on the South Eastern built up edge of Bristol and is located approximately 9km from the City Centre. Access to the site is gained from the A4175 which links the A420 with the A431 via Oldland Common. As the Sustainable Access Profile acknowledges there is good access to alternative means of travel such as the cycle and bus network with a range of bus services and the Bristol/Bath Cycle Path within a five minute walk of the site. Connections to local and national rail services can be found at Keynsham Railway Station which lies approximately 3km from the site.<br><br>28) St. Anne's C. of E. Primary School is located approximately 150 metres to the West of the site, on School Road. The local Secondary School, The Sir Bernard Lovell School, is located within 800 metres walking distance to the North of the site. Oldland Common local centre is located approximately 300 metres North of the site and provides a range of local shops and services.<br><br>29) Topography is a particularly limiting factor too in the consideration of options for urban expansion on the Eastern periphery of the urban area. However, the site lies at the foot and on the lowest slopes of the Oldland Ridge. It is influenced substantially by the intrusion of the existing urban edge and has a semi rural character. If development is limited to below the 50 and 55 m. contour (which would include the majority of the site) this would ensure that development could:<br><br>o Relate well to this edge;<br><br>o Be almost entirely obscured by existing development in views from elevated locations to the West;<br><br>o Retain the function of the ridge and its upper slopes which provide important separation between the city and open countryside beyond, and containment when viewed from that countryside and the Cotswold escarpment/AONB;<br><br>o Avoid any perception of encroachment or unconstrained growth ('sprawl'), due to containment;<br><br>o Retain the green backdrop that the slopes and ridge provide in this locality.<br><br>30) The site is in a highly sustainable location and meets the criteria for sustainable growth in accordance with the NPPF. There are no constraints to deliverability of this site, it is both available and achievable and in single ownership and of a medium size which can make a significant contribution to the housing needs of the local area, whilst falling within the 'non-strategic' category. It can be developed in advance of any other larger urban extensions on the edge of Bristol, and while it could be an important part of the intelligent growth of this area, it is not dependent upon it.<br><br>31) It has been demonstrated that the site can successfully integrate with the existing urban area. Two access points are proposed off the A4175 and are designed in accordance with best practice. Development of the site would provide the opportunity to improve the bus services and integration with other local centres. The provision of Affordable Housing as part of the development will assist the Local Authority in meeting their identified shortfall.<br><br>32) A detailed ecological assessment of the site and surroundings have been undertaken and the findings of the Surveys demonstrate that there are no particular features of ecological values associated with the pastures and but the surrounding hedges are old and show good species diversity. However, it is concluded that no protected or endangered species would be deleteriously affected by development. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ashfield Land |
| **Comment ID** | 16658689/2269 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | 1.0 **INTRODUCTION:**<br><br>1.1 On behalf of Ashfield Land, Grass Roots Planning have been instructed to prepare and submit Representations to South Gloucestershire Council's New Local Plan Consultation which is currently taking place until 30th April 2018, in relation to Land West of Castle Farm Road, Hanham (the site).<br><br>1.2 The new Local Plan seeks to replicate the Emerging Spatial Strategy set out in the West of England Joint Spatial Plan (JSP) which was recently submitted for Examination in early April 2018. Whilst the JSP sets the strategic housing and employment requirements for development and allocates Strategic Development Locations (SDLs), the Local Plan needs to provide for the remaining requirements for both housing and employment land. This should include allocating smaller-scale development sites to ensure that a wide portfolio of land is provided to meet commercial and housing land needs, as well as to plan for smaller-scale infrastructure that will support such development.<br><br>1.3 The final version of the NLP will therefore provide a vision for the South Gloucestershire area up to 2036; provide Policies to set out the distribution of retail, homes and employment land; detailed site allocations; Development Management Policies; and an up-to-date Policies Map.<br><br>1.4 At this stage the Plan is consulting upon the potential to maximise urban living, the Strategic Development Locations contained in the JSP, and looks at areas for further investigation for non-strategic growth and small-scale development. The current Consultation stage also includes a Call for Sites to submit details of all available land within the Authority Area.<br><br>1.5 Our Representations focus on the process behind the Local Plan, housing requirements and land supply, and promotes Land West of Castle Farm Road, Hanham (the boundaries of which are identified in Appendix A to this statement), for allocation in the new Local Plan.<br><br>1.6 The settlement of Hanham has been identified as an area with potential for 'maximising urban living' (part of the 'East Fringe Urban Centre'), |

as well as an area for investigation for non-strategic growth outside of the existing urban area, to deliver the residual housing targets that are currently emerging from the JSP and the NLP.

1.7 We strongly support Hanham as a location for non-strategic growth given its close proximity to the main urban areas of Bristol, Bath and Keynsham. It offers easy access to employment areas, retail facilities and educational services as well as good Public Transport links. We suggest that in order to provide for sustainable and well-located non-strategic housing growth, Land West of Castle Farm Road should be removed from the Green Belt and allocated for development to come forward as soon as possible, to begin delivering housing.

1.8 Ashfield Land have a commercial interest in this land and would like to put forward a Planning Application for residential development for approximately 180 dwellings as soon as practically possible; however, they appreciate that as the land lies within the Green Belt the site should be removed from this designation through the Local Plan process first, before any Application is determined.

1.9 Subject to Planning Permission being forthcoming, a development of 180 dwellings could easily begin within the five-year period and deliver completed units within this timeframe. Therefore, we consider that the site could contribute to five-year housing land supply and continue to deliver beyond this time period.

1.10 We will now set out our Representations to the new Local Plan (NLP) in relation to the key subject areas and specifically in respect to our promotion of Land West of Castle Farm Road, and the significant benefits associated with it.

2.0 **DEVELOPMENT PLAN CONTEXT:**

**South Gloucestershire Core Strategy (Adopted 2013):**

2.1 The Core Strategy currently sets out the Spatial Planning Policies for the SGC area over the 2006 – 2027 period; it is anticipated that the Emerging JSP and NLP will replace this. However, the Core Strategy's preparation and Spatial Strategy are still of some relevance to the consideration of the NLP.

2.2 When examining the SGC Core Strategy, the Planning Inspector, Paul Crysell, raised concerns regarding the housing requirements being planned for. In particular, a lack of a NPPF compliant SHMA led to concerns in respect to whether the Plan was adequately considering the needs of the Wider Housing Market Area, including the relatively landlocked City of Bristol. Further information in respect to how joint working between the West of England Authorities would distribute housing between them at a regional level was also requested.

2.3 Due to these concerns, the Inspector asked SGC to commit to an early review of the Plan to review these issues further. After SGC committed to undertaking this, it was agreed that the Core Strategy could be adopted to form an interim basis for Plan-making at that time. The final adopted version of the Core Strategy required the Council to bring forward the review by 2018.

2.4 The Inspector also made reference to the likely need to undertake a further assessment of the Green Belt in SGC as part of the review, in order to address any deficiencies in meeting housing targets and to assist in maintaining an adequate on-going supply of housing land (see Paragraph 51 of his Report).

2.5 It is also salient to note that the Inspector raised concerns that while he acknowledged SGC's desire to protect parts of the District vulnerable to change, such as the Green Belt, there was a duty to meet Objectively Assessed Needs. The Inspector stated the following:

*'Failing to do so could have significant social, economic and environmental consequences, acting as a brake to economy recovery and growth. In terms of housing, under provision could displace demand to other locations and encourage higher levels of commuting.'*

[Paragraph 70]

2.6 As we will go on to explain it is our position that the Spatial Strategy currently being pursued in SGC, as part of the new Local Plan and being driven by the JSP, is doing exactly that, which has significant soundness implications. This is because the national Planning Policy Agenda set out in the NPPF and NPPG, which follows from the requirements of the Climate Change Act, seeks to avoid a distribution of development that increases Green House Gas emissions.

**The West of England Joint Spatial Strategy:**

2.7 The JSP will set the overarching strategic Planning Policy direction for the West of England region for the 2016 – 2036 period.

2.8 South Gloucestershire Council accepts that the new Local Plan (NLP) will need to follow the JSP in terms of the number of houses the Authority plans for. However, there is a significant flaw in this approach which arises from Central Government's proposal to introduce a standardised Methodology to calculating housing requirements.

2.9 This Methodology was set out in 'Planning for the Right Homes in the Right Places: Consultation Proposals' (September 2017) and gives a clear indication of the direction of travel on this subject. This has recently been further reinforced in the published changes to the NPPF issued in March 2018 where Paragraph 60 of the revised Document states:

*'In determining the minimum number of homes needed, Strategic Plans should be based upon a Local Housing Need Assessment, conducted using the standard method in National Planning Guidance – unless there are exceptional circumstances that justify an alternative approach which also reflects current and future demographic trends and market signals. In establishing this figure, any needs that cannot be met within neighbouring areas should also be taken into account.'*

2.10 We are not aware of the existence of any exceptional circumstances that would warrant a departure from the use of this new Methodology in respect to SGC. It is also relevant to note that both of these requirements are simply reinforcing an already existing requirement for Authorities to take into account market signals (Paragraph 17(3)) and account for need that cannot be met within neighbouring Authorities (Paragraphs 178 – 181). In respect to SGC, this is particularly relevant because of the land-locked nature of Bristol City and the demand for housing which emanates from this area. The next section of these Representations will outline the implications of the standardised Methodology on the exact housing requirements that need to be planned for in SGC.

2.11 When considering this issue, it is important to note that these calculations are also accompanied by transitional arrangements describing how they will be gradually implemented. These transitional arrangements are likely to allow the JSP to be assessed against the existing NPPF's requirements, thereby, in the opinion of some Councils, potentially avoiding the need to assess the implications of the standardised Methodology on housing requirements now.

2.12 However, in our view, such an approach is short-sighted and unsound because the Plan has not been positively prepared; nor will it be fully effective once the new standardised figures are implemented. The Plan will not be deliverable over its entire period and will not be based on effective joint working due to the implications of the standardised Methodology which will require a response to the significant uplift proposed for Bristol City and the lower uplifts that apply to both North Somerset Council (NSC) and SGC. Furthermore, this Methodology is a clear interpretation of market signals which the existing version of the NPPF requires to be taken into account when formulating Development Plans, as set out in Core Principle 3 (Para 17(3)).

2.13 We have already objected to the JSP on the basis that market signals are not properly accounted for in the overall housing requirements. In our opinion, while progress can be made on its preparation, the new Local Plan should not be submitted for Examination until the JSP has been scrutinised and the housing requirements that each Local Plan needs to accommodate clearly established. As such, the new Local Plan may fall outside of the transitional arrangements in any event and it therefore needs to plan proactively now, to accommodate any uplift associated with the application of the standardised Methodology.

4.24 In this context our specific concerns in respect to some of the potential locations being pursued by the Council include the following.

***Bridgeyate:***

4.25 This settlement lies within close proximity to the existing urban edge of Bristol and in many ways forms part of the existing urban edge.

4.26 In the wider context of more rural areas of SGC the facilities that the Sustainable Access Profile identifies might be considered to be acceptable to facilitate allocating land for residential development. However, given that more accessible locations lie on the existing urban fringe that provide sustainable access to a much wider range of everyday facilities, such as Hanham, we question why further consideration is being given to this location.

4.27 Additionally, and of greater concern, is the impact on the Green Belt that development at Bridgeyate would have. There is already sporadic ribbon development along the A420 which leads to a perception of urbanisation that undermines one of the key functions of the Green Belt, preventing coalescence between settlements. Providing further urban development in the existing gap between Bristol and Wick to the East will further undermine this function to the detriment of the Bristol and Bath Green Belt.

4.28 In light of these considerations we advocate that Bridgeyate should be discounted from any further assessments in respect to allocating NSDL here.

***Cold Ashton:***

4.29 The Sustainability Profile for this small hamlet correctly identifies that it lacks a range of basic facilities but balanced against this it cites the presence of a community hall and a small convenience store in a nearby petrol filling station in Pennsylvania alongside bus links to Kingswood as ways by which people could access key everyday facilities.

4.30 We object strongly to this location being considered to accommodate housing growth.

4.31 The settlement is very small (just 35 dwellings) and located within the Green Belt. Whilst we consider that the release of Green Belt land is essential to allow SGC to fulfil its development requirements, land should only be considered for release if it offers a range of key services and employment opportunities within walking distance to accord with Paragraph 38 of the NPPF, thereby warranting exceptional circumstances linked to the land's ability to deliver sustainable development that minimises the need to travel by car.

4.32 The available convenience store cited is also very small and lies circa 1,200m from Cold Ashton itself with the walking route travelling along the A46, which is a fast and busy arterial route between Bath and the M4 Motorway. This route (with a narrow and unlit pavement on one side only) is not attractive and many pedestrians would feel unsafe using it. Therefore, we do not consider that the presence of a petrol station assists in making this settlement a sustainable location for housing development and should not be further investigated for potential development.

***Hortham Village:***

4.33 Hortham Village does not have any key facilities located within the ideal walking distance of 800m that the Manual for Streets refers to. Furthermore, the convenience store is again within a petrol filling station and, while within 1,200m walking distance, the route to this is also along a busy road which will deter many potential users.

4.34 Whilst we note that there are other facilities and employment opportunities within the generally accepted maximum walking distance of 2km, and that in a more rural context this would be justification to consider the location for allocation, in this area adjacent to the Bristol Fringe there are better options available that would place new residents within closer proximity to a wider range of key facilities and employment opportunities.

***Horton:***

4.35 This settlement is very small and isolated from larger population centres and employment opportunities. It also lies within the AONB which in our view should be offered a greater degree of protection than the Green Belt because this designation stems from the landscape quality of the area.

4.36 The Council's own Sustainable Access Profile succinctly summarises the issues that apply to allocating development here:

*'Horton has very limited walking and cycling access to most types of key service and facility. Along with a lack of Superfast Broadband provision, there are no health facilities, Post Office, Public House, Library retail and food facilities or sustainable access to major employers.'*

4.37 Apart from a community hall there are no services of any note here and therefore the settlement should be swiftly discounted as a location to accommodate housing growth in the NLP.

***Rudgeway:***

4.38 Again, this very small settlement offers few facilities with only a Public House being identified as accessible to the centre of the hamlet. No employment areas of any note lie within reasonable walking or cycling distance of the site.

4.39 Land here would also need releasing from the Green Belt and given its sub-optimal accessibility we would suggest that its release from this designation would be unjustified.

4.40 Given the alternatives available we would recommend that SGC discount the use of land in this location for housing.

***Old Down:***

4.41 Old Down is a very small settlement of 79 households. The Sustainable Access Profile identifies it as having minimal sustainable access to key services and facilities with only a Public House identified within an 800-metre walking and cycling distance.

4.42 Furthermore, it is acknowledged as lacking walking and community access to community facilities, Post Office and any health facilities within 800 metres. There are no retail/food buying /Town Centre facilities within 1.2km and no employment facilities within 2km. Public Transport links are considered to just meet the minimum criteria for frequency and timing.

4.43 Old Down is also located within the Green Belt and would therefore require release from it which could not be justified on the basis of the lack of facilities identified.

4.44 Given the alternative sites that are available in closer proximity to a number of key services and facilities, and also in the Green Belt, we would recommend that Old Down is discounted.

***Tockington:***

4.45 Whilst Tockington is identified as being within walking distance of a community centre and Public House, with two convenience stores within 1.2km, it is acknowledged that it lacks health facilities and has no access to major employers, safeguarded employment areas, large food buying or Town Centre facilities.

4.46 The proximity of other alternative sites in the Green Belt that provide better access to employment opportunities and facilities means this location should be discounted as an option for a NSDL.

***Old Sodbury:***

4.47 The Sustainable Access Appraisal for Old Sodbury does not identity the relevant constraints to the delivery of development in this location. The topography of the land in Old Sodbury is challenging for development and the settlement itself is located within an Area of Outstanding Natural Beauty(AONB). Further the Southern part of the settlement is located within the Green Belt.

4.48 Coupled with the fact that only a Public House is located within 800 metres of the settlement and a basic convenience store within 1.2km, we would contend that this is not a suitable location for the delivery of non-strategic development and should therefore be discounted.

***Cromhall (Bibstone & Townwell):***

4.49 Cromhall is also a very small rural settlement identified as lacking a number of key services and facilities within walking and cycling distance. Any non-strategic housing growth in this location could only be small scale and would not provide a sustainable location for development that would minimise the need to travel by car.

4.50 On the basis that there are more accessible locations identified that provide sustainable access to a wider range of key services and facilities, we do not consider that any further investigation should be given to this location.

***Falfield:***

4.51 Falfield is acknowledged as having only 86 households with relatively limited walking and cycling access to key services and facilities.

4.52 Planning Permission was granted in December 2017 for a scheme providing up to 85 dwellings in Falfield with associated access, parking, landscape work and public open space (Application Reference: PT17/4800/O). The site is located to the North of the village and would double its existing size.

4.53 The village could not accommodate additional development if these proposals are implemented due to the lack of existing facilities and should therefore be discounted from warranting further investigation.

***3.4 Do you have any Comments or further information on individual rural places mentioned in this Document?***

| | |
|---|---|
| | 8.27 We have no Comment to make on this Question in respect to these Representations. |
| **Attached documents** | Ashfield Land - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (30.0 MB) |

| | |
|---|---|
| **Respondent Name** | H2 Development Management (Land at Williams Close, Longwell Green) |
| **Comment ID** | 20376737/2303 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Please see the attached Document. |
| **Attached documents** | H2 Development Management - Tetlow King Planning (Sean Lewis).pdf (5.3 MB) |

| | |
|---|---|
| **Respondent Name** | Fortannia Ltd |
| **Comment ID** | 19741217/2325 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | ***3.4 Do you have any Comments or further information on individual rural places mentioned in this Document?***<br><br>Please see Call for Sites Submission – Land at Vattingstone Lane, Alveston. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Redrow Homes South West, Julia Wallington, Debra Turner, Andrew Williams, Chr... |
| **Comment ID** | 20167105/2346 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | 8.26 We have no Comment to make on this Question in respect to these Representations. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kate Taylor |
| **Comment ID** | 20664801/2394 |
| **Document Part Name** | Question 03.4 Do you have any comments or further information on individual rural places mentioned in this document? |
| **Comment** | Dear Members of South Gloucestershire Council,<br><br>I am simply writing to say that land which had been set aside for employment is likely to be built on.<br><br>I personally feel that we have had quite enough new housing in the area recently.  And in the light of all the concern about air pollution, and Climate Change, building more housing that people will most likely travel from by car, just seems like wanton destructiveness.<br><br>Thanks for your time. |
| **Attached documents** | MS. Kate Taylor.pdf (577 KB) |

| | |
|---|---|
| **Respondent Name** | Peter Rawlinson - Gleeson Strategic Land Limited |
| **Comment ID** | 19328353/453 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | Gleeson has submitted additional information on its site at Marshfield under the separated Call for Sites Form. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alveston, Rudgeway, and Earthcott Parish Council |
| **Comment ID** | 19784545/454 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | **No** |

| | |
|---|---|
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alan Jones - Hanham District Green Belt Conservation Society |
| **Comment ID** | 17236353/506 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | 3.5 Call for Sites:<br><br>The process is flawed as the only contributors are those with vested interest in developing their land/site for profit.<br><br>Only once the realistic level and mix of housing need has been established and demonstrated, can Plans be considered as the sustainable locations where the accommodation is required - it's certainly not away from shops and bus routes, in isolated, disconnected communities!! |
| **Attached documents** | Hanham District Green Belt Conservation Society (Alan Jones).pdf (20.3 MB) |

| | |
|---|---|
| **Respondent Name** | Mark Williams |
| **Comment ID** | 19729473/723 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | A separate Call for Sites Form is submitted in parallel with this Representation.<br><br>We look forward to further discussing this location with the Council in the coming Months. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Chelverton Developments Ltd |
| **Comment ID** | 16478625/735 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | (3.5) Chelverton is promoting the development of land straddling the Yate/Chipping Sodbury Ward Boundary (Site Ref: SG65: Land at Barnhill, Sodbury) where there is scope to provide up to 200 new houses at a highly-accessible and unconstrained urban edge location. Development at this site, on the Northern edge of the town, would promote a healthy distribution of new housing within the Yate/Chipping Sodbury area when considered with existing major housing commitments (North Yate Neighbourhood), the proposed Yate SDL on the Western side of the urban area, and the SDL contingency site to the South. Furthermore, the constrained nature of land on the Eastern side of Chipping Sodbury limits opportunities for sustainable housing development. Taking these matters into consideration, the Barnhill site represents a logical location for non-strategic housing development. Chelverton's Call for Sites Submission evidences the availability and suitability of this site for housing. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | James Carpenter - Falfield Parish Council |
| **Comment ID** | 16617825/743 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | We cannot suggest land/buildings for strategic growth. However we are concerned that there is too little reference to limiting the footprint of the SDL and NSDL sites which do get put forward. As a rural Parish we do not want to see these sites subsequently sprawling into adjoining agricultural fields and we want to see a robust Strategy written into the Local Plan Policies which prevents landowners and developers from continually trying to develop nearby agricultural land in an ad hoc manner by piggy backing off the edges of the sites selected. The Responses to previous 'Call for Sites' requests does indicate that there is a high chance that this may happen, so robust Planning Controls are required from the outset. |
| **Attached documents** | Falfield Parish Council (Mr. James Carpenter).pdf (1.9 MB) |

| | |
|---|---|
| **Respondent Name** | Sovereign Housing Association |
| **Comment ID** | 16477825/778 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | A separate Call for Sites Form is submitted in parallel with this Representation.<br><br>We look forward to further discussing this location with the Council in the coming months. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Robin Pearce - Ivywell Capital Ltd |
| **Comment ID** | 19998625/964 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | 27) A Call for Sites Form together with Title information and a redline Site Plan has been submitted alongside this Representation. This information demonstrates this site is appropriate for allocation and is developable and deliverable in the next 5 years. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David Moodie |
| **Comment ID** | 19732737/982 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | Please see supporting Representations Document and Call for Sites Submission. |
| **Attached documents** | Mr. David Moodie - Fisher German LLP (Ms. Angela Smedley).pdf (578 KB) |

| | |
|---|---|
| **Respondent Name** | Cate Davidson - Sodbury Town Council |
| **Comment ID** | 4877793/1010 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | Dear Planning Team,<br><br>Sodbury Town Council responds as follows to the Local Plan (non strategic) Consultation:<br><br>Q. 3:<br><br>3.5 N/A.<br><br>Please note the Comments as appropriate. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hannah Spanton - Badminton Estate |
| **Comment ID** | 19884225/1032 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | Call for Sites Forms enclosed in relation to Acton Turville and Tormarton. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Robin Pearce - Bristol & England Properties |
| **Comment ID** | 19884417/1076 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | 28) A Call for Sites Form together with title information and a redline Site Plan has been submitted alongside transport information and these Representations. This information demonstrates this site is appropriate for allocation and is developable and deliverable in the next 5 years. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Clifton Homes Ltd |
| **Comment ID** | 16617921/1085 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | **Please see submitted Representations.** |
| **Attached documents** | Clifton Homes Ltd - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (1.7 MB) |

| | |
|---|---|
| **Respondent Name** | South West Strategic Development and Ian and David Knipe |
| **Comment ID** | 19884577/1109 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | Please see submitted Representations. |
| **Attached documents** | SW Strategic Development and I. and D. Knipe - Grass Roots.pdf (27.4 MB) |

| | |
|---|---|
| **Respondent Name** | Progold Ltd |
| **Comment ID** | 19737665/1123 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | Please see submitted Representations. |
| **Attached documents** | Progold Ltd - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (7.9 MB) |

| | |
|---|---|
| **Respondent Name** | Cath Purchase |
| **Comment ID** | 19839777/1185 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | It is important to explore opportunities for Brownfield development, for example the area opposite The Green in Tockington which is a former coach park and has been disused for many years.<br><br>A suggestion for alternative housing development is the area between Aust and Pilning either side of the Dual Carriageway where there are open spaces outside the Green Belt with excellent links to Bristol, the Motorway and Wales. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Messrs Keller, Grace, Moorlen and Barnes |
| **Comment ID** | 19889409/1240 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | Part 1 (Housing Requirements) and Part 2 (Spatial Strategy) including Questions 1, 2, 3 and Strategic Development Locations:<br><br>Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Messrs Keller, Grace, Moorlen and Barnes - Pegasus Group (Mr. Daniel Weaver).pdf (423 KB) |

| | |
|---|---|
| **Respondent Name** | Reuben Bellamy - Lone Star Land Limited |
| **Comment ID** | 19738529/1247 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | Question 3.5:<br><br>It is noted that my Client's land interests at Hawkesbury Upton are identified at www.southglos.gov.uk/callforsites from the February 2018 Call for Sites undertaken by the Council. However, the Call for Sites Form attached is blank. A completed Form will be submitted under separate cover. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Conor Lee - Hannick Homes |
| **Comment ID** | 11945985/1319 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | 17) A Call for Sites Form together with title information and a redline Site Plan has been submitted together with these Representations. This information demonstrates this site is appropriate for allocation and is developable and deliverable in the next 5 years. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | ATA Estates (Longwell Green) LLP |

| | |
|---|---|
| **Comment ID** | 19740449/1411 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | Please see the enclosed Representations in respect of the Local Plan Consultation Document (February 2018). Please note that separate Representations are being submitted in respect of the Consultation on the 2018 Sustainable Access Methodology and the associated Sustainable Access Profiles. |
| **Attached documents** | A Estates (Longwell Green) LLP - Walsingham Planning (Mr. Daniel Sharp).pdf (59.8 MB) |

| | |
|---|---|
| **Respondent Name** | Reginald Pearce, Judith Davis & Rachael Shiles |
| **Comment ID** | 19740897/1482 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | 28) A Call for Sites Form together with red line Plan identifying the location of the land has been submitted with these Representations. This information demonstrates this site is appropriate for allocation and is developable and deliverable in the next 5 years. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Reginald Pearce |
| **Comment ID** | 19740929/1486 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | 8) A Call for Sites Form together with red line Plan identifying the location of the land has been submitted with these Representations. This information demonstrates this site is appropriate for allocation and is developable and deliverable in the next 5 years. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | The Engine Common Trustees (ECT) |
| **Comment ID** | 19741409/1564 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | With reference to Q. 3.4 above, under the Call for Sites Consultation Site References: SG129, 135,181, 182, 183 and 228 have been put forward for consideration. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | M. S. Howes |
| **Comment ID** | 19741377/1575 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | With reference to Q. 3.4 above, under the Call for Sites Consultation Site References: SG129, 135,181, 182, 183 and 228 have been put forward for consideration. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Rockfield Farms Limited (RFL) |
| **Comment ID** | 20069217/1589 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | With reference to Q. 3.4 above, under the Call for Sites Consultation Site References: SG129, 135,181, 182, 183 and 228 have been put forward for consideration. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Downend Estates Limited (DEL) |
| **Comment ID** | 1463137/1600 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | With reference to Q. 3.4 above, under the Call for Sites Consultation Site References SG129, 135,181, 182, 183 and 228 have been put forward for consideration. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | E. H. Schubert Will Trust |
| **Comment ID** | 12403425/1676 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | Please see the Call for Sites Submission for further details. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | G. E. Forward |
| **Comment ID** | 20176577/1711 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | Call for Sites:<br><br>How it has been conducted is with vested interest and profit orientated not in the interests of the possible residents. Despite raising the Kleeneze Site as a viable option it still is not in the Call for Sites List. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mr. Michael Savory and Mr. Miles Savory |
| **Comment ID** | 19721665/1799 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | Our Client owns approximately 0.94ha of land that abuts the Hambrook Settlement Boundary that we consider is in an excellent location for non-strategic growth in a settlement identified as having development potential in the Local Plan Consultation Document.<br><br>A Site Location Plan is attached to this Response Form and shows the site extends in a rectangular shape West of Old Gloucester Road. An existing vehicular access is situated at the front (Eastern edge) of the site and is accessible off The Stream. The majority of the site is covered in hardstanding and there are numerous buildings on-site, both single and 2/3 storey, which take up a footprint of approximately 2,200 sqm. The site is therefore previously developed (Brownfield) land. There is a strong bund of trees approximately 4 - 8 metres in height on the Southern and Western boundaries of the site however it is understood they are not subject to a Tree Preservation Order.<br><br>To the North of the site lies agricultural land as well as some residential properties, which are accessed off Old Gloucester Road. To the East of the site lies The Stream which runs in an East to West direction from Bristol Road(B4058) which links up to the Ring Road (A4174). The predominant character of The Stream is of semi-rural residential with large detached 2-storey properties lining the street predominantly to the North with some also to the South. To the South East of the site lies several residential properties which front onto Old Gloucester Road. To the South of the site is an agricultural field of approximately 2.5ha. Finally, to the West of the site is the M32 Motorway, which sits beyond a small amount of agricultural land and an access for farm machinery that leads into fields to the West of the Motorway.<br><br>An Extract from the South Gloucestershire Policies Map is shown below and confirms the site's location (marked with a red line) within the Green Belt and adjacent to the Southern Hambrook Settlement Boundary (marked with a black line). It also confirms that the site is within the Hambrook Conservation Area and that the Grade II Listed Hambrook Farm Barn is situated on the site. In addition, the Grade II* Listed Faber's Farmhouse is located to the North East of the site and the Grade II Listed Brook House is located to the East of the site on the other side of Old Gloucester Road. A Heritage Statement would accompany any Planning Application submitted for the site. The site is located within Flood Zone 1, the area least at risk of flooding.<br><br>Please see the attached Document for Figure 1 which is referenced below.<br><br>*Figure 1 – Extract from the South Gloucestershire Council Policies Map*<br><br>The site is on the edge of the Settlement Boundary and is considered to be suitable for a release from the Green Belt given that it would form a logical extension to the settlement. The Southern Hambrook Settlement Boundary already extends in a fairly linear form along The Stream. The inclusion of this site within the Hambrook Settlement Boundary would allow the village to extend in a continuation of its traditional form. It is considered that up to 30 units could be incorporated on the site and there are many existing buildings that could be converted into residential accommodation. It is recognised that the location of the M32 to the West of the site is a constraint in terms of noise pollution, however an area in the Western part of the site could be 'sterilised' so residential development does not occur too close to the Motorway and noise insulation measures can be undertaken including acoustic fencing and triple/quadruple glazing. A Noise Impact Assessment would accompany any Application. We are open to just the Eastern half of the site (which contains the majority of the existing buildings) being allocated for housing, or the entire site. The site is well screened on all sides and therefore any development would have limited visual impact in the public realm.<br><br>There is one existing access point to the site – off The Stream/Old Gloucester Road and this could be used as part of any future residential development. A Transport Assessment would accompany an Application for a major development. The North and South bound bus stops to Emersons Green and Yate respectively are located at the Eastern end of The Stream on Bristol Road approximately 200 metres away; within comfortable walking distance. Both bus stops are served by safe and secure access for pedestrians. Development of this site and its release from the |

| | |
|---|---|
| | Green Belt would not conflict with the purposes of Green Belt land in that the development of this previously developed (Brownfield) site would not have any harmful or adverse impact on:<br><br>1. The unrestricted sprawl of large built up areas – Hambrook is identified as a sustainable rural settlement of just 50 dwellings and is as such not a large built up area;<br><br>2. There will be no impact on towns merging with one another;<br><br>3. Given the site is previously developed land and is well enclosed by mature vegetation, there is no encroachment into the countryside;<br><br>4. There are designated Heritage Assets on and close to the site and therefore a Heritage Assessment (Heritage Statement) would need to be undertaken in order to ensure the setting and special historic character of towns would not be impacted upon; and<br><br>5. The site would assist in urban regeneration, by encouraging the recycling of derelict and other urban land.<br><br>The site meets the two key Planning issues that places for non-strategic growth are assessed against on Page 57 of the Consultation Document, namely: creating sustainable patterns of development; and a sequential approach to Flood Risk.<br><br>A completed Call for Sites Form accompanies this Submission. |
| **Attached documents** | Mr. Michael Savory - Rackham Planning (Mr. Will Collins.pdf (639 KB)<br>Hambrook Site Plan.pdf (159 KB) |

| | |
|---|---|
| **Respondent Name** | Mark Skuse |
| **Comment ID** | 19740097/1837 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | Our Client owns approximately 4.01ha of land that abuts the Alveston Settlement Boundary that we consider is in an excellent location for non-strategic growth in a settlement identified as having development potential in the Local Plan Consultation Document.<br><br>A Site Location Plan is attached to this Response Form and shows the site extends in an irregular shape from the North of the defined Settlement Boundary of Alveston. An existing vehicular access is situated in the far Eastern corner of the site off Alveston Hill and is demarked by a field gate. The last known use of the site has been for agricultural purposes though the field is not actively farmed. There is a strong bund of trees/ hedgerow of varying heights on all boundaries of the site however it is understood that none are subject to a Tree Preservation Order.<br><br>To the north of the site lies a Cemetery, Thornbury Golf Course and two residential properties which are both accessed off Alveston Hill. To the East of the site lies Alveston Hill with a small farming complex with agricultural buildings beyond. To the South of the site lies residential properties that are accessed off Down Road and Alveston Hill. The predominant character of the properties on these roads is of single and two storey detached residential properties. To the West of the site lies the Alveston Settlement Boundary and Costers Close which is accessed off Quarry Road.<br><br>An Extract from the South Gloucestershire Policies Map is shown below and confirms the site's location (marked with a red line) within the Green Belt and adjacent to the Alveston Settlement Boundary (marked with a black line). In terms of Heritage Assets that may affect the site, the Grade II Listed Marlwood Grange is located to the North of the site however it is completely screened from view due to a mature tree bund. The Grade II Listed Ship Inn is located to the South of the site on Alveston Hill, however again this is screened from views to and from the site. The site is located within Flood Zone 1, the area least at risk of flooding.<br><br>Please see the attached Document for Figure 1 which is referenced below.<br><br>*Figure 1 – Extract from the South Gloucestershire Council Policies Map*<br><br>The site is on the edge of the Settlement Boundary and is considered to be suitable for a release from the Green Belt given that it would form a logical extension to the settlement. Alveston already extends in a fairly linear form along the A38 and Alveston Hill. The inclusion of this site within the Alveston Settlement bBundary would allow the village to extend in a continuation of its traditional form along Alveston Hill. The site is well screened and therefore any development would have limited visual impact in the public realm. Any views into the site would view the development against the backdrop of the existing Alveston built-up area to the South and West.<br><br>There are two existing access points to the site – one off Alveston Hill and the other off Costers Close - and both could be explored as part of any future residential development though it is considered an access point off Alveston Hill would be preferable and achievable. In terms of Public Transport and specifically bus links. The North bound bus stop and the South bound bus stop are both located on Alveston Hill opposite Thornbury Cricket Club approximately 350 metres away; within comfortable walking distance of the site. Both bus stops are served by pavements along Alveston Hill and Down Road that ensure safe and secure access for pedestrians. |

| | |
|---|---|
| | Development of this site and its release from the Green Belt would not conflict with the purposes of Green Belt land in that the development of this partially previously developed site would not have any harmful or adverse impact on:<br><br>1. The unrestricted sprawl of large built up areas – Alveston is identified as a sustainable rural settlement of just 985 dwellings and is as such not a large built up area;<br><br>2. There will be no impact on towns merging with one another. The site is visually contained/enclosed and the Thornbury Settlement Boundary lies just over 1km away to the North;<br><br>4. There are no designated or non-designated Heritage Assets close enough to the site that their setting would be impacted upon and therefore the setting and special historic character of towns would not be impacted upon; and<br><br>5. Non-strategic sites in the South Gloucestershire Green Belt need to be brought forward to meet the Authority's housing targets, as set out in the JSP, and so the development of this site would not conflict with the recycling of derelict and other urban land which should also come forward for housing.<br><br>The site meets the two key Planning issues that places for non-strategic growth are assessed against on Page 57 of the Consultation Document, namely: creating sustainable patterns of development; and a sequential approach to Flood Risk.<br><br>A completed Call for Sites Form accompanies this Submission. |
| **Attached documents** | Alveston Site Plan.pdf (356 KB)<br>Mr. Mark Skuse - Rackham Planning (Mr. Will Collins).pdf (685 KB) |

| | |
|---|---|
| **Respondent Name** | Martyn Lewis |
| **Comment ID** | 19721729/1861 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | Our Client owns approximately 0.63ha of land that abuts the Rudgeway Settlement Boundary that we consider is in an excellent location for non-strategic growth in a settlement identified as having development potential in the Local Plan Consultation Document.<br><br>A Site Location Plan is attached to this Response Form and shows the site extends in a rectangular shape from the South West boundary of Minerva by approximately 110 metres. An existing vehicular access is situated midway through the site opposite Rudgeway Park to the South East of Gloucester Road. There is also a significant amount of hardstanding on the site, particularly in the Southern corner, which has been used for domestic storage over the years. The site can therefore be considered as partially previously developed land. There is a strong bund of trees approximately 4 metres in height on the South Eastern boundary of the site however it is understood they are not subject to a Tree Preservation Order.<br><br>To the North East of the site lies the existing two storey residential property Minerva with its associated outbuildings. This is also owned by Mr. Lewis. To the East of the site lies Gloucester Road (the A38) and Rudgeway Park Housing Estate beyond. The predominant character of the East side of the road is of single and two storey residential properties. There are bungalows opposite Minerva however it should be noted these sit on higher land (approx. 3 metres) than the site. To the South West and West of the site lies a former Quarry.<br><br>An Extract from the South Gloucestershire Policies Map is shown below and confirms the site's location (marked with a red line) within the Green Belt and adjacent to the Rudgeway Settlement Boundary (marked with a black line). It also confirms that there are no Heritage Assets (either designated or non-designated) that effect the site. The site is located within Flood Zone 1, the area least at risk of flooding.<br><br>Please see the attached Document for Figure 1 which is referenced below.<br><br>*Figure 1 – Extract from the South Gloucestershire Council Policies Map*<br><br>The site is on the edge of the Settlement Boundary and is considered to be suitable for a release from the Green Belt given that it would form a logical extension to the settlement. Rudgeway already extends in a fairly linear form along Gloucester Road. The inclusion of this site within the Rudgeway Settlement Boundary would allow the village to extend in a continuation of its traditional form. The attached Proposed Block Plan demonstrates that up to 14 units could be developed on the site. The site is well screened and therefore any development would have limited visual impact in the public realm.<br><br>There are two existing access points to the site – both off Gloucester Road and both could be explored as part of any future residential development. The North bound bus stop to Thornbury is located adjacent to the proposed development site and the South bound bus stop to Bristol is located 350 metres away; within comfortable walking distance. Both bus stops are served by pavements that ensure safe and secure access for pedestrians. |

| | |
|---|---|
| | Development of this site and its release from the Green Belt would not conflict with the purposes of Green Belt land in that the development of this partially previously developed site would not have any harmful or adverse impact on:<br><br>1. The unrestricted sprawl of large built up areas – Rudgeway is identified as a sustainable rural settlement of just 99 dwellings and is as such not a large built up area;<br><br>2. There will be no impact on towns merging with one another;<br><br>3. Given the site is partially previously developed land and is well enclosed by mature vegetation, there is no encroachment into the countryside;<br><br>4. There are no designated or non-designated Heritage Assets close to the site (or in Rudgeway at all) and therefore the setting and special historic character of towns would not be impacted upon; and<br><br>5. Non-strategic sites in the South Gloucestershire Green Belt need to be brought forward to meet the Authority's housing targets, as set out in the JSP, and so the development of this site would not conflict with the recycling of derelict and other urban land which should also come forward for housing.<br><br>The site meets the two key Planning issues that places for non-strategic growth are assessed against on Page 57 of the Consultation Document, namely: creating sustainable patterns of development; and a sequential approach to Flood Risk.<br><br>A completed Call for Sites Form accompanies this Submission. |
| **Attached documents** | Mr. Martyn Lewis - Rackham Planning (Mr. Will Collins).pdf (672 KB)<br>Block Plan.pdf (194 KB)<br>Site Location Plan.pdf (161 KB) |

| | |
|---|---|
| **Respondent Name** | Mr. Peter Maggs & Mrs. Jeanne Maggs |
| **Comment ID** | 19721825/1867 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | Our Client owns approximately 2.9 ha of land that abuts the Easter Compton Settlement Boundary that we consider is in an excellent location for non-strategic growth in a settlement identified as having development potential in the Local Plan Consultation Document.<br><br>A Site Location Plan is attached to this Response Form and shows the site, which is triangular in shape, located South of Over Lane and to the East of Blackhorse Hill (B4055). A Link Road which spurs off Over Lane abuts the site to its South Eastern boundary. An existing vehicular access is situated off Over Lane in the North Eastern corner of the site and is marked by a metal field gate. There is another vehicular access point off Blackhorse Hill at a midway point on the South Western boundary of the site, marked by a wooden field gate. The site is currently a vacant field that is used occasionally by a local farmer on an annual grass keep agreement. There is a strong bund of hedgerow and foliage approximately 3 metres in height on the Northern boundary of the site with Over Lane. There is a young hedgerow on the South Western boundary of the site abutting Blackhorse Hill. There are also a small number of trees adjacent to the site, which are located on highway verge. However, it is understood they are not subject to a Tree Preservation Order. The site slopes gently in a South to North direction.<br><br>To the North of the Application site is the village of Easter Compton, which predominantly consists of residential development. The character of the residential development directly to the North of the site is large, detached two-storey houses. The village has a wide variety of residential development overall including semi-detached, terrace, and bungalow homes. The land to the North East is owned by Hydrock Ltd, and used for leisure purposes and entertainment events by their subsidiary, Mojo Active. To the East/South East of the site is The Bristol Golf Club. To the South West and West of the site lies agricultural land and land associated with the Wild Place Project (part of Bristol Zoo). The latter has a large car parking area off the B4055 and many buildings. Directly to the South West of the site on the opposite side of the B4055 there is an area of dense woodland. Beyond this lies land owned by Bristol Zoo with extant Planning Permission for a visitor attraction.<br><br>An extract from the South Gloucestershire Policies Map is shown below at **Figure 1** and confirms the site's location(marked with a red line) within the Green Belt and adjacent to the Easter Compton Settlement Boundary (marked with a black line). It also confirms that there are no Heritage Assets (either designated or non-designated) that effect the site.<br><br>Please see the attached Document for Figure 1 which is referenced below.<br><br>*Figure 1 – Extract from the South Gloucestershire Council Policies Map*<br><br>The site is located within Flood Zone 1, the area least at risk of flooding, as shown in the Extract from the Environment Agency Flood Map for Planning below at **Figure 2**. A key attribute of the site is that it sits in Flood Zone 1 whereas much of Easter Compton (to the North) is situated within Flood Zones 2 and 3. One of the key Planning issues that places for non-strategic growth are assessed against on Page 57 of the Consultation Document is a sequential approach to Flood Risk. New residential development should be directed to Flood Zone 1 in the first instance and the proposed development site is located in this area, whereas much of Easter Compton is not. |

| | |
|---|---|
| | Please see the attached Document for Figure 2 which is referenced below.<br><br>*Figure 2 – Extract from the Environment Agency Flood Map for Planning*<br><br>The site is on the edge of the Settlement Boundary and is considered to be suitable for a release from the Green Belt given that it would form a logical extension to the settlement. Easter Compton already extends in a linear form along the B4055. The inclusion of this site within the Easter Compton Settlement Boundary would allow the village to extend in a continuation of its traditional form.<br><br>There are two existing access points to the site – one off Over Lane and the other off Blackhorse Hill (B4055) and both could be explored as part of any future residential development along with other options, if required. The South bound bus stop to Cribbs Causeway/Bradley Stoke/Filton/ Patchway and North bound bus stop to other service villages are located approximately 400 metres away; a short walk from the proposed development site. Both bus stops are served by pavements – accessible from the North West corner of the site that ensure safe and secure access for pedestrians.<br><br>Development of this site and its release from the Green Belt would not conflict with the purposes of Green Belt land in that the development of this Greenfield site would not have any harmful or adverse impact on:<br><br>1. The unrestricted sprawl of large built up areas – Easter Compton is identified as a sustainable rural settlement of just 230 dwellings and is as such not a large built up area;<br><br>2. There will be no impact on towns merging with one another;<br><br>3. There are no designated or non-designated Heritage Assets close to the site (or in Easter Compton Village at all) and therefore the setting and special historic character of towns would not be impacted upon; and<br><br>4. Non-strategic sites in the South Gloucestershire Green Belt need to be brought forward to meet the Authority's housing targets, as set out in the JSP, and so the development of this site would not conflict with the recycling of derelict and other urban land which should also come forward for housing.<br><br>The site meets the two key Planning issues that places for non-strategic growth are assessed against on Page 57 of the Consultation Document, namely: creating sustainable patterns of development; and a sequential approach to Flood Risk.<br><br>A completed Call for Sites Form accompanies this Submission. |
| **Attached documents** | Mr. Peter Maggs - Rackham Planning (Mr. Will Collins).pdf (655 KB)<br>Site Plan.pdf (195 KB) |

| | |
|---|---|
| **Respondent Name** | Andrew Harvey - Harvey Shopfitters Ltd |
| **Comment ID** | 16665505/1873 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | Our Client owns approximately 0.675 ha of land that abuts the Bristol urban area that we consider is in an excellent location for non-strategic growth in an urban edge area identified as having development potential in the Local Plan Consultation Document.<br><br>A Site Location Plan is attached to this Response Form and shows the site extends in a rectangular shape to the North of Common Road. There is an existing singular point of vehicular access into the site off Common Road with enough space for vehicles on either side of the road to pass each other. Historically, the site is a former Quarry and industrial buildings have existed on site since the early 1980's. The site is formed by an existing large workshop (Image 2) and office building (Image 4) within the site which is the Headquarters of Harvey Shopfitters (a commercial, retail and leisure premises fit out company). There are also approximately five steel storage containers on the site, which have been used for storage for many years.<br><br>The site can therefore be considered as previously developed (Brownfield) land. There is a strong bund of trees approximately 4 metres in height to the Northern, Southern and Eastern boundaries of the site however it is understood they are not subject to a Tree Preservation Order.<br><br>To the North and West of the site lies Hencliffe Wood which is covered by a Tree Preservation Order. All trees that fall within this Order are however located outside of the site's boundary. Immediately abutting the site to the West is the residential property No.19 Common Road, a detached house set in generous garden space. To the East of the site lies Hanham Common and the Bristol urban area. To the South of the site lies the two storey residential properties on Common Road and beyond.<br><br>An Extract from the South Gloucestershire Policies Map is shown below and confirms the site's location (marked with a red line) within the Green Belt and adjacent to the Bristol urban area (marked with a black line). The site is bounded by the urban area on two sides (East and South) and further residential development to the West. The only side on which there is not development is to the North which is the protected Hencliffe Wood. The Extract also confirms that there are no Heritage Assets (either designated or non-designated) that effect the site. The site is located within Flood Zone 1, the area least at risk of flooding. |

| | |
|---|---|
| | Please see the attached Document for Figure 1 which is referenced below.<br><br>*Figure 1 – Extract from the South Gloucestershire Council Policies Map*<br><br>The site is on the edge of the Bristol urban area and is considered to be suitable for a release from the Green Belt given that it would form a logical extension to the urban edge. It can be seen from the above Map that the Settlement Boundary is indented, giving scope for it to be moved further West to include this Brownfield site. The inclusion of this site within the Bristol urban area would not prejudice the '*Green Gap*' that exists between Hanham and Broom Hill/Brislington to the West. The site is well screened and therefore any development would have limited visual impact in the public realm.<br><br>The existing access point to the site – off Common Road - could be used as part of any future residential development. The North bound bus stop to Bristol City Centre is located on Memorial Road 350 metres away; within comfortable walking distance. Buses depart for the Centre regularly, every 20 minutes. The bus stop is served by pavements that ensure safe and secure access for pedestrians.<br><br>Development of this site and its release from the Green Belt would not conflict with the purposes of Green Belt land in that the development of this partially previously developed site would not have any harmful or adverse impact on:<br><br>1. The unrestricted sprawl of large built up areas – allocating this site for residential development would not result in unrestricted sprawl as it is land that has already been developed (Brownfield) and is enclosed by Hencliffe Wood to the North and West which would prevent any further '*unrestricted*' development into the Green Belt;<br><br>2. There will be no impact on towns merging with one another;<br><br>3. Given the site is previously developed land and is well enclosed by mature vegetation, there is no encroachment into the countryside;<br><br>4. There are no designated or non-designated Heritage Assets close to the site and therefore the setting and special historic character of towns would not be impacted upon; and<br><br>5. The site would assist in urban regeneration, by encouraging the recycling of derelict and other urban land.<br><br>The site meets the two key Planning issues that places for non-strategic growth are assessed against on Page 57 of the Consultation Document, namely: creating sustainable patterns of development; and a sequential approach to Flood Risk. A completed Call for Sites Form accompanies this Submission. |
| **Attached documents** | Common Road Site Plan.pdf (189 KB)<br>Harvey Shopfitters Ltd (Mr. Andrew Harvey) - Rackham Planning (Mr. Will Collins).pdf (630 KB) |

| | |
|---|---|
| **Respondent Name** | Mr. and Mrs. Drew and Mrs. S. M. Bennett |
| **Comment ID** | 19722081/1888 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | As made clear at the outset of this Submission I represent the owners of Land at Cromhall, where Representations have previously been made as part of the adopted process for the Policies, Sites and Places Development Plan Document and the Emerging West of England Joint Spatial Plan (JSP) process (Site Reference: SG121). Furthermore, as requested a new Call for Sites Form has also been completed to reinforce the availability and suitability of this site.<br><br>I am hugely heartened that all the previous Representations about this site forming a suitable location to achieve proportionate growth at Cromhall (thereby assisting the overall sustainability of the village), not dovetails wholly with the Development Strategy envisaged in the LPCD, whereby non strategic growth will take place at suitable villages to help achieve the 1,300 rural dwellings that are required. Cromhall is an ideal village to achieve such proportionate growth that is envisaged in the LPCD, and crucially is an Option 1 village, in that it is located outside of the village.<br><br>As stressed in the Call for Sites Representation, we are most keen to work with the Council (and other local Stakeholders) to detail up the envisaged development principles for this site (a mixed use scheme of some 25 dwellings and 0.2ha of B1 business development), and create a scheme that fully harmonises with the emerging LPCD non strategic site Development Strategy and creates a beneficial form of growth for Cromhall. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | JFG Gunnery |
| **Comment ID** | 19741793/1977 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |

| | |
|---|---|
| **Comment** | Please see attached information in response to Land at Church Lane, Elberton. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ellen Kenny - Siston Parish Council |
| **Comment ID** | 7853761/2026 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | **Recommend**<br><br>*The records show that during Consultation on the Policies, Sites and Places Plan 2014 a Submission was made for development at The Griffin site and land to the rear. The Griffin site lies adjacent to London Road (A420) and Webbs Heath Road which joins the Bath Road(A4175) just South of the Site. This site is located immediately to the North of the Settlement Boundary and is in the Green Belt. Part of the Site (The Griffin and associated hardstanding) is Brownfield, the remainder is agricultural grassland. The Griffin is a Listed Building.*<br><br>*Members see merit in progressing this site for investigation due to its unusual edge of Green Belt and end of residential development Settlement Boundary. Subject to it providing identified benefits for the locality, a sensitive and attractive residential development forming a welcoming gateway appearance, such a development should be easily contained by the adjacent road network.*<br><br>*In the event of this site being selected for housing allocation, Members would expect its Green Belt Policy and boundary to be immediately redefined as part of the site progression process.*<br><br>**Submitted by Cllr John Hunt in advance of the meeting of Siston Parish Council on Thursday 15th March 2018 providing relevant background information and recommendations for the consideration of those present on that occasion.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alex Atkinson - Edward Ware Homes (Land East of the A4174, Shortwood) |
| **Comment ID** | 19323937/2102 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Edward Ware Homes (Mr. Alex Atkinson) - Pegasus Group (Mr. Daniel Weaver).pdf (2.6 MB) |

| | |
|---|---|
| **Respondent Name** | Alex Atkinson - Edward Ware Homes (Land at Woodhouse Down, Almondsbury) |
| **Comment ID** | 20248001/2123 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Edward Ware Homes (Mr. Alex Atkinson) - Pegasus Group (Mr. Daniel Weaver).pdf (14.4 MB) |

| | |
|---|---|
| **Respondent Name** | Crest Strategic Projects & Crest Nicholson (South West) Limited |
| **Comment ID** | 20274273/2173 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | 20) A Call for Sites Form together with title information and a redline Site Plan has been submitted. This information demonstrates this site is appropriate for allocation and is developable and deliverable in the next 5 years. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Russell Lyons |
| **Comment ID** | 20291201/2189 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | Our Client owns approximately 1.2ha of land that is partially within the Winterbourne Settlement Boundary that we consider is in an excellent location for non-strategic growth in a settlement identified as having development potential in the Local Plan Consultation Document. |

| | |
|---|---|
| | A Site Location Plan is attached to this Response Form and shows the site extends from Beacon Lane in a rectangular shape demarked by traditional field boundaries to the North, East and West. An existing vehicular access is situated off Beacon Lane that currently serves the host property Glenfrome, which has extant Consent for its demolition and replacement with 4no. terrace dwellings. There is also a number of outbuildings on the site that were associated with the market garden, positioned in the South-Western corner. The site can therefore be considered as partially previously developed land. There are a number of trees dotted around the site's boundary of varying heights and also some established hedgerows however it is understood they are not subject to a Tree Preservation Order.<br><br>To the North and North East of the site lie agricultural fields that are set to the South of Church Lane. To the East of the site lies Winterbourne Allotments, which are accessed from the South East corner off the High Street or Beacon Lane. Beyond the Allotments, approximately 150m away from the site boundary, lies the Winterbourne Settlement Boundary and specifically the High Street with all of its shops. Services and facilities. To the South lie residential properties within the Winterbourne Settlement Boundary. These are two storey semi-detached/terrace properties that front onto Beacon Lane. They are predominantly faced in render with concrete tiles. To the South West of the site lies Winstone House. This is a large detached property that has a live Planning Application which is yet to be determined for the erection of 5no. dwellings.<br><br>An extract from the South Gloucestershire Policies Map is shown below and confirms the site's location (marked with a red line) within the Green Belt and adjacent to the Winterbourne Settlement Boundary (marked with a black line). It also confirms that there are no Heritage Assets (either designated or non-designated) that effect the site. The nearest Listed Buildings are located 450m to the North West of the site at Court Farm. The site is located within Flood Zone 1, the area least at risk of flooding.<br><br>*Figure 1 – Extract from the South Gloucestershire Council Policies Map*<br><br>Please see the attached Document for Figure 1 which is referenced above.<br><br>The site is on the edge of the Settlement Boundary and is considered to be suitable for a release from the Green Belt given that it would form a logical extension to the settlement. Winterbourne Settlement Boundary already extends in a linear form along Beacon Lane. The inclusion of this site within the Winterbourne Settlement Boundary would allow the village to extend in a continuation of its traditional form without extending any further West towards the Bristol urban area. The site is located close enough to Winterbourne that it would be read against the backdrop of a significant amount of built form and therefore any development would have limited visual impact in the public realm.<br><br>The existing access point to the site – off Beacon Lane could be used as part of any future residential development. There is also a public footpath that runs along the Northern boundary of the site and the Winterbourne Allotments, connecting the site with Winterbourne High Street. The Northbound bus stop to Yate is located 250m away on Winterbourne High Street and the Southbound bus stop to Bristol is also located 250 metres away on Dragon Road; within comfortable walking distance. Both bus stops are served by pavements that ensure safe and secure access for pedestrians.<br><br>Development of this site and its release from the Green Belt would not conflict with the Purposes of Green Belt land in that the development of this partially previously developed site would not have any harmful or adverse impact on:<br><br>1. The unrestricted sprawl of large built up areas – Winterbourne is identified as a sustainable rural settlement and village and as such is not a large built up area;<br><br>2. There will be no impact on towns merging with one another; the Settlement Boundary would not need to be redrawn any further West;<br><br>3. Given the site is partially previously developed land and is well enclosed by mature vegetation, there is no encroachment into the countryside;<br><br>4. There are no designated or non-designated Heritage Assets close to the site (nearest Listed Buildings are 450m away) and therefore the setting and special historic character of towns would not be impacted upon; and<br><br>5. Non-strategic sites in the South Gloucestershire Green Belt need to be brought forward to meet the Authority's housing targets, as set out in the JSP, and so the development of this site would not conflict with the recycling of derelict and other urban land which should also come forward for housing.<br><br>The site meets the two key Planning issues that places for non-strategic growth are assessed against on Page 57 of the Consultation Document, namely: creating sustainable patterns of development; and a sequential approach to Flood Risk.<br><br>A completed Call for Sites Form accompanies this Submission. |
| **Attached documents** | Russell Lyons - Rackham Planning (Mr. Will Collins).pdf (640 KB) |

| | |
|---|---|
| **Respondent Name** | Land at Bromley Heath Landowners |
| **Comment ID** | 20293793/2196 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |

| | |
|---|---|
| **Comment** | 47. A Call for Sites Form together with a red line Site Plan has been submitted alongside transport information and these Representations. This information demonstrates this site is appropriate for allocation and is developable and deliverable in the next 5 years. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Strategic Land Partnerships/ Mr. S. Jarrett |
| **Comment ID** | 20312833/2210 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | 33) A Call for Sites Form together with title information and a red line Site Plan has been submitted alongside transport information and these Representations. This information demonstrates this site is appropriate for allocation and is developable and deliverable in the next 5 years. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ashfield Land |
| **Comment ID** | 16658689/2279 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | ***3.5 If you have land/buildings that you wish the Council to consider for non-strategic growth in rural places please complete a Call for Sites Form which can be found at www.southglos.gov.uk/callforsites***<br><br>8.28 We have provided extensive detail in respect Ashfield Land's land interests at Castle Farm Road, Hanham as part of these Representations and in the accompanying Appendices. It is our opinion that the land represents a highly sustainable location for housing growth and should be allocated for circa 180 dwellings and supporting public open space and infrastructure.<br><br>8.29 We would be happy to provide Officers with any further technical assessment work that would be useful to aid the consideration of this site and we will be contacting the Planning Policy Department shortly to arrange a meeting to discuss this further.<br><br>8.30 We have also completed a separate Call for Sites Form in respect to the land and submitted this to the Council separately. |
| **Attached documents** | Ashfield Land - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (30.0 MB) |

| | |
|---|---|
| **Respondent Name** | Fortannia Ltd |
| **Comment ID** | 19741217/2326 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | ***3.5 If you have land/buildings that you wish the Council to consider for non-strategic growth in rural places please.***<br><br>Please see Call for Sites Submission – Land at Vattingstone Lane, Alveston. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Redrow Homes South West, Julia Wallington, Debra Turner, Andrew Williams, Chr... |
| **Comment ID** | 20167105/2347 |
| **Document Part Name** | Question 03.5 If you have land/buidlings that you wish the council ot consider for non-strategic growth in rural places please complete a Call for Sites form (See Question 20) |
| **Comment** | 8.27 We have provided extensive detail in respect to Redrow's interests at Land North of Iron Acton Way and East of Dyer's Lane as part of these Representations and in the accompanying Appendices. It is our opinion that the land represents a highly sustainable location for housing growth and should be allocated for circa 150 dwellings and supporting public open space and infrastructure.<br><br>8.28 We would be happy to provide Officers with any further Technical Assessment work that would be useful to aid the consideration of this site and we will be contacting the Planning Policy Department shortly to arrange a meeting to discuss this further.<br><br>8.29 We have also completed a separate Call for Sites Form in respect to the land and submitted this to the Council separately. |
| **Attached documents** | Redrow Homes South West and Others - Grass Roots Planning (Mr. Matthew Kendrick).pdf (7.2 MB) |

| | |
|---|---|
| **Respondent Name** | Margaret Pinder - Sustainable Thornbury |
| **Comment ID** | 19372321/58 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | We agree with this approach to create lifetime neighbourhoods in order for each community to be inclusive and viable in the long term. |

| | |
|---|---|
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anne Gale |
| **Comment ID** | 16344321/126 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | The Green Belt should be kept green and nurtured. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Martin Gillian |
| **Comment ID** | 19445537/148 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | Regarding Designated Green Spaces. It is important to recognise that land that does not have direct public access, and can still be viewed as an important Green Space. For example a collection of residential gardens containing wildlife habitat and or trees can be; an important landscape marker; an important view from outside a village; or an important wildlife habitat. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Oliver Simmonds |
| **Comment ID** | 19446017/153 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | I endorse this proposal. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Thompson |
| **Comment ID** | 17795873/167 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | No. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Lyn Haigh - Rangeworthy Parish Council |
| **Comment ID** | 2301601/186 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | I applaud the aims but cannot see how they can be balanced with the non-strategic smaller developments envisaged for villages since almost all healthcare provision is located in the towns and most agents of Social Care travel by car to the villages from the towns where they live. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Philip Box |
| **Comment ID** | 19453025/198 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | Greater specific attention must be paid within the design principles to arresting the dramatic decline in the UK's Biodiversity, as evidenced in the RSPB's State of Nature Report. This is in line with the UK's obligations under the UN Convention on Biodiversity and Biodiversity Action Plan (including most recently the objectives of the 25 Year Plan for nature). This must be reflected in the insistence of principles such as (rigorously defined) "net gain for nature" in new developments, as well as environmentally sound construction practices. This should prioritise the enhancement and preservation of existing natural infrastructure, alongside the integration of genuinely environmentally friendly features, such as street trees, and the reduction of artificial surfaces or topsoil removal. This should follow the recommendations of the Wildlife Trusts, which insist on net gain for nature being defined through a refined version of the 2012 DEFRA Biodiversity Metric.<br><br>Emphasis on "access" to natural infrastructure et cetera must not be a substitute for, or override, the imperative of natural preservation and enhancement. A truly sustainable approach cannot proceed on the basis of anthropocentric pleasure seeking alone, or be tempted to do so. This is to ensure that natural assets are genuinely preserved, and the lot of nature enhanced, rather than degraded through unsustainable human use advanced for promotional purposes. This includes acknowledging and integrating problems such as environmental damage i.e. littering occurring, from greater footfall or human presence. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Gillian Sanders - Wessex Water |

| | |
|---|---|
| **Comment ID** | 19455361/234 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | We welcome the approach of the additional emphasis on inclusive design and ensuring health and wellbeing objectives for the combined High Quality Design and Health Impact Assessments Policy. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Helen Johnstone - Stroud District Council |
| **Comment ID** | 14317537/252 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | 1. Support the introduction of an additional Policy emphasis promoting inclusive design to ensure new development is flexible, adaptable and accessible to all and promoting healthy, well balanced, lifetime neighbourhoods alongside existing Policy objectives relating to high quality design, local distinctiveness, Health Impact Assessments and Private Amenity Space Standards. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Lesley Brown |
| **Comment ID** | 16384673/293 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | I agree that there should be importance placed on the affects on health and wellbeing of the built environment. Mistakes made at Charlton Hayes should not be allowed to happen again and the views of Health Officials really listened to and acted upon. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Chris Willmore - Yate Town Council |
| **Comment ID** | 330593/304 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | I have attached a Word Document with Comments from Yate Town Council. |
| **Attached documents** | Yate Town Council Local Plan Consultation Response April 2018.docx (36 KB) |

| | |
|---|---|
| **Respondent Name** | Sarah Blackmore |
| **Comment ID** | 16193889/310 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | Do you have any Comments on the additional emphasis on inclusive design and ensuring health and wellbeing objectives for the combined High Quality Design and Health Impact Assessments Policy?<br><br>I believe that the consideration and recognition of the links between the built environment and health & wellbeing are good practice and show a long term vision to provide healthy environments for residents. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Claire Young |
| **Comment ID** | 916289/338 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | I support the additional emphasis on inclusive design and ensuring health and wellbeing impacts. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Simmons - Westerleigh Parish Council |
| **Comment ID** | 17221409/404 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **4A. High Quality Design and Health Impact Assessments (HIAs):**<br><br>**Do you have any comments on the additional emphasis on inclusive design and ensuring health and wellbeing objectives for the combined High Quality Design and Health Impact Assessments Policy?** |

| | |
|---|---|
| | **WPC believes that the links between the built environment and health & wellbeing are good practice and show a long term vision to provide healthy environments for residents.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kevin Wilkinson - Avon and Somerset Police |
| **Comment ID** | 1052481/421 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | It is essential that the existing Section 9 of Policy CS1 is retained. In fact to fully take into account changes in legislation and Policy since the publication of the Core Strategy it should now include anti-social behaviour, drugs and alcohol as well as crime and fear of crime.<br><br>Currently Health Impact Assessments often fail to consider the emotional costs of crime, a burglary victim can sustain serious health issues following an offence.<br><br>Wellbeing and health initiatives often seek to encourage walking and cycling but residents will only do so if routes are safe. Recently a failure of a development's Landscaping Policy contributed to the circumstances of a . This led to the victim being required to pass the scene of the offence every time left home address, subsequently obviously had to move house.<br><br>The emphasis on being inclusive is fine as long as the “Can be used safely” includes safety from crime. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alveston, Rudgeway, and Earthcott Parish Council |
| **Comment ID** | 19784545/435 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **Yes , it’s a good idea where the infrastructure would support this. In some isolated villages it could prove challenging.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Donna Ford - Iron Acton Parish Council |
| **Comment ID** | 1060385/463 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **High Quality Design:**<br><br>Iron Acton Parish Council welcomes the proposals for inclusive design to “meet the needs of all regardless of ability, age, gender, ethnicity or economic circumstances” and the commitment to “lifetime neighbourhoods” able to adapt as lifestyles change. Both are particularly important for development in small settlements where the range of housing available to local people is likely to be more limited than in urban environments. It also strongly supports the commitment to “local distinctiveness,” and as argued above in the context of the proposed North West Yate development believes this should include incorporation of architectural references to the vernacular aesthetic of local areas. The Parish Council is of the view, in particular, that new development should reflect and continue South Gloucestershire’s rich history of local building styles and materials. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | J. Bond |
| **Comment ID** | 17779105/475 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | Design sympathetic to the design of neighbouring buildings and the character of the local area. Not forgetting the adverse effects on health of noise pollution, and the need for adequate sound insulation.<br><br>Above applies to Affordable Housing, "affordable" should be a relative term appropriate to the context of the local area. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christine Hunter |
| **Comment ID** | 19809025/489 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **High Quality Design:** |

| | |
|---|---|
| | I support proposals for inclusive design to “meet the needs of all regardless of ability, age, gender, ethnicity or economic circumstances” and the commitment to “lifetime neighbourhoods” able to adapt as lifestyles change. Both are particularly important for development in small settlements where the range of housing available to local people is likely to be more limited than in urban environments. I welcome the commitment to “local distinctiveness” and, as argued above, this should mean it is in keeping with the historic feel of local areas and historic building styles and materials. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alan Jones - Hanham District Green Belt Conservation Society |
| **Comment ID** | 17236353/507 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | The sentiment of these Policies must corrollate to the ethics that are already in place. The obvious Health & Wellbeing advantages of green spaces will be obliterated if these Policies are applied to new developments in the Green Belt!<br><br>It is difficult to comment, but we wonder where have “… different people” said they need? and from where have “consideration of local needs been gathered?<br><br>We cannot see that you can have “ Lifetime neighbourhoods” when construction of these areas impact on CO2 emissions. |
| **Attached documents** | Hanham District Green Belt Conservation Society (Alan Jones).pdf (20.3 MB) |

| | |
|---|---|
| **Respondent Name** | Roy Crew |
| **Comment ID** | 3973121/532 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | My Responses to the specific Local Plan Questions:<br><br>Question 4:<br><br>Any construction will impact on CO2 levels. We therefore need green spaces to break up urban sprawl and to give areas where pollution can be diluted. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Paul Chapman - Iron Acton Parish Council |
| **Comment ID** | 19809537/555 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **High Quality Design**:<br><br>I support proposals for inclusive design to “meet the needs of all regardless of ability, age, gender, ethnicity or economic circumstances” and the commitment to “lifetime neighbourhoods” able to adapt as lifestyles change. Both are particularly important for development in small settlements where the range of housing available to local people is likely to be more limited than in urban environments. I welcome the commitment to “local distinctiveness” and, as argued above, this should mean it is in keeping with the historic feel of local areas and historic building styles and materials. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David Hatherell |
| **Comment ID** | 19830849/570 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **High Quality Design:**<br><br>I support proposals for inclusive design to “meet the needs of all regardless of ability, age, gender, ethnicity or economic circumstances” and the commitment to “lifetime neighbourhoods” able to adapt as lifestyles change. Both are particularly important for development in small settlements where the range of housing available to local people is likely to be more limited than in urban environments. I welcome the commitment to “local distinctiveness” and, as argued above, this should mean it is in keeping with the historic feel of local areas and historic building styles and materials. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | John O'Donnell |

| | |
|---|---|
| **Comment ID** | 18604385/581 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **High Quality Design:**<br><br>I support proposals for inclusive design to “meet the needs of all regardless of ability, age, gender, ethnicity or economic circumstances” and the commitment to “lifetime neighbourhoods” able to adapt as lifestyles change. Both are particularly important for development in small settlements where the range of housing available to local people is likely to be more limited than in urban environments. I welcome the commitment to “local distinctiveness” and, as argued above, this should mean it is in keeping with the historic feel of local areas and historic building styles and materials. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Joseph Hatherell |
| **Comment ID** | 19831681/592 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **High Quality Design:**<br><br>I support proposals for inclusive design to “meet the needs of all regardless of ability, age, gender, ethnicity or economic circumstances” and the commitment to “lifetime neighbourhoods” able to adapt as lifestyles change. Both are particularly important for development in small settlements where the range of housing available to local people is likely to be more limited than in urban environments. I welcome the commitment to “local distinctiveness” and, as argued above, this should mean it is in keeping with the historic feel of local areas and historic building styles and materials. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Daphne Dunning - Cromhall Parish Council |
| **Comment ID** | 16475073/607 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | 4.<br><br>The Council sees No reason to Comment on this as we cannot see any hard evidence that Plans are in place to support this and the surrounding communities, this Section is related to areas that will receive funding and not just receive a huge influx of housing and a token set of swings on a patch of grass. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Karen Longden |
| **Comment ID** | 19831809/613 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **High Quality Design:**<br><br>The designs to “meet the needs of all regardless of ability, age, gender, ethnicity or economic circumstances” and the commitment to “lifetime neighbourhoods,” I agree with. Any proposed development should be in keeping with the historic style of an area. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Jane Driver |
| **Comment ID** | 5134785/625 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **High Quality Design:**<br><br>I support proposals for inclusive design to “meet the needs of all regardless of ability, age, gender, ethnicity or economic circumstances” and the commitment to “lifetime neighbourhoods” able to adapt as lifestyles change. Both are particularly important for development in small settlements where the range of housing available to local people is likely to be more limited than in urban environments. I welcome the commitment to “local distinctiveness” and, as argued above, this should mean it is in keeping with the historic feel of local areas and historic building styles and materials. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Diana Porter-Smith |
| **Comment ID** | 10874433/636 |

| | |
|---|---|
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **High Quality Design:**<br><br>I support proposals for inclusive design to “meet the needs of all regardless of ability, age, gender, ethnicity or economic circumstances” and the commitment to “lifetime neighbourhoods” able to adapt as lifestyles change. Both are particularly important for development in small settlements where the range of housing available to local people is likely to be more limited than in urban environments. I welcome the commitment to “local distinctiveness” and, as argued above, this should mean it is in keeping with the historic feel of local areas and historic building styles and materials. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Michael Keenan |
| **Comment ID** | 2796353/648 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **High Quality Design:**<br><br>I support proposals for inclusive design to “meet the needs of all regardless of ability, age, gender, ethnicity or economic circumstances” and the commitment to “lifetime neighbourhoods” able to adapt as lifestyles change. Both are particularly important for development in small settlements where the range of housing available to local people is likely to be more limited than in urban environments. I welcome the commitment to “local distinctiveness” and, as argued above, this should mean it is in keeping with the historic feel of local areas and historic building styles and materials. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Richard Hunter |
| **Comment ID** | 12513441/663 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **High Quality Design:**<br><br>I support proposals for inclusive design to “meet the needs of all regardless of ability, age, gender, ethnicity or economic circumstances” and the commitment to “lifetime neighbourhoods” able to adapt as lifestyles change. Both are particularly important for development in small settlements where the range of housing available to local people is likely to be more limited than in urban environments. I welcome the commitment to “local distinctiveness” and, as argued above, this should mean it is in keeping with the historic feel of local areas and historic building styles and materials. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Zoe Hancock - Bristol Avon Catchment Partnership |
| **Comment ID** | 19832225/679 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | We welcome the approach of the additional emphasis on inclusive design and ensuring health and wellbeing objectives for the combined high-quality design and Health Impact Assessments Policy. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Rosemary White |
| **Comment ID** | 10707009/697 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | High Quality Design:<br><br>I support proposals for inclusive design to "meet the needs of all regardless of ability, age, gender, ethnicity or economic circumstances" and the commitment to "lifetime neighbourhoods" able to adapt as lifestyles change. Both are particularly important for development in small settlements where the range of housing available to local people is likely to be more limited than in urban environments. I welcome the commitment to "local distinctiveness" and, as argued above, this should mean it is in keeping with the historic feel of local areas and historic building styles and materials. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Purchase |
| **Comment ID** | 2804385/708 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |

| | |
|---|---|
| **Comment** | **High Quality Design:**<br><br>I support proposals for inclusive design to "meet the needs of all regardless of ability, age, gender, ethnicity or economic circumstances" and the commitment to "lifetime neighbourhoods" able to adapt as lifestyles change. Both are particularly important for development in small settlements where the range of housing available to local people is likely to be more limited than in urban environments. I welcome the commitment to "local distinctiveness" and, as argued above, this should mean it is in keeping with the historic feel of local areas and historic building styles and materials. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Amy Shepherd - Somerset County Council |
| **Comment ID** | 11460449/727 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | The Consultation seeks Response to a number of Questions and the County Council Acoustics Specialist considers noise and vibration may be pertinent to the following:<br><br>**Question 4:**<br><br>***High Quality Design and Health Impact Assessments (HIAs):***<br><br>**Do you have any Comments on the additional emphasis on inclusive design and ensuring health and wellbeing objectives for the combined High Quality Design and Health Impact Assessments Policy?**<br><br>In the view of the County Council Acoustics Specialist there are strong links between improving wellbeing outcomes and good building design. An important requirement of design is its ability to adequately mitigate noise and vibration impacts, when these are present, and Policy should encourage developers to adequately demonstrate this during Planning consideration.<br><br>The only Policy of those listed for inclusion within HIA, that might be have introduced consideration of acoustic issues, would be PSP43 'Private Amenity Space Standards.' However the County Council Acoustics Specialist finds this makes no mention of noise. Consideration of noise mitigation is important if external amenity is to be provided within new development. While the need for noise mitigation is not identified it would also appear the stated Policy requirement to maximise sunlight could be found to conflict with any design attempt to use building form to mitigate noise in an external area.<br><br>Inclusive design of external and internal space might be promoted by making additional reference to PSP8 'Residential Amenity' as this then links with the Technical Advice Note: Assessing Residential Amenity. In my view it may also be helpful to identify ProPG Professional Practice Guidance on Planning & Noise - New Residential Development (see link) in respect to considering new housing when effected by transportation noise. The County Council Acoustics Specialist notes without a Policy reference to PSP8 there would be no consideration of vibration impacts and this would be particularly important to multi occupancy conversion of property (as identified in Question 11) or for development in some locations.<br><br>The consideration of the SGLP and PSP9 'Health Impact Assessments' indicates no mention of the Public Health Outcomes Framework 2017 (DHSC). This Framework may be worthy of note as it requires Local Authorities to consider 67 Indicators when assessing the outcome of their Public Health functions. In the view of the County Council Acoustics Specialist both the standards of new housing design, and chosen development location, have direct influence on Noise Indicator 1.14 (The percentage of the population affected by noise). This Indicator is associated with three aspects of noise, namely complaints (1.14i), transport exposure (daytime 1.14ii & night-time 1.14iii) (see PHOF_Part_2.pdf ). Inappropriate location of housing and ineffective mitigation of noise can influence all components of Indicator 1.14. The location of housing that does not worsen Indicators 1.14ii and 1.14iii will also then, not be in direct conflict with any local Noise Action Plan.<br><br>The County Council Acoustics Specialist notes that reference is made to Core Strategy CS1 'High Quality Design' and would suggest the aim of CS1 might also express requirements for effective mitigation of existing noise (or vibration). Responsibility for mitigation in new design is likely to be further clarified in the proposals to introduce the concept of 'agent of change' in the NPPF. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Suzanna Keenan |
| **Comment ID** | 17805057/751 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **High Quality Design:**<br><br>I support proposals for inclusive design to "meet the needs of all regardless of ability, age, gender, ethnicity or economic circumstances" and the commitment to "lifetime neighbourhoods" able to adapt as lifestyles change. Both are particularly important for development in small settlements where the range of housing available to local people is likely to be more limited than in urban environments. I welcome the commitment to "local distinctiveness" and, as argued above, this should mean it is in keeping with the historic feel of local areas and historic building styles and materials. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Simon Whittard |
| **Comment ID** | 12489153/763 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **High Quality Design:**<br><br>I support proposals for inclusive design to “meet the needs of all regardless of ability, age, gender, ethnicity or economic circumstances” and the commitment to “lifetime neighbourhoods” able to adapt as lifestyles change. Both are particularly important for development in small settlements where the range of housing available to local people is likely to be more limited than in urban environments. I welcome the commitment to “local distinctiveness” and, as argued above, this should mean it is in keeping with the historic feel of local areas and historic building styles and materials. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Heather Elgar - West of England Nature Partnership |
| **Comment ID** | 19839553/791 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | Please find below Comments from the West of England Nature Partnership (WENP) in response to the South Gloucestershire Local Plan Consultation.<br><br>For transparency, please know that Dominic Mellon (Consultant in Public Health for South Gloucestershire Council) sits on the WENP Board and thus note a declared conflict of interests. This Response reflects the aims and objectives of the Partnership and does not reflect views of individual Board members.<br><br>Question 4: High Quality Design and Health Impact Assessments (HIAs):<br><br>WENP welcome the approach of additional emphasis on inclusive design and ensuring health and wellbeing objectives for the combined High Quality Design and Health Impact Assessments Policy. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Robert and Diana Pardoe |
| **Comment ID** | 10784545/810 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **High Quality Design:**<br><br>I support proposals for inclusive design to “meet the needs of all regardless of ability, age, gender, ethnicity or economic circumstances” and the commitment to “lifetime neighbourhoods” able to adapt as lifestyles change. Both are particularly important for development in small settlements where the range of housing available to local people is likely to be more limited than in urban environments. I welcome the commitment to “local distinctiveness” and, as argued above, this should mean it is in keeping with the historic feel of local areas and historic building styles and materials. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Brian Hackland |
| **Comment ID** | 8354337/827 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **High Quality Design:**<br><br>There is a widely shared perception that the design quality of much new development is deficient, and that Space Standards have become too mean. I support proposals for inclusive design to “meet the needs of all regardless of ability, age, gender, ethnicity or economic circumstances” and the commitment to “lifetime neighbourhoods” able to adapt as lifestyles change. Both are particularly important for development in small settlements where the range of housing available to local people is likely to be more limited than in urban environments. I welcome the commitment to “local distinctiveness” and, as argued above, this should mean it is in keeping with the historic feel of local areas and historic building styles and materials. While we undoubtedly need an increase in the supply of housing, particularly affordable, social rented housing, this should not be used as the justification for shoddy or cramped new-build. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anna Webster |
| **Comment ID** | 19843617/838 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |

| | |
|---|---|
| **Comment** | **High Quality Design:**<br><br>I support proposals for inclusive design to “meet the needs of all regardless of ability, age, gender, ethnicity or economic circumstances” and the commitment to “lifetime neighbourhoods” able to adapt as lifestyles change. Both are particularly important for development in small settlements where the range of housing available to local people is likely to be more limited than in urban environments. I welcome the commitment to “local distinctiveness” and, as argued above, this should mean it is in keeping with the historic feel of local areas and historic building styles and materials. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Victoria & John Vlietstra |
| **Comment ID** | 19843937/849 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **High Quality Design:**<br><br>We support proposals for inclusive design to “meet the needs of all regardless of ability, age, gender, ethnicity or economic circumstances” and the commitment to “lifetime neighbourhoods” able to adapt as lifestyles change. Both are particularly important for development in small settlements where the range of housing available to local people is likely to be more limited than in urban environments. We welcome the commitment to “local distinctiveness” and, as argued above, this should mean it is in keeping with the historic feel of local areas and historic building styles and materials. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christina Fussell |
| **Comment ID** | 19843969/860 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **High Quality Design:**<br><br>I support proposals for inclusive design to “meet the needs of all regardless of ability, age, gender, ethnicity or economic circumstances” and the commitment to “lifetime neighbourhoods” able to adapt as lifestyles change. Both are particularly important for development in small settlements where the range of housing available to local people is likely to be more limited than in urban environments. I welcome the commitment to “local distinctiveness” and, as argued above, this should mean it is in keeping with the historic feel of local areas and historic building styles and materials. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Paul Fussell |
| **Comment ID** | 19844001/871 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **High Quality Design:**<br><br>I support proposals for inclusive design to “meet the needs of all regardless of ability, age, gender, ethnicity or economic circumstances” and the commitment to “lifetime neighbourhoods” able to adapt as lifestyles change. Both are particularly important for development in small settlements where the range of housing available to local people is likely to be more limited than in urban environments. I welcome the commitment to “local distinctiveness” and, as argued above, this should mean it is in keeping with the historic feel of local areas and historic building styles and materials. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Oliver Fussell |
| **Comment ID** | 10784449/883 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **High Quality Design:**<br><br>I support proposals for inclusive design to “meet the needs of all regardless of ability, age, gender, ethnicity or economic circumstances” and the commitment to “lifetime neighbourhoods” able to adapt as lifestyles change. Both are particularly important for development in small settlements where the range of housing available to local people is likely to be more limited than in urban environments. I welcome the commitment to “local distinctiveness” and, as argued above, this should mean it is in keeping with the historic feel of local areas and historic building styles and materials. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tom Barnes |
| **Comment ID** | 19844673/894 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **High Quality Design:**<br><br>I support proposals for inclusive design to “meet the needs of all regardless of ability, age, gender, ethnicity or economic circumstances” and the commitment to “lifetime neighbourhoods” able to adapt as lifestyles change. Both are particularly important for development in small settlements where the range of housing available to local people is likely to be more limited than in urban environments. I welcome the commitment to “local distinctiveness” and, as argued above, this should mean it is in keeping with the historic feel of local areas and historic building styles and materials. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Peter Barker - Latteridge Road Community Group |
| **Comment ID** | 6622945/939 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **High Quality Design:**<br><br>I support proposals for inclusive design to “meet the needs of all regardless of ability, age, gender, ethnicity or economic circumstances” and the commitment to “lifetime neighbourhoods” able to adapt as lifestyles change. Both are particularly important for development in small settlements where the range of housing available to local people is likely to be more limited than in urban environments. I welcome the commitment to “local distinctiveness” and, as argued above, this should mean it is in keeping with the historic feel of local areas and historic building styles and materials. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kate Edmonds |
| **Comment ID** | 19883393/950 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **High Quality Design:**<br><br>I support proposals for inclusive design to “meet the needs of all regardless of ability, age, gender, ethnicity or economic circumstances” and the commitment to “lifetime neighbourhoods” able to adapt as lifestyles change. Both are particularly important for development in small settlements where the range of housing available to local people is likely to be more limited than in urban environments. I welcome the commitment to “local distinctiveness” and, as argued above, this should mean it is in keeping with the historic feel of local areas and historic building styles and materials. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David and Tracey Jones |
| **Comment ID** | 19883585/970 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **High Quality Design:**<br><br>I support proposals for inclusive design to “meet the needs of all regardless of ability, age, gender, ethnicity or economic circumstances” and the commitment to “lifetime neighbourhoods” able to adapt as lifestyles change. Both are particularly important for development in small settlements where the range of housing available to local people is likely to be more limited than in urban environments. I welcome the commitment to “local distinctiveness” and, as argued above, this should mean it is in keeping with the historic feel of local areas and historic building styles and materials. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Cate Davidson - Sodbury Town Council |
| **Comment ID** | 4877793/1011 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | Dear Planning Team,<br><br>Sodbury Town Council responds as follows to the Local Plan (non strategic) Consultation:<br><br>Q. 4 STC supports the principles. |

| | |
|---|---|
| | Please note the Comments as appropriate. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Gill and Mike Dunkley |
| **Comment ID** | 19845441/1064 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | Housing style should be of a scale/height/colour and size appropriate to the locality. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Clifton Homes Ltd |
| **Comment ID** | 16617921/1086 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **Please see submitted Representations.** |
| **Attached documents** | Clifton Homes Ltd - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (1.7 MB) |

| | |
|---|---|
| **Respondent Name** | Barwood Development Securities Ltd and The Thornbury Landowner Consortium |
| **Comment ID** | 19884545/1096 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | Please find attached Representation. |
| **Attached documents** | Barwood Development Securities Ltd and The Thornbury Landowner Consortium - Savills (Miss. Felicity Tozer).pdf (650 KB) |

| | |
|---|---|
| **Respondent Name** | South West Strategic Development and Ian and David Knipe |
| **Comment ID** | 19884577/1110 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | Please see submitted Representations. |
| **Attached documents** | SW Strategic Development and I. and D. Knipe - Grass Roots.pdf (27.4 MB) |

| | |
|---|---|
| **Respondent Name** | Progold Ltd |
| **Comment ID** | 19737665/1124 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | Please see submitted Representations. |
| **Attached documents** | Progold Ltd - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (7.9 MB) |

| | |
|---|---|
| **Respondent Name** | Susan E. Green - Home Builders Federation (HBF) |
| **Comment ID** | 10761601/1134 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | The HBF support the combination of Policies CS1: High Quality Design, PSP1: Local Distinctiveness, PSP9: Health Impact Assessments and PSP43: Private Amenity Standards into one comprehensive Policy thereby avoiding unnecessary repetition. However this proposed amalgamation should not introduce any additional or more onerous Policy requirements. In previous Local Plan Consultations the HBF raised objections to these Policies. The Council is reminded that the new Policy on health & wellbeing should not go beyond the general expectations of the NPPF that Planning will promote healthy communities. The NPPG (ID53-004) confirms that a Health Impact Assessment can serve a useful purpose at the Planning Application stage and that Consultation with the Director of Public Health as part of the process can establish whether a Health Impact Assessment would be a useful tool. However the requirement for the submission of a Health Impact Assessment for all major development without any specific evidence that individual schemes are likely to have a significant impact upon the health and wellbeing of the local population would not be justified by reference to the NPPG. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Emma Powell - Redrow Homes Limited |
| **Comment ID** | 19737921/1151 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |

| | |
|---|---|
| **Comment** | Part 3 - Policy Discussion Points:<br><br>Section 3 of the Local Plan Consultation sets out the titles of proposed Strategic Polices that will be included in the next version of the Local Plan. As such we do not have any Comments on the titles, but reserve our position to Comment on the detailed wording at the next Consultation. All Policies will need to be prepared in the context of the emerging NPPF, a final version is expected to published in the next few Months. The Strategic Policies will also need to reflect any changes to the West of England JSP as it progresses through the Examination towards adoption anticipated later in 2019.<br><br>**Question 4:**<br><br>**A. High Quality Design and Health Impact Assessments (HIAs)**<br><br>**Do you have any Comments on the additional emphasis on inclusive design and ensuring health and wellbeing objectives for the combined high-quality design and Health Impact Assessments Policy?**<br><br>It is noted that the intention is to combine existing Policies CS1 High Quality Design, PSP1 Local Distinctiveness, PSP9 Health Impact Assessments and PSP43 Private Amenity Space Standards, having one comprehensive Policy would avoid repetition. However, this proposed amalgamation should not introduce any additional or more onerous Policy requirements. |
| **Attached documents** | Redrow Homes Limited (Emma Powell) - Pegasus Group (Mrs. Sarah Hamilton-Foyn).pdf (34.1 MB) |

| | |
|---|---|
| **Respondent Name** | Phill Bamford - Gladman Developments Ltd |
| **Comment ID** | 15612065/1178 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **4.1 Question 4 – High Quality Design and Health Impact Assessments:**<br><br>4.1.1 Whilst the pursuit of High Quality Design is understandable, the Framework warns against overly prescriptive and detailed Design Policies being included in Local Plans. The Council will need to consider this, alongside any viability implications of the requirements set under this Policy. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Bloor Homes South West |
| **Comment ID** | 20096097/1306 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | In broad terms we are in support of encouraging development that incorporates inclusive design, and considers health and wellbeing. These concepts can be difficult to define, and the interpretation of whether development meets said objectives can also, therefore, be subjective. Our view is that the Council need to robustly evidence the need for any specific requests made under these Policies. A pragmatic approach should be adopted within any final Policy wording to ensure discussions around subjective interpretation as to whether or not a development adheres to these principles can be avoided. The inclusion of aspirational Policies to secure high quality design and developments that support health and inclusivity should not cause disproportionate complexity and delays to the determination of otherwise acceptable development.<br><br>In order to achieve a proportionate Policy context for these topics it is essential that the principles of inclusive design are clearly set out with sufficient detail to explain what is expected and required by the Policy. Prescriptive or arbitrary provisions, and/or thresholds for contributions should be avoided. Where specific guidance is being relied on, for example a requirement to adhere to Lifetime Homes Standards, these standards need to be sufficiently justified to show that these requirements are both necessary for development in South Gloucestershire and that meeting these standards will not be excessively onerous for development (in respect of viability and/or deliverability). A responsive, reasonable and flexible approach needs to be taken, and built into the Policy wording.<br><br>Within this Policy we request that the Council set out examples of how development may achieve relevant objectives, with examples supported by Evidence Base Documents showing how this has achieved the desired outcomes elsewhere. Any Policy should include flexibility; stating that each case will be determined on its own merits, that no arbitrary provision of onerous obligations will be sought and that a site specific flexible response from individual developments will be undertaken. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Adrian Edmonds |
| **Comment ID** | 19926305/1340 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **High Quality Design:**<br><br>I support proposals for inclusive design to “meet the needs of all regardless of ability, age, gender, ethnicity or economic circumstances” and the commitment to “lifetime neighbourhoods” able to adapt as lifestyles change. Both are particularly important for development in small settlements where the range of housing available to local people is likely to be more limited than in urban environments. I welcome the commitment to “local |

| | |
|---|---|
| | distinctiveness" and, as argued above, this should mean it is in keeping with the historic feel of local areas and historic building styles and materials. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hannah Saunders - Dodington Parish Council |
| **Comment ID** | 19931969/1610 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **COMMENTS:**<br><br>Members feel that this is a very important element on all new developments…… 'Delivery of lifetime neighbourhoods which are welcoming and accessible and inviting for everyone…….'<br><br>They feel this very strongly – as they don't want to see similar issues to what has happened in Normandy Drive on outskirts of Yate….<br><br>Developers should be encouraged to build a mix of housing to suit everyone from young couples – growing families – premises suitable for more mature people to downsize to. This would encourage vibrant all-age communities, resulting in areas where people will be able to put down roots and just move locally when their needs change. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | E. H. Schubert Will Trust |
| **Comment ID** | 12403425/1677 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | Should such a Design Policy be moved forward it is essential for inclusive living that development is set within a high quality, planned environment. Opportunities should be taken to offer development that is set within natural rural environments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Frampton Cotterell Parish Council |
| **Comment ID** | 20175105/1694 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | Frampton Cotterell Parish Council believes that there needs to be easy access to open spaces and footpaths. Reference should be made to the Village Design Statements and these should be taken into account. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | G. E. Forward |
| **Comment ID** | 20176577/1712 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | This suggested to me large luxury housing and building this type of development in the Green Belt would negate the health benefits of the Green Belt. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Bloor Homes (South West) |
| **Comment ID** | 20211105/1949 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | Please find attached Representation. |
| **Attached documents** | Local Plan 2018-36 - Coalpit Heath.pdf (205 KB)<br>Appendix 1 - Part 4.pdf (6.0 MB)<br>Appendix 1 - Part 2.pdf (6.7 MB)<br>Appendix 1 - Part 1.pdf (11.3 MB)<br>Appendix 1 - Part 6.pdf (17.4 MB)<br>Appendix 2.pdf (453 KB)<br>Appendix 1 - Part 3.pdf (7.3 MB)<br>Appendix 1 - Part 5.pdf (6.4 MB) |

| | |
|---|---|
| **Respondent Name** | JFG Gunnery |
| **Comment ID** | 19741793/1978 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |

| | |
|---|---|
| **Comment** | Should such a Design Policy be moved forward it is essential for inclusive living that development is set within a high quality, planned environment. Opportunities should be taken to offer development that is set within natural rural environments.<br><br>Whilst the principles support the delivery of lifetime neighbourhoods, it is sensible for the Plan to consider and refer to the delivery of lifetime homes. One such example are bungalows. Perhaps it would be sensible for the Local Plan to encourage such development through a specific helpful Policy which encourages this form of home and could result in the freeing up of conventional 2 (or more storey) homes to meet the requirements of larger families. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alex Atkinson - Edward Ware Homes (Land East of Coalpit Heath) |
| **Comment ID** | 20247169/2107 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Edward Ware Homes (Mr. Alex Atkinson) - Pegasus Group (Mr. Daniel Weaver).pdf (57.6 MB) |

| | |
|---|---|
| **Respondent Name** | Paul Davis - Persimmon Homes Severn Valley |
| **Comment ID** | 3553569/2142 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **8 Policy Discussion Points:**<br><br>Question 4 – High Quality Design and Health Impact Assessments:<br><br>8.1 The issues raised in this Section largely reflect current NPPF Guidance on promoting healthy and safe communities. They are expressed largely as aims and objectives which have a role to play in setting a Policy Framework on Design and Healthy Environments, but are not necessarily appropriate to be included as formal Local Plan Policies.<br><br>8.2 In addition, in respect of Health Impact Assessments we accept, as in NPPG Guidance (ID53-004), that they serve a purpose at the Planning Application stage and encourage Consultation with the Director of Public Health as part of the process to establish whether a HIA would be useful. However there should not be a blanket requirement for a HIA on all major schemes without a proper assessment of evidence. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | CEG and The Charfield Landowners Consortium |
| **Comment ID** | 16664993/2217 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **Policy Discussion Points:**<br><br>Part 3 of the Consultation Document sets out a summary of the Strategic Development Policy Structure proposed, along with more detailed Policy areas for comment and discussion. Reviewing the points raised in the Consultation, our Client has the following Comments to make:<br><br>**A: High Quality Design and Health Impact Assessments:**<br><br>Policy PSP6 already sets a requirement for major development to be screened to prepare Health Impact Assessments (HIA). Any new or revised Policy requirements in respect of HIAs or other Health and Wellbeing will need to be clear in its purpose and requirements. As an emerging area of Planning Policy and practice, there is a risk that ambiguous Policy requirements will not translate clearly to development outputs in practical terms. Any new Policy regarding Design, Health and Wellbeing should therefore be clear in its objectives and expectations from developers. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ashfield Land |
| **Comment ID** | 16658689/2280 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **Q4. High Quality Design and Health Impact Assessments (HIAs)**<br><br>**Do you have any Comments on the additional emphasis on inclusive design and ensuring health and wellbeing objectives for the combined High Quality Design and Health Impact Assessments Policy?**<br><br>8.31 We support this approach and agree that high quality design should be linked to health and wellbeing objectives. A key part of achieving these objectives relates to how the NLP develops its Spatial Strategy; if too much development is located where walking and cycling are not credible options, then the overall Policy aim will clearly be undermined.<br><br>8.32 This emphasises the need to place development in locations where sustainable and active modes of travel to everyday facilities and |

| | |
|---|---|
| | employment opportunities are easily available and the distances involved are achievable for a range of demographics. Many of these sites lie within the Green Belt and therefore the NLP must release sufficient land from the Green Belt to achieve this Policy aim.<br><br>8.33 Such release should also consider the potential benefits of securing accessible open space within the Green Belt where currently land ownership excludes open access to such land, making its contribution towards achieving active lifestyles limited. The Policy should consider additional criteria for sites released from the Green Belt to require them to enhance access recreational facilities and open space. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Amanda Scott |
| **Comment ID** | 20374561/2291 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **High Quality Design:**<br><br>I support proposals for inclusive design to "meet the needs of all regardless of ability, age, gender, ethnicity or economic circumstances" and the commitment to "lifetime neighbourhoods" able to adapt as lifestyles change. Both are particularly important for development in small settlements where the range of housing available to local people is likely to be more limited than in urban environments. I welcome the commitment to "local distinctiveness" and, as argued above, this should mean it is in keeping with the historic feel of local areas and historic building styles and materials. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Fortannia Ltd |
| **Comment ID** | 19741217/2327 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | **Qu. 4 High Quality Design and Health Impact Assessments (HIAs). Do you have any Comments on the additional emphasis on inclusive design and ensuring health and wellbeing objectives for the combined High-quality Design and Health Impact Assessments Policy?**<br><br>Should such a Design Policy be moved forward it is essential for inclusive living that development is set within a high quality, planned environment. Opportunities should be taken to offer development that is set within natural rural environments.<br><br>Whilst the principles support the delivery of lifetime neighbourhoods, it is sensible for the Plan to consider and refer to the delivery of lifetime homes. One such example are bungalows. Perhaps it would be sensible for the Local Plan to encourage such development through a specific helpful Policy which encourages this form of home and could result in the freeing up of conventional 2 (or more storey) homes to meet the requirements of larger families. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Redrow Homes South West, Julia Wallington, Debra Turner, Andrew Williams, Chr... |
| **Comment ID** | 20167105/2348 |
| **Document Part Name** | Question 04 - High Quality Design and Health Impact Assessments (HIAs) |
| **Comment** | 8.30 We support this approach and agree that High Quality Design should be linked to health and wellbeing objectives. A key part of achieving these objectives relates to how the NLP develops its Spatial Strategy, if too much development is located where walking and cycling are not credible options then the overall Policy aim will clearly be undermined.<br><br>8.31 This emphasises the need to place development in locations where sustainable and active modes of travel to everyday facilities and employment opportunities are easily available and the distances involved are achievable for a range of demographics. Land North of Iron Acton Way already has a plethora of everyday facilities and opportunities for access to recreational areas and any forthcoming masterplan will include adequate requirements for public open space provision. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Margaret Pinder - Sustainable Thornbury |
| **Comment ID** | 19372321/59 |
| **Document Part Name** | Question 05 - Development in the Green Belt |
| **Comment** | We agree with the proposal to introduce an additional criterion in order to make clear what is permissible both for householders and Planners. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Jodie Bailey - Pucklechurch Parish Council |
| **Comment ID** | 1061057/97 |
| **Document Part Name** | Question 05 - Development in the Green Belt |

| | |
|---|---|
| **Comment** | Yes - This should be more clearly expressed. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Thompson |
| **Comment ID** | 17795873/168 |
| **Document Part Name** | Question 05 - Development in the Green Belt |
| **Comment** | No. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Carolyn Baker |
| **Comment ID** | 17252193/209 |
| **Document Part Name** | Question 05 - Development in the Green Belt |
| **Comment** | Any changes that tighten the rules on building on the Green Belt must be encouraged as all too often stables become houses as do agricultural buildings and gradually the rural area is built upon. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Gillian Sanders - Wessex Water |
| **Comment ID** | 19455361/235 |
| **Document Part Name** | Question 05 - Development in the Green Belt |
| **Comment** | We would note that all options being considered by this Consultation could give rise to the need to develop existing operational waste water sites and assets within the Green Belt. We would welcome recognition and Policy support within the Local Plan that development of essential water supply or sewage treatment infrastructure within the Green Belt is necessary to support the growth identified in the Local Plan. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Helen Johnstone - Stroud District Council |
| **Comment ID** | 14317537/253 |
| **Document Part Name** | Question 05 - Development in the Green Belt |
| **Comment** | 1. Support the introduction of an additional criterion on ancillary buildings in the Green Belt clarifying the local circumstances where development would be considered sustainable and therefore acceptable in accordance with Planning Policy. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Lesley Brown |
| **Comment ID** | 16384673/294 |
| **Document Part Name** | Question 05 - Development in the Green Belt |
| **Comment** | This could lead to very densely built areas. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Claire Young |
| **Comment ID** | 916289/339 |
| **Document Part Name** | Question 05 - Development in the Green Belt |
| **Comment** | Representing a rural area, I am frequently contacted by residents wanting to convert ancillary buildings to residential use, often for family members. This has potential benefits, such as enabling extended families to live on one site, sharing caring responsibilities between the generations, and providing for local housing need. It is important to ensure that such re-development does not impact negatively on the openness of the Green Belt. I would welcome greater clarity for all parties and a positive approach. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tristan Clark |
| **Comment ID** | 19194177/359 |
| **Document Part Name** | Question 05 - Development in the Green Belt |

| | |
|---|---|
| **Comment** | Any additional criterion on ancillary buildings in the Green Belt should explicitly state that the property owner is forbidden from converting any permitted ancillary buildings into one or more stand-alone residences at a later date except in highly exceptional circumstances. This is necessary because Planning Applicants can exploit Permission to construct ancillary buildings by seeking to convert them into one or more stand-alone residences at a later date. Ancillary buildings *must not* be allowed to function as a loophole through which property owners can build residences in the Green Belt by the backdoor, *especially* when they would not have been Approved if they had been submitted in the conventional manner. The Local Authority should be alert to underhanded attempts to bypass Planning Regulations through seemingly piecemeal Planning Applications spread over a period of years. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Simmons - Westerleigh Parish Council |
| **Comment ID** | 17221409/405 |
| **Document Part Name** | Question 05 - Development in the Green Belt |
| **Comment** | **5B. Development in the Green Belt:**<br><br>**Do you have any views on the introduction of an additional criterion on ancillary buildings in the Green Belt?**<br><br>**WPC believe that Planning Regulations should be robust for any and all Green Belt development and include clear restrictions on the use, and change of use, over time of ancillary buildings or new buildings.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alveston, Rudgeway, and Earthcott Parish Council |
| **Comment ID** | 19784545/436 |
| **Document Part Name** | Question 05 - Development in the Green Belt |
| **Comment** | **That's a good idea and should bring about consistent Planning Decisions, an example being the length of time the building has been in existence prior to change of use.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Donna Ford - Iron Acton Parish Council |
| **Comment ID** | 1060385/464 |
| **Document Part Name** | Question 05 - Development in the Green Belt |
| **Comment** | **Development in the Green Belt:**<br><br>Iron Acton Parish Council agrees that clearer guidance on Development Control Decisions dealing with Applications for ancillary buildings in the Green Belt would be desirable.<br><br>As set out above, the Parish Council also takes the view that greater clarity would be highly desirable on the justification for proposals for strategic development in the Green Belt contained in Draft Strategic Plans and Local Plans! |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | J. Bond |
| **Comment ID** | 17779105/476 |
| **Document Part Name** | Question 05 - Development in the Green Belt |
| **Comment** | Ancillary Buildings in the Green Belt:<br><br>The proposed Policy does not say if it includes or excludes Garages, Garden Sheds, Greenhouses or Polytunnels.<br><br>Some of these encourage the growing of food for one's own use.<br><br>I accept the need for greater regulation in Conservation Areas. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alan Jones - Hanham District Green Belt Conservation Society |
| **Comment ID** | 17236353/508 |
| **Document Part Name** | Question 05 - Development in the Green Belt |

| | |
|---|---|
| **Comment** | Ancillary Buildings:<br><br>* We have read and understand the contents of PSP7 and CS5 regarding the preservation and management of the Green Belt, and are confused by the introduction of the additional criteria on Ancillary Buildings. We have no knowledge of the numbers of Applications that are submitted where any Ancillary Buildings are planned in the Green Belt, but cannot imagine that there are many annually.<br><br>* Our problem is that there is no clear definition of 'Ancillary buildings' within the Document. Presumably, there must be a 'principal' building for the necessity for an ancillary - how are they linked, what function does the Ancillary Building need to add to the principal building, to be permitted in the Green Belt??<br><br>* The danger for our Society is that this is a 'back-door' for the small-scale development of Green Belt areas. These fears can only be allayed by a clear, detailed description that would enable public Comment.<br><br>Green Belt Generally:<br><br>* We would like to remind the Inspector of Appendix 3 to the Plan. The Appendix states, amongst other benefits of the Green Belt, that '……. Green Belt adjacent to the urban edges of Bristol, and surrounding rural settlements close to the urban edge, has a particularly important role in preventing sprawl of the urban edge and merger' - EXACTLY what these areas if developed, would enable!!!!<br><br>* It can only be a short-term solution to dismiss the criteria that has so far protected the Green Belt areas. The benefit of these areas for recreational activities have been known for sometime, but increasingly in a busy pressurised world, the advantages gained in 'mindfulness' from the casual view of open countryside, walking or driving through these areas is being advocated in countering Depression, etc.<br><br>Once destroyed, these areas will be gone forever. |
| **Attached documents** | Hanham District Green Belt Conservation Society (Alan Jones).pdf (20.3 MB) |

| | |
|---|---|
| **Respondent Name** | Roy Crew |
| **Comment ID** | 3973121/533 |
| **Document Part Name** | Question 05 - Development in the Green Belt |
| **Comment** | My Responses to the specific Local Plan Questions:<br><br>Question 5:<br><br>Do not understand what an Ancillary Building is. I can not see the difference between that and any other building and should not be built in the Green Belt. Once you start to encroach into the Green Belt there will be a gradual bibbling away until it is all gone! |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Cate Davidson - Emersons Green Town Council |
| **Comment ID** | 12292641/550 |
| **Document Part Name** | Question 05 - Development in the Green Belt |
| **Comment** | Good afternoon Planning Team,<br><br>Emersons Green Town Council considered the Local Plan (Non-Strategic) at its Full Council meeting on 12th April. The Council responds as follows:<br><br>"Green Belt Land should be protected wherever possible." |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Zoe Hancock - Bristol Avon Catchment Partnership |
| **Comment ID** | 19832225/680 |
| **Document Part Name** | Question 05 - Development in the Green Belt |
| **Comment** | No additional Comments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Heather Elgar - West of England Nature Partnership |
| **Comment ID** | 19839553/792 |
| **Document Part Name** | Question 05 - Development in the Green Belt |
| **Comment** | Please find below Comments from the West of England Nature Partnership (WENP) in response to the South Gloucestershire Local Plan Consultation.<br><br>For transparency, please know that Dominic Mellon (Consultant in Public Health for South Gloucestershire Council) sits on the WENP Board and thus note a declared conflict of interests. This Response reflects the aims and objectives of the Partnership and does not reflect views of individual Board members.<br><br>Question 5: Development in the Green Belt:<br><br>No Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Cate Davidson - Sodbury Town Council |
| **Comment ID** | 4877793/1012 |
| **Document Part Name** | Question 05 - Development in the Green Belt |
| **Comment** | Dear Planning Team,<br><br>Sodbury Town Council responds as follows to the Local Plan (non strategic) Consultation:<br><br>Q. 5 STC feels that an additional criteria should be set in the "any decision re: intended re-use of a building should go through a full<br>Committee process and not be delegated to Officers."<br><br>Please note the Comments as appropriate. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | D. I. Watson |
| **Comment ID** | 19844929/1048 |
| **Document Part Name** | Question 05 - Development in the Green Belt |
| **Comment** | The Document talks about Green Belt Building issues. The current S. Glos Policy of using the 1948 house size means that extended older properties are penalised against new properties that have been built after this time. People's housing requirements some 70 years ago bear no comparison to what is the expected norm today. This 1948 requirement is unfair and should be scrapped. Every Application should be judged on its own merits. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Emma Powell - Redrow Homes Limited |
| **Comment ID** | 19737921/1152 |
| **Document Part Name** | Question 05 - Development in the Green Belt |
| **Comment** | Part 3 - Policy Discussion Points:<br><br>Section 3 of the Local Plan Consultation sets out the titles of proposed Strategic Polices that will be included in the next version of the Local Plan. As such we do not have any Comments on the titles, but reserve our position to Comment on the detailed wording at the next Consultation. All Policies will need to be prepared in the context of the emerging NPPF, a final version is expected to published in the next few Months. The Strategic Policies will also need to reflect any changes to the West of England JSP as it progresses through the Examination towards adoption anticipated later in 2019.<br><br>**Question 5:**<br><br>**B. Development in the Green Belt**<br><br>**Do you have any views on the introduction of an additional criterion on ancillary buildings in the Green Belt?** |
| **Attached documents** | |

| | |
|---|---|
| | No Comments. |
| **Attached documents** | Redrow Homes Limited (Emma Powell) - Pegasus Group (Mrs. Sarah Hamilton-Foyn).pdf (34.1 MB) |

| | |
|---|---|
| **Respondent Name** | IM Land Ltd and The Davison Family |
| **Comment ID** | 19925889/1291 |
| **Document Part Name** | Question 05 - Development in the Green Belt |
| **Comment** | Please see enclosed Representations Report on behalf of IM Land Ltd and The Davison Family prepared by Peter Brett Associates dated 30th April 2018. |
| **Attached documents** | IM Land Ltd and The Davison Family - Peter Brett Associates (Mr. Colin Danks).pdf (673 KB) |

| | |
|---|---|
| **Respondent Name** | Jeremy White |
| **Comment ID** | 19936257/1509 |
| **Document Part Name** | Question 05 - Development in the Green Belt |
| **Comment** | I am opposed to the development of Green Belt areas as I believe erosion will substantially alter the character and beauty of the Hanham Hills and surrounding areas. The Hanham Conservation Area and Green Belt land should be conserved and afforded protection for future generations to enjoy. Many people currently do so. Long may this continue. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Gareth Shehean |
| **Comment ID** | 19936929/1513 |
| **Document Part Name** | Question 05 - Development in the Green Belt |
| **Comment** | Dear Sir/Madam,<br><br>I wish to make clear an opinion on developing Green Belt Land In Hanham.<br><br>I am completely opposed to any proposed development of Green Belt land in this area. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Berni O'Mahony |
| **Comment ID** | 10194497/1533 |
| **Document Part Name** | Question 05 - Development in the Green Belt |
| **Comment** | Question 5:<br><br>Whilst I appreciate that the Council may wish to reduce workload by introducing more rules-based decisions, the additional criterion is vague so I object because it reads that dwellings could be built in the Green Belt. Generally such criterion as proximity to the main building isn't a great guide as the overall impact needs to be individually assessed. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hannah Saunders - Dodington Parish Council |
| **Comment ID** | 19931969/1611 |
| **Document Part Name** | Question 05 - Development in the Green Belt |
| **Comment** | **COMMENTS:**<br><br>Members of Dodington Parish Council agree strongly that there should be the introduction of an additional criterion on ancillary buildings in the Green Belt.<br><br>Areas that Members feel should be considered within this include:-<br><br>o Condition that building HAS to remain as an ancillary building to the main dwelling.<br><br>o It CAN NOT be sold as a separate property or rented out on a permanent basis. |

| | |
|---|---|
| | o If it is going to be a holiday let then x no. of nights use/year needs to be conditioned.<br><br>o The property can't be divided in any way.<br><br>o The parking provisions should be adequate for main dwelling and ancillary building.<br><br>o Footprint of ancillary building is important (it can't be more than x% of main building or if it is a barn that is being converted – has to be same footprint give or take…..). |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | E. H. Schubert Will Trust |
| **Comment ID** | 12403425/1678 |
| **Document Part Name** | Question 05 - Development in the Green Belt |
| **Comment** | Any amendment to Policy should align with Government Guidance – noting the recent publication of the Draft NPPF. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Frampton Cotterell Parish Council |
| **Comment ID** | 20175105/1695 |
| **Document Part Name** | Question 05 - Development in the Green Belt |
| **Comment** | Frampton Cotterell Parish Council is in favour of farm buildings being converted except where there is a need for agricultural use. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | G. E. Forward |
| **Comment ID** | 20176577/1713 |
| **Document Part Name** | Question 05 - Development in the Green Belt |
| **Comment** | This definition suggests the equivalent of a house.  Is this a back door route to buildings in the Green Belt? |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hydrock Consultants Ltd and Mojo Active Ltd |
| **Comment ID** | 19740577/1792 |
| **Document Part Name** | Question 05 - Development in the Green Belt |
| **Comment** | Part 3 - Policy Discussion Points<br><br>B. Development in the Green Belt (Page 77):<br><br>As set out above, we consider that Over Court Farm should be removed from the Green Belt. In the event that the Council does not agree, we would request that greater clarity and certainty is provided to allow for Hydrock and Mojo to optimise the use of Over Court Farm and Tall Trees, in line with the revised Draft NPPF.<br><br>**Recommended Amendments:**<br><br>Based on the above justification, we consider that the Over Court Farm site, including Over Court Barns, land used by Mojo and Tall Trees should be excluded from Green Belt designation. If, in the Council's opinion, this is not considered achievable, we would request that Over Court Farm and Tall Trees are identified as an 'employment and leisure site within the Green Belt' with the following addition to the wording of Policy PSP7:<br><br>**Employment and leisure sites in the Green Belt**<br><br>**Proposals for new buildings and extensions on sites identified for employment and leisure use in the Green Belt will be accepted where it is demonstrated that:**<br><br>**i) New floorspace is solely for or directly related to new employment and/or leisure floorspace;**<br><br>**ii) The proposal complies with other Planning Policies in the Development Plan.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | JFG Gunnery |
| **Comment ID** | 19741793/1979 |
| **Document Part Name** | Question 05 - Development in the Green Belt |
| **Comment** | From the information presented in the Emerging SGLP it is not possible to provide a helpful answer. Is the Policy restricting or adding flexibility to new ancillary buildings? Any amendment to Policy should be reasonable and positive not conflict with Government Guidance – noting the recent publication of the Draft Revised NPPF. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Paul Davis - Persimmon Homes Severn Valley |
| **Comment ID** | 3553569/2143 |
| **Document Part Name** | Question 05 - Development in the Green Belt |
| **Comment** | Question 5 – Development in the Green Belt:<br><br>8.3 If the Council are considering the introduction of additional Policy guidance for Ancillary Buildings in the Green Belt, it should start from the NPPF 89 Policy Framework that Local Planning Authorities should regard the construction of new dwellings as inappropriate in the Green Belt. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Fortannia Ltd |
| **Comment ID** | 19741217/2328 |
| **Document Part Name** | Question 05 - Development in the Green Belt |
| **Comment** | **Qu.5 B Development in the Green Belt. Do you have any views on the introduction of an additional criterion on ancillary buildings in the Green Belt?**<br><br>From the information presented in the Emerging SGLP it is not possible to provide a helpful answer at this time. Is the Policy restricting or adding flexibility to new ancillary buildings? Any amendment to Policy should be reasonable and positive not conflict with Government Guidance – noting the recent publication of the Draft Revised NPPF. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Martin Swinburne |
| **Comment ID** | 10327617/53 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | I support the reassessment of the nominated local Green Spaces. In the light of the proposed additional housing in Yate there should be a review of whether areas such as Engine Common should be protected as an amenity for North Yate residents. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Margaret Pinder - Sustainable Thornbury |
| **Comment ID** | 19372321/60 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | We agree that Neighbourhood Plans, where they exist, should be able to designate Local Green Spaces. We would also like to support the Applications for Local Green Space designations for Vilner Woodland (Thornbury Community Composting) and Filnore Woods (Friends of Filnore Woods) to have Local Green Space designation. These areas are much used by local people, close to the centre of the town and provide habitat for many species. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Jodie Bailey - Pucklechurch Parish Council |
| **Comment ID** | 1061057/99 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | Yes we agree with the Inspector and the proposals above. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Martin Gillian |
| **Comment ID** | 19445537/149 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |

| | |
|---|---|
| **Comment** | Regarding Designated Green Spaces. It is important to recognise that land that does not have direct public access, and can still be viewed as an important Green Space. For example a collection of residential gardens containing wildlife habitat and or trees can be; an important landscape marker; an important view from outside a village; or an important wildlife habitat. The current Interactive Map shows a distinct lack of designated Green Space within Marshfield (local village), and whilst I appreciate it may be the Policy to re-assess all areas, as stated in your PSP4 notes above, there does not appear to be any formal structure for local input to this discussion except via this Consultation. I will email separately with a more detailed discussion of this point. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Lyn Haigh - Rangeworthy Parish Council |
| **Comment ID** | 2301601/187 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | The link provided just takes one to the start of this Document and I could not find anything about Green Spaces. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Lyn Haigh - Rangeworthy Parish Council |
| **Comment ID** | 2301601/190 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | Further to my previous Comment, I have managed to find the Document listing those sites which were excluded from the PSP Submission and will be reassessed. South Gloucestershire Council is in a different position to any other landowner because it controls the designation process and should therefore identify itself as the owner, where applicable, in the interests of transparency. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Philip Box |
| **Comment ID** | 19453025/199 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | Designated local Green Spaces should include more extensive consideration of their impacts on Biodiversity, and their potential value to enhance and preserve it. This comes in context of the Government's aim to arrest the significant decline in UK species, in line with the UN Convention on Biodiversity, the UK's Biodiversity Action Plan and 25 Year Plan for nature. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tamzen Bury |
| **Comment ID** | 19416385/217 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | I don’t believe green spaces should be used to build new houses for environmental and protection of wildlife. Where a green space is near to houses already, people would have paid a premium to live there. Children are able to play in the streets or on the local fields, and people including the elderly are able to walk dogs on them safely, all which should be encouraged. It impacts people’s quality of life and their mental health if you take away something they enjoyed. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Gillian Sanders - Wessex Water |
| **Comment ID** | 19455361/236 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | Whilst we support the designation and creation of multifunctional Green Spaces, we are concerned by the broad nature of the development exclusion created by this Policy, especially in light of our obligations as a statutory undertaker. We would request that consideration is given to including a further exception covering essential infrastructure development by statutory undertakers, provided works are located and designed so that any adverse impact on the Local Green Space is minimised, mitigated or avoided.<br><br>We consider that the process of re-assessment or re-designation of Green Spaces should have regard to the West of England Nature Partnership’s Habitat Opportunity Mapping and related principles. This should help to ensure that such Green Spaces achieve multiple environmental benefits. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Helen Johnstone - Stroud District Council |
| **Comment ID** | 14317537/254 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |

| | |
|---|---|
| **Comment** | 1. Support the designation of Local Green Spaces through the production of Neighbourhood Plans. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Claire Young |
| **Comment ID** | 916289/340 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | I am concerned about consideration of entirely new sites for Local Green Space designation having to come forward through Neighbourhood Plans. This is a challenging process for any community to undertake and needs greater support from South Gloucestershire Council than has been provided to date. Communities are unlikely to embark on one simply to protect a Green Space, they are only likely to do so if there are other reasons for bringing forward a Neighbourhood Plan. I think that future Reviews of the Local Plan should be an opportunity for new Spaces to be considered. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Simmons - Westerleigh Parish Council |
| **Comment ID** | 17221409/406 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **6C. Designated Local Green Spaces:**<br><br>**Do you have any views on the above discussion points in relation to Designated Local Green Spaces?**<br><br>**WPC has Designated Local Green Spaces and some which need to be considered still. Several of these are within the Green Belt. All such spaces should be very carefully considered in discussions on transport and development as stated in the Policy.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alveston, Rudgeway, and Earthcott Parish Council |
| **Comment ID** | 19784545/437 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **No** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Donna Ford - Iron Acton Parish Council |
| **Comment ID** | 1060385/465 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **Designated Local Green Spaces:**<br><br>Iron Acton Parish Council welcomes these proposals and the opportunities they would provide for reconsideration of previous decisions not to designate particular sites as Local Green Spaces (where these have particular local value such as historical importance, ecological value, or history of free public access, etc), and for nomination of new sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christine Hunter |
| **Comment ID** | 19809025/490 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **Designated Local Green Spaces:**<br><br>I agree with the proposals for the reconsideration of previous decisions not to designate particular sites as Local Green Spaces (where these have particular local value such as historical importance, ecological value, or history of free public access, etc), and for inviting nomination of new sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alan Jones - Hanham District Green Belt Conservation Society |
| **Comment ID** | 17236353/509 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |

| | |
|---|---|
| **Comment** | As a Group, we do not have any faith in the procedure for adoption of Local Green Spaces onto the Register and the protection that this affords.<br><br>The Cricket Ground in Abbots Road, Hanham was excluded from the Schedule, by SGC Planning Department, despite not being nominated as a development site by the owners and a 1,200 signature Petition supporting retention of the ground as an open space.<br><br>Conversely, Gover Road is included on the Schedule but is now at risk of potential housing development, as it is included in the 'Call for Sites' Document.<br><br>This section in the Local Plan refers to 'Transport Investment' - we would be very interested to know the location and scope of these proposals. |
| **Attached documents** | Hanham District Green Belt Conservation Society (Alan Jones).pdf (20.3 MB) |

| | |
|---|---|
| **Respondent Name** | Roy Crew |
| **Comment ID** | 3973121/535 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | My Responses to the specific Local Plan Questions:<br><br>Question 6:<br><br>In Hanham, the Green Belt areas, Gover Road Park and the Abbots Road Cricket Field should be designated green spaces. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Toby Wenham - LaSalle Investment Management |
| **Comment ID** | 19809377/549 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | LaSalle objects to the Council's proposal to designate Eagle Meadow as 'Local Green Space' in its New Local Plan. The proposed boundary of the Local Green Space encroaches onto the Northern boundary of Patchway Trading Estate and is drawn tightly around the existing industrial/ warehouse units at Nos. 6 & 7 and 8. If designated, the Local Green Space would restrict any small-scale alterations and extensions to the units that could otherwise be implemented through the Permitted Development Rights and, in the short term, could reduce the scope of these units to adapt to the changing requirements of existing and future industrial occupiers. The Local Green Space would also constrain the developable area in the medium-long term, while LaSalle progresses its strategy to achieve the Council's Vision for the wider CPNN, as reinforced through the New Local Plan. As such, LaSalle requests that Eagle Meadow is not designated as Local Green Space in the New Local Plan. |
| **Attached documents** | LaSalle Investment Management (Mr. Toby Wenham) - JLL (Mr. Alex Rogerson).pdf (209 KB) |

| | |
|---|---|
| **Respondent Name** | Paul Chapman - Iron Acton Parish Council |
| **Comment ID** | 19809537/556 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **Designated Local Green Spaces:**<br><br>I agree with the proposals for the reconsideration of previous decisions not to designate particular sites as Local Green Spaces(where these have particular local value such as historical importance, ecological value, or history of free public access, etc), and for inviting nomination of new sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David Hatherell |
| **Comment ID** | 19830849/571 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **Designated Local Green Spaces:**<br><br>I agree with the proposals for the reconsideration of previous decisions not to designate particular sites as Local Green Spaces (where these have particular local value such as historical importance, ecological value, or history of free public access, etc), and for inviting nomination of new sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | John O'Donnell |
| **Comment ID** | 18604385/582 |

| | |
|---|---|
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **Designated Local Green Spaces:**<br><br>I agree with the proposals for the reconsideration of previous decisions not to designate particular sites as Local Green Spaces (where these have particular local value such as historical importance, ecological value, or history of free public access, etc), and for inviting nomination of new sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Joseph Hatherell |
| **Comment ID** | 19831681/593 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **Designated Local Green Spaces:**<br><br>I agree with the proposals for the reconsideration of previous decisions not to designate particular sites as Local Green Spaces (where these have particular local value such as historical importance, ecological value, or history of free public access, etc), and for inviting nomination of new sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Karen Longden |
| **Comment ID** | 19831809/614 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **Designated Local Green Spaces:**<br><br>I agree with the proposals for the reconsideration of previous decisions not to designate particular sites as Local Green Spaces (where these have particular local value such as historical importance, ecological value, or history of free public access, etc), and for inviting nomination of new sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Jane Driver |
| **Comment ID** | 5134785/626 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **Designated Local Green Spaces:**<br><br>I agree with the proposals for the reconsideration of previous decisions not to designate particular sites as Local Green Spaces (where these have particular local value such as historical importance, ecological value, or history of free public access, etc), and for inviting nomination of new sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Diana Porter-Smith |
| **Comment ID** | 10874433/637 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **Designated Local Green Spaces:**<br><br>I agree with the proposals for the reconsideration of previous decisions not to designate particular sites as Local Green Spaces (where these have particular local value such as historical importance, ecological value, or history of free public access, etc), and for inviting nomination of new sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Michael Keenan |
| **Comment ID** | 2796353/649 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **Designated Local Green Spaces:**<br><br>I agree with the proposals for the reconsideration of previous decisions not to designate particular sites as Local Green Spaces (where these have particular local value such as historical importance, ecological value, or history of free public access, etc), and for inviting nomination of new sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Welbeck Strategic Land LLP |
| **Comment ID** | 19840833/658 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | C. RESPONSE TO THE QUESTIONS<br><br>15. In the interest of brevity and succinctness, this Section only responds to the Questions of relevance to the current proposals for Cleve Park.<br><br>Question 6 - Designated Local Green Spaces:<br><br>19. We consider that entirely new spaces which have not been previously assessed through the preparation of the Policies, Sites and Places Plan should be appropriately considered by communities through the production of Neighbourhood Plans.<br><br>20. The site at Cleve Park has the potential to provide a new public open space of approximately 8.5 ha to the South of the site called Viewpoint Park. This open green space would include informal recreational open space, natural and semi-natural green space, provision for children and young people, open sports provision and allotments.<br><br>21. As stated in the Policies, Sites and Places Plan in Policy PSP4 (Designated Local Green Space), Designated Local Green Spaces are spaces which are of particular importance to communities that rules out new development.<br><br>22. The public open space to the South of the site will provide a destination - Viewpoint Park - for residents of Cleve Park and the local community. The park will include formal and informal paths connecting to the existing public footpath network, as well as seating provision.<br><br>23. Viewpoint Park will be open in nature with an emphasis upon the creation of wildflower meadows; will allow views over the Severn Estuary towards the Forest of Dean, the Wye Valley and parts of South Wales, as well as benefiting views from the nearby Grovesend Road.<br><br>24. It is considered that Viewpoint Park has the potential to become an important area of Local Green Space within Thornbury, however this public open space cannot come to fruition without the redevelopment of the rest of the site for residential purposes, as per the Planning Application proposal currently at appeal (Ref. APP/P0119/W/17/3182296).<br><br>25. There is significant and growing evidence that access to good quality green open space is associated with a range of positive health outcomes. South Gloucestershire Council should be encouraging, not only the protection of existing open spaces, but also assisting in the creation of new areas of green open space to improve access for all communities (Local Action on Health Inequalities: Improving Access to Green Spaces 2014). A key example of this is Viewpoint Park at Cleve Park, Thornbury. |
| **Attached documents** | Welbeck Strategic Land LLP - Dominic Lawson Bespoke Planning (Harriet Swale).pdf (1.4 MB) |

| | |
|---|---|
| **Respondent Name** | Richard Hunter |
| **Comment ID** | 12513441/664 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **Designated Local Green Spaces:**<br><br>I agree with the proposals for the reconsideration of previous decisions not to designate particular sites as Local Green Spaces (where these have particular local value such as historical importance, ecological value, or history of free public access, etc), and for inviting nomination of new sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Zoe Hancock - Bristol Avon Catchment Partnership |
| **Comment ID** | 19832225/681 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | Whilst we support the designation and creation of multifunctional green spaces, we are concerned by the broad nature of the development exclusion created by this Policy. The BACP is keen for the West of England to adopt a strong Green Infrastructure Plan, this should help to ensure that such Green Spaces achieve multiple environmental benefits. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Rosemary White |
| **Comment ID** | 10707009/698 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |

| | |
|---|---|
| **Comment** | Designated Local Green Spaces:<br><br>I agree with the proposals for the reconsideration of previous decisions not to designate particular sites as Local Green Spaces (where these have particular local value such as historical importance, ecological value, or history of free public access, etc), and for inviting the nomination of new sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Purchase |
| **Comment ID** | 2804385/709 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **Designated Local Green Spaces:**<br><br>I agree with the proposals for the reconsideration of previous decisions not to designate particular sites as Local Green Spaces (where these have particular local value such as historical importance, ecological value, or history of free public access, etc), and for inviting nomination of new sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Suzanna Keenan |
| **Comment ID** | 17805057/752 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **Designated Local Green Spaces:**<br><br>I agree with the proposals for the reconsideration of previous decisions not to designate particular sites as Local Green Spaces (where these have particular local value such as historical importance, ecological value, or history of free public access, etc), and for inviting nomination of new sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Simon Whittard |
| **Comment ID** | 12489153/764 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **Designated Local Green Spaces:**<br><br>I agree with the proposals for the reconsideration of previous decisions not to designate particular sites as Local Green Spaces (where these have particular local value such as historical importance, ecological value, or history of free public access, etc), and for inviting nomination of new sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Heather Elgar - West of England Nature Partnership |
| **Comment ID** | 19839553/793 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | Please find below Comments from the West of England Nature Partnership (WENP) in response to the South Gloucestershire Local Plan Consultation.<br><br>For transparency, please know that Dominic Mellon (Consultant in Public Health for South Gloucestershire Council) sits on the WENP Board and thus note a declared conflict of interests. This Response reflects the aims and objectives of the Partnership and does not reflect views of individual Board members.<br><br>Question 6: Designated Local Green Spaces:<br><br>WENP strongly supports the designation and creation of multifunctional green spaces, and acknowledges that such designations should be periodically reviewed to ensure that, overall, land is designated in the most strategic way. WENP recommends that this review happens as part of, or alongside, the West of England Green Infrastructure Plan to ensure that land does not become locked in for development which could more valuably form part of a strategic and resilient Green Infrastructure Network that benefits both people and nature.<br><br>In the same way that green spaces should be reassessed alongside planned development and associated infrastructure, such development and associated infrastructure should also be developed in respect of our strategic green infrastructure. |

| | |
|---|---|
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Robert and Diana Pardoe |
| **Comment ID** | 10784545/811 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **Designated Local Green Spaces:**<br><br>I agree with the proposals for the reconsideration of previous decisions not to designate particular sites as Local Green Spaces (where these have particular local value such as historical importance, ecological value, or history of free public access, etc), and for inviting nomination of new sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Brian Hackland |
| **Comment ID** | 8354337/828 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **Designated Local Green Spaces:**<br><br>Iron Acton Parish has a number of important historic sites which currently have little or no protection. I agree with the proposals for the reconsideration of previous decisions not to designate particular sites as Local Green Spaces (where these have high local value such as historical importance, ecological significance, or history of free public access, etc), and for inviting nomination of new sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anna Webster |
| **Comment ID** | 19843617/839 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **Designated Local Green Spaces:**<br><br>I agree with the proposals for the reconsideration of previous decisions not to designate particular sites as Local Green Spaces (where these have particular local value such as historical importance, ecological value, or history of free public access, etc), and for inviting nomination of new sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Victoria & John Vlietstra |
| **Comment ID** | 19843937/850 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **Designated Local Green Spaces:**<br><br>We agree with the proposals for the reconsideration of previous decisions not to designate particular sites as Local Green Spaces (where these have particular local value such as historical importance, ecological value, or history of free public access, etc), and for inviting nomination of new sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christina Fussell |
| **Comment ID** | 19843969/861 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **Designated Local Green Spaces:**<br><br>I agree with the proposals for the reconsideration of previous decisions not to designate particular sites as Local Green Spaces (where these have particular local value such as historical importance, ecological value, or history of free public access, etc), and for inviting nomination of new sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Paul Fussell |
| **Comment ID** | 19844001/872 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |

| | |
|---|---|
| **Comment** | **Designated Local Green Spaces:**<br><br>I agree with the proposals for the reconsideration of previous decisions not to designate particular sites as Local Green Spaces (where these have particular local value such as historical importance, ecological value, or history of free public access, etc), and for inviting nomination of new sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Oliver Fussell |
| **Comment ID** | 10784449/884 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **Designated Local Green Spaces:**<br><br>I agree with the proposals for the reconsideration of previous decisions not to designate particular sites as Local Green Spaces (where these have particular local value such as historical importance, ecological value, or history of free public access, etc), and for inviting nomination of new sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tom Barnes |
| **Comment ID** | 19844673/895 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **Designated Local Green Spaces:**<br><br>I agree with the proposals for the reconsideration of previous decisions not to designate particular sites as Local Green Spaces (where these have particular local value such as historical importance, ecological value, or history of free public access, etc), and for inviting nomination of new sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Peter Barker - Latteridge Road Community Group |
| **Comment ID** | 6622945/940 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **Designated Local Green Spaces:**<br><br>I agree with the proposals for the reconsideration of previous decisions not to designate particular sites as Local Green Spaces (where these have particular local value such as historical importance, ecological value, or history of free public access, etc), and for inviting nomination of new sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kate Edmonds |
| **Comment ID** | 19883393/951 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **Designated Local Green Spaces:**<br><br>I agree with the proposals for the reconsideration of previous decisions not to designate particular sites as Local Green Spaces (where these have particular local value such as historical importance, ecological value, or history of free public access, etc), and for inviting nomination of new sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Roger Hutchinson and Adam Monk |
| **Comment ID** | 17348929/966 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | South Gloucestershire Local Plan 2018 – 2036<br><br>Question 6C.  Designated Local Green Spaces. Do you have any views?<br><br>Elm Park, Filton. |

| | |
|---|---|
| | "As we have done previously and in support of the personal Submissions and large Petition submitted we wish to submit that the proposal to designate a 15m buffer down the Northern side of Elm Park, Filton is detrimental to the local environment, would seriously damage much needed local facilities and its requirement is seriously questionable.<br><br>This side of Elm Park contains a number of important exercise and fitness facilities of varied types serving a range of age groups and our multi award winning Community Garden.<br><br>The Garden has matured over the years and has and includes works of art and scientific interest, gardens allocated to local Schools and our twin towns as well as a tree sculpture of an owl, all of which attracts many visitors and all of which is provided by the hard work of volunteers.<br><br>There is a Pétanque area which provides is rented by a local club but free for use by the local community, the club is growing and the terrain is used for club and regional competitions throughout the year.<br><br>Our cycle speedway track is multi functional and is used for cycle training for youngsters with their parents, casual cycling, running etc. In the centre is an open air gym which again is well used by the public.<br><br>There is a very well used play park, there is genuine concern if the A4174 is widened at this point the play park would be extremely close to a major arterial road.<br><br>Towards the bottom of the Park is our BMX/Skateboard Park, an expensive facility when put in and very different to others that have been built since. Very well used by local youth and some from further afield. It is clearly at risk should the land be taken.<br><br>Most of the way down the side of the park it is protected from the A4174 Avon Ring Road by a dense hedgerow and inside that rows of mature trees, the removal of which would be nothing short of environmental vandalism.<br><br>Finally it is difficult to see what use 15m of this valuable open space would be for widening the A4174. More road space for cars would not solve anything given that at rush hours both the junction at Filton Avenue and the Filton roundabout are at saturation point. Widening to the East would require the removal of the Slip Road of Station Road which is protected by a hedgerow down to the railway bridge which clearly can't be widened.<br><br>We therefore submit that the looming threat of a road widening is detrimental to the development of aspects of Elm Park that are very important to the aims of encouraging fitness, better health and reducing the threats of obesity and protecting our environment against deteriorating air quality. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David and Tracey Jones |
| **Comment ID** | 19883585/971 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **Designated Local Green Spaces:**<br><br>I agree with the proposals for the reconsideration of previous decisions not to designate particular sites as Local Green Spaces (where these have particular local value such as historical importance, ecological value, or history of free public access, etc), and for inviting nomination of new sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Eric Heath - Avon Wildlife Trust |
| **Comment ID** | 19883713/997 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | AWT strongly supports the designation and creation of multifunctional green spaces, and acknowledges that such designations should be periodically reviewed to ensure that, overall, land is designated in the most strategic way. AWT recommends that this Review happens as part of, or alongside, the West of England Green Infrastructure Plan to ensure that land does not become locked in for development which could more valuably form part of a strategic and resilient Green Infrastructure Network that benefits both people and nature.<br><br>In the same way that green spaces should be reassessed alongside planned development and associated infrastructure, such development and associated infrastructure should also be developed in respect of our Strategic Green Infrastructure. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Cate Davidson - Sodbury Town Council |
| **Comment ID** | 4877793/1013 |

| | |
|---|---|
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | Dear Planning Team,<br><br>Sodbury Town Council responds as follows to the Local Plan (non strategic) Consultation:<br><br>Q. 6 STC is comfortable with the proposals made in the previous Review. Any potential LGS should be explored when future development is considered.<br><br>Please note the Comments as appropriate. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hannah Spanton - Badminton Estate |
| **Comment ID** | 19884225/1033 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | 6:<br><br>Designated Local Green Spaces And Specific Sites Which Are Proposed for Designation:<br><br>The adopted PSP acknowledges within the Inspector's Report that all designations for Local Green Space should be reviewed at the Plan making process. My Client; the Badminton Estate has been advised that a number of sites within their ownership are being considered as potential Local Green Spaces.<br><br>Full Responses have been provided in relation to specific sites below, but we wish to make the following more general Comments below.<br><br>It should be made clear that the Estate is maintaining an objection to all sites that they have been advised have been nominated: LGSD001 LGSD172, LGSD792, LGSD796, LGSD794, LGSD797 LGSD271, LGSD273, LGSD275, LGSD277, LGSD937, LGSD939 LGSD315, LGSD988, LGSD989, LGSD795.<br><br>It should be made clear that the NPPF at Paragraph 77 states that *"Local Green Space Designations **will not** be appropriate for most green areas or open space."*<br><br>Compelling evidence is required to justify such a designation particularly as the designation of a Local Green Space is a restrictive and significant Policy designation equivalent to that of the Green Belt. Getting it wrong could prevent flexibility for the future use of a site in sustainability terms and could prevent suitable, achievable and available land coming forward for housing or other development in the future in sustainable settlements. The NPPG at Paragraph: 009 Reference ID: 37-009-2014030 which sets out how designating any Local Green Space will need to be consistent with local Planning for sustainable development in the area. In particular, Plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of Plan making.<br><br>In addition, the PPG provides further advice on the size of LGS and the extensive tract of land point: *"Consequently blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name."*<br><br>This raises significant concerns, that the proposed designation of so many Local Green Spaces is actually seeking to constrain and prevent sustainable development, whilst the Consultation Local Plan is looking to allocate development into the rural settlements.<br><br>Not only is the scale of the LGS excessive and contrary to the NPPF and PPG, we also object to the location of the proposed LGS.<br><br>Planning Inspectors have been highly critical of Local Authorities who have sought to apply the LGS designation too extensively in their Local Plans. South Cambridgeshire Local Plan is a recent example and in respect of Policy NH/12 Local Green Space (16 March 2017) The Inspector's Report criticises the approach taken by the Council, stating that:<br><br>*"They have serious concerns that the Council's assessment of the proposed LGS designations has not been carried out with sufficient rigour nor focussed fully on the stringent criteria set out in the Framework which sets a high bar given that LGS sites enjoy the same level of protection as Green Belt land"* (Page 3).<br><br>The Inspector discounted a series of sites on the basis that they were not demonstrably special or valued landscapes and consequently they did not meet the LGS tests. It is clear that South Cambridgeshire District Council (SCDC) sought to apply the designation too widely and included anything from small grass verges in Housing Estates to Allotments and agricultural fields. On the basis of the Inspector's recommendations, SCDC has substantially reduced the number of LGS proposals with only 42% of the original sites remaining as LGS. |

Other Inspectors have taken the view that in order to maximise housing land supply, potential housing sites should not be subject to LGS. This was the approach taken by the Inspector to the South Gloucestershire Council: Policies, Sites and Places Plan that states at Paragraph 25.

*"As indicated above, the criteria have also been formulated to maximise the opportunity for finding housing land in the future given the present shortfall in the five-year supply. Any nominated site which has either known or suggested potential to accommodate housing has been excluded at this stage, to be reviewed through the preparation of the NLP. It is possible that some of these sites might ultimately meet the criteria for LGS designation, and their exclusion does not predetermine their future development. However, the housing land supply situation justifies the precautionary approach."*

While it is appropriate for some LGS to be provided in appropriate locations and as part of housing allocations. The views of the Inspector on South Gloucestershire's LGS proposals are pertinent as it is critical that the provision of LGS does not undermine the prime objective of the Local Plans, which is to facilitate the delivery of housing growth.

The PPG Guidance is also clear that *"If land is already protected by designation, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space"* (Ref: 37-011-20140306).

Within many of the rural areas, there appears to be little justification for the designation of any Local Green Space, this is because much of the area is subject to other designations such as AONB, Conservation Areas, the setting of Listed Buildings or other ecological constraints. Many of the recommendations also appear to be made on the basis of only meeting one of the criteria.

Existing Policy PSP4 already allocates almost 250 areas as Local Green Spaces, which coupled with the Spreadsheet which is proposing over 300 more, appears excessive and outside of the intentions of the NPPF in terms of Local Green Space, which suggests that it is not appropriate for most areas. Given the Comments within the Inspector's Report on the PSP and the move towards delivering housing in rural areas, very careful consideration needs to be given to this criterion prior the allocation of any further areas of LGS.

More specific Comments below are set out in relation to specific sites which the Badminton Estates have been advised by SGC are in their Ownership. There are concerns that the information put forward appears to be predominantly anecdotal.

These Comments are in addition to those previously made on 18th August 2015.

**LGSD001: Acton Turville Playing Fields:**

The site is located within the AONB, which is a national landscape designation and therefore brings its own constraints. There is no known historic significance to the site. The site is not in close proximity to any Listed Buildings or the Acton Turville Conservation Area.

The sole reason for nominating the site as a Local Green Space is due to the recreational value of the site. As the site is an existing playing field it is already protected by existing legislation and specifically Paragraph 74 of the NPPF which states that existing open space, sports and recreational buildings and land, including playing fields should not be built on, unless proposals meet three specific and restrictive criteria. Given a Local Green Space designation should be treated the same as Green Belt, it may actually be the case that the site's designation could prevent additional facilities coming forward on the site if ever required in the future, for example changing room facilities.

**LGSD172: Drovers Pool:**

This is a small tract of land within the AONB, Conservation Area and within the setting of a number of Listed Buildings. It is considered that significant constraints exist in respect of this site already.

**LGSD792: The Pound:**

This is a very small tract of land adjacent to Hunters Mead. It is not specifically understood the importance of this specific piece of land. The site is already the subject of specific protection in respect of its location within the AONB, Conservation Area and within the setting of the neighbouring Listed Buildings.

**LGSD796: Hawkesbury Monument Area:**

This is within the Conversation Area and AONB, there are Listed Buildings on the site and the wall surrounding the site is Listed. It is considered that these represent significant constraints on the site.

**LGSD797: Hawkesbury Common:**

The Spreadsheet which accompanies the Document sets out that the site could not be designated as it comprised an extensive tract of land over 19 hectares which is contrary to national Policy. This is still the case and as such it should be removed from consideration.

The site is subject to a number of other ecological constraints including being identified as good quality semi-improved grassland, lowland meadow and parts of deciduous woodland. These constraints and the fact it is common land are likely to provide significant protection already to the site.

**LGSD794: Hawkesbury and Inglestone Commons:**

The Spreadsheet which accompanies the Document sets out that the site could not be designated as it comprised an extensive tract of land over 19 hectares which is contrary to national Policy. This is still the case and as such it should be removed from consideration. This site coupled with those adjoining it LGSD1207 and 1208 goes far beyond the justification for Local Green Space.

The site is subject to a number of constraints including SSSI, Ancient Woodland and priority species and is common land which provide adequate protection.

**LGSD271: Sodbury Common:**

The Spreadsheet which accompanies the Document sets out that the site could not be designated as it comprised an extensive tract of land over 19 hectares which is contrary to national Policy. This is still the case and as such it should be removed from consideration.

The site is subject to a number of other ecological constraints including being identified as good quality semi-improved grassland. These constraints are likely to provide significant protection already to the site.

**LGSD273: Kingrove Common:**

This site is already in the Green Belt and is identified as a Site of Nature Conservation Importance. Further LGS designation would not give it any additional protection. In addition, the site is considered to be an extensive tract of land and it is not considered to be in reasonably close proximity to the community it serves.

**LGSD275: Allotments off Badminton Road:**

It should be acknowledged that the site's allocation as Allotments provides an existing level of protection. It is felt a Local Green Space designation would potentially prevent development to support the Allotments such as sheds.

**LGSD277: Common Garden Allotments on Trinity Lane:**

It should be acknowledged that the site's allocation as Allotments and as a Site of Nature Conservation Importance provides an existing level of protection. It is felt a Local Green Space designation would potentially prevent development to support the Allotments such as sheds.

When considered cumulatively, this is considered to comprise an extensive tract of land which is not in accordance with the guidance.

**LGSD937: Land Linking Chipping Sodbury and Old Sodbury:**

The scale of the proposed LGS is considered extensive given those proposed in the vicinity, and if the site already proposed common land then existing protections are in place.

**LGSD939: Coombes End Common (Triangular Area where Chapel Lane Joins Catchpott Lane):**

As set out in the accompanying information, it is not clear what reasoning is being put forward. This site is already in the Green Belt and AONB. Further LGS designation would not give it any additional protection.

**LGSD315: Land Adjacent to St. Mary's Church:**

The site is located within the AONB, Conservation Area and also within the setting of the Grade I Listed Church. It is acknowledged that the site is likely to have some historic significance and this is referenced within the Conservation Statement for Tormarton. However, the existing designations on the site give significant protection to the site.

| | |
|---|---|
| | The site is not considered to have any specific recreational value.<br><br>**LGSD988: Fields to the East of Marshfield Road:**<br><br>This appears to suggest that the site has some historical value and is popular for recreation purposes. It should be acknowledged that in Planning terms, no one has a right to a view. The reason given as to why the site could not be designated is because it forms part of a 'Call for Sites' Submission. This is still the case with a new Call for Sites Form submitted and therefore the new Local Plan needs to ensure that the Plan can deliver appropriate housing sites.<br><br>The settlement of Tormarton already has three designations and another five are proposed around the main village. Cumulatively, these are considered to represent extensive tracts of development. Whilst the Policy suggests that any sites under 19 hectares will not be considered as extensive tracts, this needs to be viewed in the context of the settlement in which they surround. Given the need set out above to deliver housing, this should be the priority within the Local Plan.<br><br>**LGSD989: West Littleton Common:**<br><br>This site is located within the AONB, Conservation Area and within the setting of Listed Buildings. The proposal is considered to comprise an extensive tract of land when considered in relation to the surrounding settlement. There are existing protections for the site and it is not considered suitable for LGS.<br><br>**LGSD795 -** It would appear that this site actually refers to Hawkesbury Pound, and the LPA have suggested that it cannot be designated as it is highways land. As a result, the site should be removed from consideration.<br><br>However, as it is not clear which site this specifically refers to and therefore the Estate reserves the right to make further Comment in the future if necessary. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Felicity Harrison |
| **Comment ID** | 4391425/1058 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **Page 78. Designated Green Spaces**<br><br>**3.** Whether entirely new spaces, which have not previously been assessed through the preparation of the PSP Plan would be more appropriately considered by communities through the production of Neighbourhood Plans. Such a Policy would make sense as the local community has a greater understanding of what is and is not important to them than the Council. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Clifton Homes Ltd |
| **Comment ID** | 16617921/1087 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **Please see submitted Representations.** |
| **Attached documents** | Clifton Homes Ltd - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (1.7 MB) |

| | |
|---|---|
| **Respondent Name** | Progold Ltd |
| **Comment ID** | 19737665/1125 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | Please see submitted Representations. |
| **Attached documents** | Progold Ltd - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (7.9 MB) |

| | |
|---|---|
| **Respondent Name** | Susan E. Green - Home Builders Federation (HBF) |
| **Comment ID** | 10761601/1135 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |

| | |
|---|---|
| **Comment** | The Council propose to retain Policy PSP4 and re-assess spaces nominated but not designated in PSPP in accordance with the Inspector's conclusions. The Council should be undertaking a review of both designated and undesignated LGS. In previous Representations to the PSP Plan the HBF objected to the quantum of proposed LGS designations given the Council's lack of 5 YHLS and the potential impact on restricting housing land supply. The HBF's original objections remain unchanged. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Emma Powell - Redrow Homes Limited |
| **Comment ID** | 19737921/1153 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | Part 3 - Policy Discussion Points:<br><br>Section 3 of the Local Plan Consultation sets out the titles of proposed Strategic Polices that will be included in the next version of the Local Plan. As such we do not have any Comments on the titles, but reserve our position to Comment on the detailed wording at the next Consultation. All Policies will need to be prepared in the context of the emerging NPPF, a final version is expected to published in the next few Months. The Strategic Policies will also need to reflect any changes to the West of England JSP as it progresses through the Examination towards adoption anticipated later in 2019.<br><br>**Question 6:**<br><br>**C. Designated Local Green Spaces**<br><br>**Do you have any views on the above discussion points in relation to designated Local Green Spaces?**<br><br>The Council propose to retain Policy PSP4 and re-assess spaces nominated but not designated in PSPP in accordance with the Inspector's conclusions.<br><br>It should be noted that the NPPG is clear that:<br><br>"Designating any Local Green Space will need to be consistent with local Planning for sustainable development in the area. In particular, Plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of Plan making." Paragraph: 007 Reference ID: 37-007-20140306. |
| **Attached documents** | Redrow Homes Limited (Emma Powell) - Pegasus Group (Mrs. Sarah Hamilton-Foyn).pdf (34.1 MB) |

| | |
|---|---|
| **Respondent Name** | Phill Bamford - Gladman Developments Ltd |
| **Comment ID** | 15612065/1179 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | ## 4.2 Question 6 – Designated Local Green Space:<br><br>4.2.1 Any Local Green Space should be compliant with Paragraph 77 of the Framework. The Council should reassess all Local Green Spaces, both existing and proposed, to ensure that they are still consistent with this advice and to ensure that they do not place an unnecessary constraint upon the delivery of housing to fully meet the housing needs of the District. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Claire Good |
| **Comment ID** | 19925569/1262 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | SG82 the Cricket Ground and SG259 Gover Road and Stone Hill View Green Space should be Designated Local Green Spaces. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Gill Penberth - Tormarton Parish Council |
| **Comment ID** | 19943937/1287 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **C. Designated Local Green Spaces – P. 78:** |

| | |
|---|---|
| | In response to SGC's request to nominate Local Green Spaces (LGS) for the PSP Plan, TPC identified 8 areas in Tormarton and one in West Littleton that were considered to qualify for this designation. Of these only three (LGSD314, LGSD317 and LGSD319(part)) were included in the PSP Plan. The nominated sites that were not accepted were refused because there was an objection from the landowner and/or they were included in the *Call for Sites*. This process totally ignores the views of the local residents and TPC welcomes the re-assessment of these nominated sites for inclusion in the Local Plan.<br><br>Seventy-six percent of the residents in the Parish consider the rural location of the villages to be very important and wildlife, unspoilt environment and tranquillity were significant aspects of this Response (Tormarton & West Littleton Parish Plan, 2010). The land immediately bordering the village of Tormarton is important for wildlife since the surrounding farmland is mainly arable and supports a limited range of birds and other species. Thus in one of the nominated LGS (LGSD988) deer, hares, foxes, pheasants, buzzards, kestrels and other birds of prey are regularly seen.<br><br>There are a number of sites of historical interest on the edge of Tormarton and these are situated in several of the nominated LGS(LGSD315, LGSD318, LGSD319 and LGSD988). As history is one of the criteria listed in the guidance on LGS designation (SGC Background Paper dated June 2016), history should be included in the re-assessment.<br><br>For these reasons TPC think that the value of wildlife to a community and historical considerations should be included in the reassessment of LGS in the Local Plan. Also, with respect of LGSD319 in which the Eastern field of the LGS originally nominated was removed, this LGS should be reassessed in light of information communicated to SGC in 2017 (letter from Craig Noel, dated 3rd January 2017, Strutt & Parker Ref: CLN/PC). |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hanham Community Trust (Land at Hanham Community Centre) |
| **Comment ID** | 19926241/1331 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | A Response Form has been submitted in relation to Sites 2 and 3 which sets out that neither site should be designated as a Local Green Space. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Adrian Edmonds |
| **Comment ID** | 19926305/1341 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **Designated Local Green Spaces:**<br><br>I agree with the proposals for the reconsideration of previous decisions not to designate particular sites as Local Green Spaces (where these have particular local value such as historical importance, ecological value, or history of free public access, etc), and for inviting nomination of new sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hanham Community Trust (Land at Hanham Sports Ground) |
| **Comment ID** | 20104449/1356 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | A Response Form has been submitted in relation to Sites 2 and 3 which sets out that neither site should be designated as a Local Green Space. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hanham Community Trust (Land North of Abbots Road) |
| **Comment ID** | 20107489/1373 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | A Response Form has been submitted in relation to Sites 2 and 3 which sets out that neither site should be designated as a Local Green Space. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Daniel Kelly - South Gloucestershire Liberal Democrat Council Group |
| **Comment ID** | 10311137/1440 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | We support the principle of a 15m buffer relating to future transport investment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Justine de Mink |
| **Comment ID** | 19936033/1488 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | Dear Sir/Madam.<br><br>I have been resident in South Gloucestershire since . I have read with interest the Local Plan as published on the Council Website and my Response is below:<br><br>I support the views and Reports submitted by Hanham District Green Belt Conservation Society and the Keep Hanham Abbots Special Group.<br><br>Specifically, regarding the Call for Sites Map I do NOT believe the sites (listed below) should go forward for assessment as they do not align with the Vision, Strategy and Policies set out in the Plan or the Joint Spatial Plan; that I wish to nominate SG82 the Cricket Ground and SG259 Gover Road and Stone Hill View Green Space as Designated Local Green Spaces. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Caroline White |
| **Comment ID** | 17228929/1500 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | Yes.<br><br>I object to the Hanham Cricket Club being withdrawn from the list of designated Green Spaces in the PSP Document, apparently because of an objection.<br><br>The Cricket Club is owned by Hanham Community Centre, who deny requesting its withdrawal. The request was apparently made by Agents acting on behalf of Hanham Community Centre. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Jeremy White |
| **Comment ID** | 19936257/1507 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | I would like to see some protection afforded to the Hanham Cricket and Tennis Club fields by the area becoming a designated Green Space. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Gareth Shehean |
| **Comment ID** | 19936929/1514 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | I completely support the views and Reports submitted by Hanham District Green Belt Conservation Society and the Keep Hanham Abbots Special Group. Specifically regarding the Call for Sites Map, I do NOT believe the sites (listed below) should go forward for assessment as they do not align with the Vision, Strategy and Policies set out in the Plan or the Joint Spatial Plan; that you wish to nominate SG82 the Cricket Ground and SG259 Gover Road and Stone Hill View Green Space as Designated Local Green Spaces. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Berni O'Mahony |
| **Comment ID** | 10194497/1526 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | Question 6:<br><br>I wish to nominate the following sites as Designated Local Green Spaces and this is supported by the community of Hanham:<br><br>• SG82 The Cricket Ground.<br>• SG259 Gover Road and Stone Hill View Green Space. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | The Engine Common Trustees (ECT) |
| **Comment ID** | 19741409/1565 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | The issue of DLGS appears to be on two fronts in respect of the Council's Consultation i.e. both for this Question and as a separate self-contained specific Consultation exercise. ln our view, it is not clear as to exactly what discussion is contemplated under this point as points 1 and 2 in the text simply refer to the requirements of the PSP lnspector's requirements set out in Paras 25 - 29 of her Report dated 21st September 2017. There is no choice in this. Point 3 seeks new nominations, which given the extent and recent PSP based nominations considered, seems premature when there has yet to be substantive progress on the identification of new housing sites as envisaged by the lnspector in her Report.<br><br>Furthermore, separate Consultation text from the Council on DLGS makes clear that the reassessment of these nominations following on from the PSP process has yet to be undertaken. There still therefore appears to our Clients to be a lack of transparency as to the evidence and reasoned assessments in respect of same. Therefore, objections previously made in response to the PSP process have continued to be made at this time - these are the subject of separate Representations submitted simultaneously with these.<br><br>Please let us know if you require any further information or clarification in respect of anything contained in these Representations. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | M. S. Howes |
| **Comment ID** | 19741377/1576 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | The issue of DLGS appears to be on two fronts in respect of the Council's Consultation i.e. both for this Question and as a separate self-contained specific Consultation exercise. ln our view, it is not clear as to exactly what discussion is contemplated under this point as points 1 and 2 in the text simply refer to the requirements of the PSP lnspector's requirements set out in Paras 25 - 29 of her Report dated 21st September 2017. There is no choice in this. Point 3 seeks new nominations, which given the extent and recent PSP based nominations considered, seems premature when there has yet to be substantive progress on the identification of new housing sites as envisaged by the lnspector in her Report.<br><br>Furthermore, separate Consultation text from the Council on DLGS makes clear that the reassessment of these nominations following on from the PSP process has yet to be undertaken. There still therefore appears to our Clients to be a lack of transparency as to the evidence and reasoned assessments in respect of same. Therefore, objections previously made in response to the PSP process have continued to be made at this time - these are the subject of separate Representations submitted simultaneously with these.<br><br>Please let us know if you require any further information or clarification in respect of anything contained in these Representations. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Rockfield Farms Limited (RFL) |
| **Comment ID** | 20069217/1590 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | The issue of DLGS appears to be on two fronts in respect of the Council's Consultation i.e. both for this Question and as a separate self-contained specific Consultation exercise. ln our view, it is not clear as to exactly what discussion is contemplated under this point as points 1 and 2 in the text simply refer to the requirements of the PSP lnspector's requirements set out in Paras 25 - 29 of her Report dated 21st September 2017. There is no choice in this. Point 3 seeks new nominations, which given the extent and recent PSP based nominations considered, seems premature when there has yet to be substantive progress on the identification of new housing sites as envisaged by the lnspector in her Report.<br><br>Furthermore, separate Consultation text from the Council on DLGS makes clear that the reassessment of these nominations following on from the PSP process has yet to be undertaken. There still therefore appears to our Clients to be a lack of transparency as to the evidence and reasoned assessments in respect of same. Therefore, objections previously made in response to the PSP process have continued to be made at this time - these are the subject of separate Representations submitted simultaneously with these.<br><br>Please let us know if you require any further information or clarification in respect of anything contained in these representations. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Downend Estates Limited (DEL) |
| **Comment ID** | 1463137/1601 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | The issue of DLGS appears to be on two fronts in respect of the Council's Consultation i.e. both for this Question and as a separate self-contained specific Consultation exercise. ln our view, it is not clear as to exactly what discussion is contemplated under this point as points 1 and 2 in the text simply refer to the requirements of the PSP lnspector's requirements set out in Paras 25 - 29 of her Report dated 21st September 2017. There is no choice in this. Point 3 seeks new nominations, which given the extent and recent PSP based nominations considered, seems premature when there has yet to be substantive progress on the identification of new housing sites as envisaged by the lnspector in her Report.<br><br>Furthermore, separate Consultation text from the Council on DLGS makes clear that the reassessment of these nominations following on from the PSP process has yet to be undertaken. There still therefore appears to our Clients to be a lack of transparency as to the evidence and reasoned assessments in respect of same. Therefore, objections previously made in response to the PSP process have continued to be made at this time - these are the subject of separate Representations submitted simultaneously with these.<br><br>Please let us know if you require any further information or clarification in respect of anything contained in these Representations. |

| | |
|---|---|
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hannah Saunders - Dodington Parish Council |
| **Comment ID** | 19931969/1612 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **COMMENTS:**<br><br>Members of Dodington Parish Council fully engaged with the PSP process and nomination of Local Green Spaces a few years ago.<br><br>We were pleased when all of the sites that we put forward were designated at the end of 2017.<br><br>During this Consultation process for the New Local Plan – an email was received from within the Strategic Planning Team at SGC…. because Dodington Parish Council were identified as potential landowners or leaseholders of several designated sites:-<br><br>o LGSD672 (Wapley Common/Nature Reserve) - DPC are landowners.<br><br>o LGSD073 (QEII Playing Fields) - DPC are landowners.<br><br>o LGSD068 (3 Dodington Allotment Sites) - DPC are landowners.<br><br>The reason for the email was to inform us that future development on designated Local Green Spaces will be restricted….. and SGC would be grateful for confirmation from DPC (as landowners) that they are in support of (or wish to object to) the designation of the above Local Green Spaces.<br><br>I CAN CONFIRM THAT DODINGTON PARISH COUNCIL ARE FULLY IN SUPPORT OF THE DESIGNATION OF THE ABOVE 3 LOCAL GREEN SPACES.<br><br>Another site was also mentioned in the email from :<br><br>o LGSD078 (Robin Way Allotments)…. DPC aren't the owners or leaseholders of this area of land – it is in private ownership – so obviously can't Comment – other than the site was designated at the end of 2017 – and they would very much like that designation to remain in place.<br><br>Although none of the sites that Dodington Parish Council put forward weren't designated – Members are pleased that sites that weren't designated are being reassessed.<br><br>With regards whether totally new sites would be more appropriately considered through development of a Neighbourhood Plan…. Members feel this is a tall order…. (unless the settlement in question is wanting to look at all aspects of development and go down that route – but for those that are just wanted to designate Green Spaces it wouldn't be appropriate. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Taylor Wimpey |
| **Comment ID** | 20068353/1659 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | On behalf of our Client, Taylor Wimpey, we object to the proposed designation of the following areas of Local Green Space; LGSD209, LGSD202, and LGSD1171. Our full reasoning and justification for this is set out in the accompanying letter and Response Form which are submitted in response to the concurrent Consultation on Local Green Space Designations. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | E. H. Schubert Will Trust |
| **Comment ID** | 12403425/1679 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | As part of the Planning process, there should be a reasonable assessment made of Green Space and its contribution to residential areas. Development of such areas should not be at the expense of developing other land which would contribute more significantly and successfully to the built environment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Frampton Cotterell Parish Council |
| **Comment ID** | 20175105/1696 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |

| | |
|---|---|
| **Comment** | Frampton Cotterell Parish Council believes that there needs to be opportunities for more Green Spaces and that the ones currently in place need to be protected. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Chris Skidmore MP |
| **Comment ID** | 5008193/1703 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | Dear ,<br><br>I am writing to you to respond formally to the Consultation on the Council's new Local Plan.<br><br>The Document is wide ranging and so I focus my Response on the aspects that Constituents have made Representations to me since the Consultation was first launched in February.<br><br>**Local Green Spaces:**<br><br>Local Green Space Designation is a way to provide special protection against development for green areas of particular importance to Kingswood residents. I recognise that the designation must conform with national Planning Policy.<br><br>I was delighted to see through the Policies, Sites and Places (PSP) Plan around 100 treasured Green Spaces across the Constituency were granted Local Green Space Designation last year – protection that they had never had in the past and which has only been possible through the new powers contained in the National Planning Policy Framework.<br><br>During the Examination in Public of the PSP Plan, the Council agreed to reassess all nominated Spaces that were not designated in the PSP Plan – just under 100 Spaces across the Constituency. I welcome this undertaking and the new opportunity to put right what I consider to be significant omissions in the PSP Plan.<br><br>One such Space which the community was bitterly disappointed did not receive this designation was Hanham Cricket Club on Abbots Road. I have collected a 2,000 name petition calling for this protection for the Cricket Club site from development proposals.<br><br>To help provide clarity on the Council's powers in this regard, the Housing Minister has confirmed following a question from me in the Commons Chamber that the final decision on granting this status to any Space rests with the Council. An objection from the landowner is not sufficient grounds to reject the application of this status on a site. Therefore I urge the Council to prioritise the community's very clear desire for this added protection for the Cricket Club site over and above any (inevitable) landowner objection. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | G. E. Forward |
| **Comment ID** | 20176577/1714 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | In my opinion SGC have been detrimental in not designating the Cricket Ground in Abbots Road because it was under threat of development from an Agent not the owners. Driven once again by profit not the interest of 1,200 residents who signed the local MP's Petition. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hazel Jones - Hawkesbury Parish Council |
| **Comment ID** | 16665185/1738 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **Local Designated Green Spaces:**<br><br>Hawkesbury Parish Council put forward several Green Spaces in the PSP. We would like to once again put forward:<br><br>The land known and used as the allotments off Birgage Road.<br><br>Hawkesbury, Inglestone, Airly and Hassly Commons – known locally as The Commons. |

| | |
|---|---|
| | Hawkesbury Pool. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alan Yeates |
| **Comment ID** | 15386497/1846 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | Good morning,<br><br>I've have had a fairly lengthy exchange of emails with Andy Perkins recently and he has spoken to the Spatial Planning Team who has given the 'OK' to send in a late Submission for the Local Plan.<br><br>There are really just two main points that I would like to be addressed:<br><br>1. I think it would be beneficial for Green Space preservation, to use a rolling period based formula to calculate how much green space has already been lost to development in a given period in the area to see if new development should be allowed, especially with abundance of alternative Brownfield sites giving more weight to the protection of green space. The reason for this request is because Planning Officers currently only asses the removal of trees and green space on the development they are assessing and do not take into account the cumulative effects over time, i.e. lots of small scale removal adds up to no green space in 10 years time. Hopefully between this and the current LGSD this should ensure the area retains enough green space to not become like the areas surrounding the City Centre, thereby retaining amenity, air quality and Biodiversity.<br><br>2. I was wondering if there is a possibility of changing the rules for future developments with multiple Plots to take each Plot on its own merits, regardless of the Application being one large Application as opposed to multiple small ones. This is because the benefits of a multiple Plot development as a whole can outweigh the negative effects on green space/wildlife or one or two neighbours whereas if the Plots were each assessed on their own merits, one or two Plots could be denied or amended. This would make the decision making process a lot fairer for those "in the minority" so to speak.<br><br>If these could be considered for the Local Plan I would be very grateful. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | A. Watson |
| **Comment ID** | 19925761/1848 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | In consideration of the above I wish to nominate SG82 as a Designated Local Green Space. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Wendy Shortman |
| **Comment ID** | 19936545/1850 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | LGSD130 and LGSD729<br><br>I also wish to nominate SG82 The Cricket Ground & Stonehill View Green Space as designated Local Green Spaces. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tony Albon-Crouch - Marshfield Parish Council |
| **Comment ID** | 15617697/1877 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **Designated Green Spaces:**<br><br>'Points for Discussion' on P. 78 of the Consultation Document asks if Local Green Spaces could be considered through the production of Neighbourhood Plans. We would not support a position whereby Neighbourhood Plans effectively became compulsory. Such Plans depend upon communities having residents with the time and skills to pursue such an exercise, and this is neither guaranteed nor is it uniform across all communities. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | JFG Gunnery |
| **Comment ID** | 19741793/1980 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | As part of the Planning process, there should be a reasonable assessment made of Green Space and its contribution to urban areas. Development of such areas should not be at the expense of developing other land, that is perhaps on the edge of a settlement or a reasonable distance of one, which would contribute more significantly and successfully to supporting that settlement and the built environment.<br><br>Any assessment of Local Green Space should be in the context of a Strategy which seeks to improve the wider urban area – perhaps through further additional development. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ellen Kenny - Siston Parish Council |
| **Comment ID** | 7853761/2029 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **PAGE 78 Designated Local Green Spaces**<br><br>**1. Points for Discussion:**<br><br>**The Policies, Sites and Places (PSP) Plan Inspector concluded that all Spaces nominated but not designated in the PSP Plan should be reassessed as part of this new Local Plan. We intend to do this by taking account of the conclusions reached by the Inspector, which included:**<br><br>*** The use of a 15m buffer relating to future transport investment;**<br><br>*** Assessement of whether sites already protected for other purposes would derive additional local benefit from Local Green Space LGS) designation; and**<br><br>*** Assessement of whether several designated sites together constitute an extensive tract of land.**<br><br>**QUESTION 6:**<br><br>**Do you have any views on the above discussion points in relation to designated Local Green Spaces?**<br><br>***Recommend***<br><br>***Of the sites nominated by Siston Parish Council those for Bridgeyate Common, Goose Green Common and Webbs Heath Common have not been designated, with these being delayed because of, what is considered to be, speculative development options only.***<br><br>***Whilst those registered areas of common land have enjoyed special protection thus far, introduction of Call for Sites legislation have clearly put these at great risk. Progressing to Local Green Space designation for these at risk sites would ensure that any future Applications for change would continue to be for the Secretary of State to determine. Such a legal process will best help to preserve this public open space for the benefit of future generations.***<br><br>***It is noted the nomination for Webbs Heath Common was subject to very late objection only with this site understood to be in the same ownership as other adjacent Green Belt land subject to a Call for Sites Submission, It is hoped this is recognised as further need and justification for providing added protection by designating as Local Green Space.***<br><br>**Submitted by Cllr John Hunt in advance of the meeting of Siston Parish Council on Thursday 15th March 2018 providing relevant background information and recommendations for the consideration of those present on that occasion.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sue Hope |
| **Comment ID** | 411169/2040 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **Local Designated Green Spaces:** |

| | |
|---|---|
| | Parishes in the Ward put forward areas for Local Designated Green Space in the previous PSP.<br><br>These should all be reconsidered as part of the LDGS in the new Local Plan including the following:<br><br>The land known and used as the Allotments off Birgage Road, Hawkesbury Upton.<br><br>Hawkesbury, Inglestone, Airly and Hassly Commons – known locally as The Commons.<br><br>Hawkesbury Pool. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Paul Davis - Persimmon Homes Severn Valley |
| **Comment ID** | 3553569/2144 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | Question 6 – Designated Local Green Spaces:<br><br>8.4 The following Comments should be read with our separate Response to the Consultation on Local Green Space Designation particularly in relation to Land at Park Farm, Chipping Sodbury. Guidance on designation of land as Local Green Space is clearly set out in the NPPF and the NPPG.<br><br>8.5 The starting point in considering designation of and Policies for Local Green Space is that it is an exceptional designation.<br><br>8.6 The exceptional nature of the designation is emphasised in NPPF76 which refers to this expressly as *'special protection'* and Paragraph 77 expressly states that *'it is not appropriate for most green spaces or open space.'* Paragraph 77 then sets out a three point test which has to be applied and even before that, there is a re-emphasis of the exclusivity of the designation: *'the designation should only be used.'*<br><br>8.7 In addition, further guidance in the Paragraph 77 Tests confirms that Local Green Space must be physically limited and constrained. The reference is to *'reasonably close proximity to the community it serves'* and *'it cannot be an extensive tract of land.'* The second test is effectively two separate tests. It says the designation should only be used where the green area is *'demonstrably special to a local community'* and then *'holds a particular local significance.'* The concise Oxford Dictionary definition of demonstrable is that it should be *'capable of being shown'* or *'logically proved.'* Therefore this requires very strong objective evidence to demonstrate how all these components are met and each of the criteria the Consultation Document identifies in 6.2.4 should be assessed for each proposed LGS.<br><br>8.8 The restrictive nature of the designation is further confirmed in NPPF78, which says that Local Green Space should be consistent with Policies for Green Belts. Effectively this requires the application of an exceptional circumstances test when considering the allocation of each area of Local Green Space.<br><br>8.9 NPPF87 relating to Green Belts says *'inappropriate development . . . should not be approved except in very special circumstances.'* NPPF89 also sets out specific exceptions which would be appropriate in the Green Belt.<br><br>8.10 However there is then a further overriding test which must be applied. That is found in Paragraph 76 of the NPPF which says 'identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.<br><br>8.11 Further guidance on this overriding test is expanded in the Section in NPPG dealing with Open space, sports and recreation facilities, Public Rights of Way and Local Green Space, where NPPG37-007 says:<br><br>*'Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, Plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in any way that undermines the aim of Plan making.'*<br><br>8.12 As set out in response to Proposal ULH1 above we do not consider these tests are satisfied and identified development needs will be met.<br><br>8.13 Given the very restrictive nature of Local Green Space, the Council needs to consider whether Local Green Space designation is appropriate if the proposed Policy intention is to consider potential for ancillary development to support the open space function of the land.<br><br>8.14 We note with concern that the Council have taken a liberal interpretation of the Inspector's conclusions to review all sites previously rejected as appropriate for designation as Local Green Space. That is unnecessary as a number of sites could and should have been rejected on a first sieve at this stage where they clearly would not meet Local Green Space criteria. This includes sites which would obviously be extensive tracts and land which constitutes highway verges.<br><br>15 Metre Buffer:<br><br>8.15 We consider the Guidance Document is unclear over the application of the 15 metre buffer. From the wording in the Document it appears that the buffer should only be applied to existing Local Green Space in view of the reference to *'all Local Green Spaces where potential conflict . . . might occur.'*<br><br>Sites Already Protected for Other Purposes: |

| | |
|---|---|
| | 8.16 As set out above, the starting point for considering Local Green Space has to be that it is an exceptional designation ('*designation should only be used*') and that *'it is not appropriate for most Green Spaces or open space.'* NPPG37-010 in addressing whether Green Belt land should additionally be considered for Local Green Space designation identifies particular importance to the local community as the only relevant additional consideration.<br><br>Amalgamation of Designations into an Extensive Tract:<br><br>8.17 We do not consider the Council should seek to circumvent the Extensive Tract Test by identifying smaller areas that together would constitute an extensive tract. That would be contrary to the intention of the specific guidance in NPPG 37-015 that *'blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a "back door" way to try to achieve what would amount to a new area of Green Belt by another name.'* |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Barratt Homes (Bristol) |
| **Comment ID** | 20287457/2181 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | LGSD063<br><br>PART 3C - Designated Green Spaces (P. 78) – Question 6<br><br>PART 3C - Designated Green Spaces (P. 78) – Question 6:<br><br>Warner's Court (Green Space Code: LGSD063) was previously included as a proposed Local Green Space in the Regulation 18 stage Policies, Sites and Places Plan (PSP) but was 'dropped' due to insufficient justification and previous landowner objection. The Local Plan Consultation Document sets out at P. 50 that in response to the Inspector's conclusions on the PSP, it is now proposed to reconsider those sites which were not included.<br><br>The extent of the Local Green Space previously proposed at Warner's Court covered the entire Southern part of the Land North of Wotton Road site; we note that the extent of the Local Green Space designation now proposed (as shown on the Interactive Online Map) is slightly reduced at the Eastern extents.<br><br>We have previously submitted Representations in respect of the Regulation 18 and Regulation 19 versions of the PSP objecting to the designation of Warner's Court as a Local Green Space for the following reasons:<br><br>Warner's Court is privately owned land which is in lawful residential use, and is surrounded by associated agricultural land in the same ownership. Whilst Barratt Homes currently has an option to purchase the site for residential development, should that development not come forward there is no obligation for the owner to sell or otherwise release the land. In any event, the part of the land holding which is proposed for Local Green Space designation (covering the current residential buildings) is to be retained by the landowner save for a small part included within the Planning Application to facilitate access.<br><br>Paragraph 73 of the NPPF states that "*access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and wellbeing of communities.*" There is no right of access to or Public Right of Way across the site. The site is in use as lawful residential use and agricultural use and therefore offers no opportunity for sports or recreation. This confirms that as per Paragraph 74 of the NPPF the site is not "*an existing open space, sports or recreational land.*"<br><br>The NPPF clearly places the emphasis on the designator to demonstrate that the site is demonstrably special. Neither the local community nor the Council has not provided any compelling evidence as to why the site at Warner's Court is of "*particular importance*" to them in the terms of Paragraph 76 of the NPPF (also Ref: PPG 005 Reference ID:37-005-20140306) or that it is "*special to the local community*" or holds "*particular significance*" as required by Paragraph 77.<br><br>In the LGS February 2018 Evidence Base Document, the Council states of Warner's Court: *"This space is significant because of its beauty. This space has wildlife significance. This is an area of beauty and richness of wildlife. All of these spaces make useful contributions to the village in their different ways, including recreation and the setting of a Listed Building."* In our view, this is a generic statement which fails to specify *how or why* the site is special in terms of it features or location.<br><br>The 'Concept Plan' for Charfield contained within the SDL Template supporting the Emerging JSP shows the area in question for 'New Facilities.' Draft JSP Policy 7.9 states that:<br><br>*"The future role and function of existing retail and community assets and remaining Greenfield land parcels within the centre of the village adjoining the Wotton Road will firstly be reviewed in Consultation with the local community to ensure future needs are assessed, new and existing facilities make the most efficient use of land and they assist to maximise the sustainability of the expanded village."*<br><br>It should again be should be stressed that the land identified for possible Local Green Space is not an existing 'asset' or 'Greenfield' land, it is a privately owned residential/agricultural holding, and therefore in respect of this land it is not within the gift of the local community to determine its use.<br><br>Notwithstanding the above Comments, at this stage it is clear the Council (in Consultation with the community) has not decided what the ultimate use of the Warner's Court land 'should' be in accordance with the Emerging JSP proposals. The proposed designation of a Local Green Space is at odds with the support for the provision of a retail unit on the site, and with other possibilities such as using the land for railway station parking which is implied in the Council's evidence for the Land North of Wotton Road Appeal. To seek to designate a Local Green Space when this review is not resolved is clearly hasty. |

| | |
|---|---|
| | PPG Paragraph 007 (Reference ID: 37-007-20140306) confirms that Local Green Space designation should not be used in a way that undermines the aim of Plan making to identify sufficient land in suitable locations to meet identified development needs. PPG Paragraph 008 (Reference ID: 37-008-20140306) confirms that Local Green Space Designation will rarely be appropriate where the land has Planning Permission for development. The Council should not be seeking to apply a Local Green Space Designation through the Local Plan as a means of resisting the Appeal proposals whilst the 'review' of the land is undertaken and without a robust justification for doing so.<br><br>The Appeal proposals also include circa 2 hectares of public open space to the North of Appeal site which will include natural space, recreational space, woodland, a community orchard, Allotments and children's play and will form part of a wider network for Charfield as linked by Public Right of Way OCH 8. The proposed Local Green Space designation appears to be unconscious of this.<br><br>We therefore strongly object to the proposed designation of Warner's Court as a Local Green Space as it is unjustified, unavailable and at odds with the delivery of the proposed development at Land North of Wotton Road which seeks to bring forward the early delivery of up to 121 dwellings, retail unit, public open space and ecological mitigation as part of the JSP proposals in line with the Concept Plan. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ashfield Land |
| **Comment ID** | 16658689/2281 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **Q6. C. Designated Green Spaces**<br><br>***Do you have any views on the above discussion points in relation to designated Green Spaces?***<br><br>8.34 We note that the Policies, Sites and Places (PSP) Plan Inspector requested that all sites nominated for Local Green Space Designation be reconsidered as part of the Plan Review. We have no substantive Comments on the limited discussion points raised as part of the NLP Consultation Document but do have specific Comments in respect to the reconsideration of the Castle Farm Road site for such a designation.<br><br>8.35 As part of the preparation of the PSP Plan the site was considered to be allocated as a Local Green Space Designation. A significant amount of land was assessed at this stage and some parcels formally allocated as LGS in the final version of the PSP. Policy PSP 4 states the following in respect to the designated sites:<br><br>*'Inappropriate development proposal(s) within a designated Local Green Space, as shown on the Policies Map and listed in Appendix 2, will only be acceptable, in very special circumstances. Very special circumstances will not exist unless the potential harm to the designated space by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. The construction of new buildings on Local Green Spaces is inappropriate.*<br><br>*Exceptions to this are:*<br><br>*• Buildings for agriculture and forestry, within Local Green Spaces located outside a Settlement Boundary; or*<br><br>*• The provision of appropriate facilities for outdoor sport, outdoor recreation and Cemeteries, as long as it does not conflict with the purpose of designating the Local Green Space; or*<br><br>*• The extension or alteration of a building, provided that it does not result in a disproportionate addition over and above the size of the original building, in line with Policy PSP7; or*<br><br>*• The replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces.'*<br><br>8.36 The initial nomination, made by third parties, was justified on the basis that the space has recreational and wildlife significance and its status as Green Belt with Public Rights of Way running through it. It was also alleged that it formed an important environmental and ecological link with the Avon Valley Woodland.<br><br>8.37 As part of the 2014 Consultation the landowner objected to the designation of this land as a Local Green Space. The Council's records state that the objection, combined with the fact that the site was covered by a Call for Sites Submission, meant that the site could not be designated as such.<br><br>8.38 If the site were to be allocated as a Local Green Space Policy PSP4 would apply which gives nearly the same level of protection as a Green Belt status. This means that the construction of new buildings would be inappropriate development, with exceptions for the provision of outdoor sport, recreation and Cemetery facilities; expansion or alteration of an existing building; or the replacement of an existing building. Replicating this level of control would be inappropriate in our view.<br><br>8.39 Such a designation would preclude the ability of the site to deliver housing in a highly sustainable and accessible location where the impact on the functions of the Green Belt can be minimised.<br><br>8.40 The site is also inappropriate for designation as a Local Green Space as the large majority of the land is not publically accessible to the local community. We note the reference to Public Rights of Way, but this does not allow extensive and unfettered recreational use and access across the land. National Guidance clearly advises that it is inappropriate to designate linear corridors as Local Green Space simply to protect Rights of Way, which are already protected under other legislation.<br><br>8.41 The linkages between the existing residential areas of Hanham and the Avon Valley Woodland would be retained in the Masterplan as the proposals protect the existing Public Rights of Way and create new, publically accessible corridors through the site. These also provide enhanced |

| | |
|---|---|
| | Wildlife Corridors, and in any event the Ecology Survey work undertaken to date has not identified extensive use of the site by wildlife that would be any different from other undeveloped land that lies adjacent to the existing urban edge of Hanham.<br><br>8.42 In conclusion the previous decision not to allocate the site as LGS should be upheld. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Amanda Scott |
| **Comment ID** | 20374561/2292 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **Designated Local Green Spaces:**<br><br>I agree with the proposals for the reconsideration of previous decisions not to designate particular sites as Local Green Spaces (where these have particular local value such as historical importance, ecological value, or history of free public access, etc), and for inviting nomination of new sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Fortannia Ltd |
| **Comment ID** | 19741217/2329 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | **Qu.6 C Designated Local Green Spaces. Do you have any views on the above discussion points in relation to designated Local Green Spaces?**<br><br>As part of the Planning process, there should be a reasonable assessment made of Green Space and its contribution to urban areas. Development of such areas should not be at the expense of developing other land, that is perhaps on the edge of a settlement or a reasonable distance of one, which would contribute more significantly and successfully to supporting that settlement and the built environment.<br><br>Any assessment of Local Green Space should be in the context of a Strategy which seeks to improve the wider urban area – perhaps through further additional development. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Redrow Homes South West, Julia Wallington, Debra Turner, Andrew Williams, Chr... |
| **Comment ID** | 20167105/2349 |
| **Document Part Name** | Question 06 - Designated Local Green Spaces |
| **Comment** | 8.32 We note that the Policies, Sites and Places (PSP) Plan Inspector requested that all sites nominated for Local Green Space Designation be reconsidered as part of the Plan Review. We have no substantive Comments on the limited discussion points raised as part of the NLP Consultation Document but do have specific Comments in respect to the reconsideration of Land North of Iron Acton Way for such a designation.<br><br>8.33 As part of the preparation of the PSP Plan the site was considered to be allocated as a Local Green Space Designation. A significant amount of land was assessed at this stage and some parcels formally allocated as LGS in the final version of the PSP. Policy PSP 4 states the following in respect to the designated sites:<br><br>*'Inappropriate development proposal(s) within a designated Local Green Space, as shown on the Policies Map and listed in Appendix 2, will only be acceptable, in very special circumstances. Very special circumstances will not exist unless the potential harm to the designated Space by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. The construction of new buildings on Local Green Spaces is inappropriate.*<br><br>*Exceptions to this are:*<br><br>*• Buildings for agriculture and forestry, within Local Green Spaces located outside a Settlement Boundary; or*<br><br>*• The provision of appropriate facilities for outdoor sport, outdoor recreation and Cemeteries, as long as it does not conflict with the purpose of designating the Local Green Space; or*<br><br>*• The extension or alteration of a building, provided that it does not result in a disproportionate addition over and above the size of the original building, in line with Policy PSP7; or*<br><br>*• The replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces.'*<br><br>8.34 We have already discussed the implications of allocating this land as a Local Green Space designation in Paragraphs 7.34 – 7.41 of our statement above. As part of the 2014 Consultation six landowners objected to the designation of this land as a Local Green Space. The Council's records state that these objections, combined with the fact that the site was covered by a Call for Sites Submission, meant that the site could not be designated as such.<br><br>8.35 If the site were to be allocated as a Local Green Space Policy PSP4 would apply which gives nearly the same level of protection as a Green |

| | |
|---|---|
| | Belt status. This means that the construction of new buildings would be inappropriate development, with exceptions for the provision of outdoor sport, recreation and Cemetery facilities; expansion or alteration of an existing building; or the replacement of an existing building. Replicating this level of control would be inappropriate in our view.<br><br>8.36 Therefore, applying a LGS designation would be wholly inappropriate as it would preclude housing delivery here, in a sustainable location and also prevent strategic infrastructure provision into the wider SDL. This may preclude the early development of this allocation, or possibly prevent it all together.<br><br>8.37 The site is also inappropriate for designation as a Local Green Space as the large majority of the land is not publically accessible to the local community.<br><br>8.38 In conclusion the previous decision not to allocate the site as LGS should be upheld. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Chris Stow |
| **Comment ID** | 877825/10 |
| **Document Part Name** | Question 07 - Prvate Rented Sector (Build to Rent) |
| **Comment** | I am not keen on Build to Rent unless carried out by Local Authorities! I would much prefer a Build to Buy Policy so that young people can get on the housing ladder. We need more starter homes like 1 and 2 bedroom homes that are suitable for first time buyers.<br><br>Remarkable that the Government is quite happy to let private companies build houses for rent but do not allow Local Authorities to do the same! |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Lynne Goldsack-Rowland |
| **Comment ID** | 12185665/17 |
| **Document Part Name** | Question 07 - Prvate Rented Sector (Build to Rent) |
| **Comment** | I am very much in favour of rented housing being under the control of companies/Local Authorities and not private individuals. There is no indication in this Policy about rental cost. I should like to see rents capped at an affordable level and no extortionate fees/deposits so that people working in the area have a chance of somewhere stable to live. I would also like to see priority for any such developments being given to people with links to the area first and foremost, and this being a key part of the Policy. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Margaret Pinder - Sustainable Thornbury |
| **Comment ID** | 19372321/61 |
| **Document Part Name** | Question 07 - Prvate Rented Sector (Build to Rent) |
| **Comment** | We fully support this proposal as a way of providing much needed rented accommodation for those needing Affordable Housing.  We agree that this should be a Policy not restricted just to urban areas but included in proposals for SDLs also. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mayers |
| **Comment ID** | 16271713/94 |
| **Document Part Name** | Question 07 - Prvate Rented Sector (Build to Rent) |
| **Comment** | The homes should not be built for renting this is the main problem why people cannot afford homes. Rent is sky high and means you never end up saving for a deposit for a house. The banks are next to useless and it is incredibly hard to get a mortgage these days even if you use a save to buy account. Private renting should be the last thing to be considered. It is about affordable homes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anne Gale |
| **Comment ID** | 16344321/127 |
| **Document Part Name** | Question 07 - Prvate Rented Sector (Build to Rent) |
| **Comment** | So long as it's on Brownfield sites the rents should be affordable and not to fill  coffers. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Carolyn Baker |

| | |
|---|---|
| **Comment ID** | 17252193/211 |
| **Document Part Name** | Question 07 - Prvate Rented Sector (Build to Rent) |
| **Comment** | Properly managed private rental properties are to be encouraged to ease the housing crisis for those unable to buy their own homes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Helen Johnstone - Stroud District Council |
| **Comment ID** | 14317537/255 |
| **Document Part Name** | Question 07 - Prvate Rented Sector (Build to Rent) |
| **Comment** | 1. The definition of affordable private rent should be in line with Local Housing Allowance rates. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sarah Blackmore |
| **Comment ID** | 16193889/311 |
| **Document Part Name** | Question 07 - Prvate Rented Sector (Build to Rent) |
| **Comment** | There is a growing demand for rented properties however, rental prices in South Glos are very high. If this scheme can promise to offer affordable rental properties whilst maintaining a high standard, healthy environment for the tenants then in theory I would support this scheme. I do have some concerns about the 'flexibility on Parking Standards' as car ownership & usage continues to rise. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Hicks - Falfield Action Group |
| **Comment ID** | 16618369/329 |
| **Document Part Name** | Question 07 - Prvate Rented Sector (Build to Rent) |
| **Comment** | The Policy offers no real guidelines in respect of the location of BtR developments. The Greater London Authority's definition is one suitable for an URBAN area, not an Authority that is largely rural/Green Belt. The adoption of BtR being a minimum of 50 units would be inappropriate in many rural areas. If these developments are to be unique to urban development, this should be stated. If not, then there should be a different minimum in rural areas and no flexibility of Car Parking Standards as residents would still rely on the use of a private motor vehicle. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Claire Young |
| **Comment ID** | 916289/341 |
| **Document Part Name** | Question 07 - Prvate Rented Sector (Build to Rent) |
| **Comment** | I would not support 600 units, exclusively BtR developments, which go against the principles of creating balanced, mixed communities. There is a need for more rental properties for those unable to get on the housing ladder or who need greater flexibility to relocate than home ownership provides. It might be appropriate to have small BtR blocks within a development, but these should be mixed in with other tenures.<br><br>I also question the assertion that in a BtR development in South Gloucestershire car ownership would be lower than in other types of development. I am concerned that this conclusion has been reached by looking at the experience elsewhere and not taking into account the fact that car ownership more generally in those areas is lower than it is in South Gloucestershire. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tristan Clark |
| **Comment ID** | 19194177/362 |
| **Document Part Name** | Question 07 - Prvate Rented Sector (Build to Rent) |
| **Comment** | Build to Rent schemes should be investigated and encouraged if and only if the Local Authority can adequately protect the stock of such homes from depletion over time. New BtR homes should, as far as is legally permissible, be safeguarded against Right to Buy and Right to Acquire discounts otherwise the stock of BtR homes will be eroded over time by their transference to private ownership and ultimately to private buy-to-let landlords. This would only exacerbate the current housing crisis rather than mitigating its harmful effects. It is unacceptable to factor in and permit depletion over a long period of time (i.e. Decades) as this would simply burden future generations with a housing crisis of their own. The housing crisis demands a long term solution not a short term stopgap. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Simmons - Westerleigh Parish Council |
| **Comment ID** | 17221409/407 |
| **Document Part Name** | Question 07 - Prvate Rented Sector (Build to Rent) |

| | |
|---|---|
| **Comment** | **7D. Private Rented Sector (Build to Rent):**<br><br>**Do you have any comments on our intended approach to Build to Rent?**<br><br>**WPC supports the BtR/Private Rented Sector Strategy. However the assumption that car ownership would be lower is considered inaccurate and unsubstantiated.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alveston, Rudgeway, and Earthcott Parish Council |
| **Comment ID** | 19784545/438 |
| **Document Part Name** | Question 07 - Prvate Rented Sector (Build to Rent) |
| **Comment** | **As a small Parish we would be too small for this. However, we (principally) encourage home ownership through lower cost housing.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | J. Bond |
| **Comment ID** | 17779105/477 |
| **Document Part Name** | Question 07 - Prvate Rented Sector (Build to Rent) |
| **Comment** | There is usually little difference between the cost of renting and the cost of a mortgage for house purchase. However, one needs a substantial deposit to secure a mortgage for a house of one's own. The cost of renting is so high that one cannot save for a deposit.<br><br>A home belonging to oneself is an aspiration and engenders pride in one's property and its neighbourhood.<br><br>The rented sector should be Council Houses or possibly houses owned by Registered Charities, that is responsible landlords not seeking profit, not seeking to amass personal fortunes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alan Jones - Hanham District Green Belt Conservation Society |
| **Comment ID** | 17236353/510 |
| **Document Part Name** | Question 07 - Prvate Rented Sector (Build to Rent) |
| **Comment** | This initiative is rather late.<br><br>Our previous statements in this Response generally welcomes the provision of more rented accommodation in sustainable locations, but we require evidence that the type of scheme envisaged by the Policy description will be suitably managed. In addition, this form of development may well provide increased security for tenants, but will probably not deliver affordable rented accommodation.<br><br>The new Policy is an opportunity to introduce compliance with the NPPL Space/Dimension Guidelines for this new sector.<br><br>We consider that the relaxation of the Parking Standards would have to be on a scheme to scheme basis, depending on the location and proximity to Public Transport.<br><br>Why cannot SGC make inroads into their waiting lists and develop their own schemes?? |
| **Attached documents** | Hanham District Green Belt Conservation Society (Alan Jones).pdf (20.3 MB) |

| | |
|---|---|
| **Respondent Name** | Roy Crew |
| **Comment ID** | 3973121/536 |
| **Document Part Name** | Question 07 - Prvate Rented Sector (Build to Rent) |
| **Comment** | My Responses to the specific Local Plan Questions:<br><br>Question 7:<br><br>Why not build where possible Local Authority housing where the rents could be controlled? There are lots of derelict sites in Kingswood. More expensive but why do you not consider more underground parking? |

| | |
|---|---|
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Zoe Hancock - Bristol Avon Catchment Partnership |
| **Comment ID** | 19832225/682 |
| **Document Part Name** | Question 07 - Prvate Rented Sector (Build to Rent) |
| **Comment** | No additional Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Heather Elgar - West of England Nature Partnership |
| **Comment ID** | 19839553/794 |
| **Document Part Name** | Question 07 - Prvate Rented Sector (Build to Rent) |
| **Comment** | Please find below Comments from the West of England Nature Partnership (WENP) in response to the South Gloucestershire Local Plan Consultation.<br><br>For transparency, please know that Dominic Mellon (Consultant in Public Health for South Gloucestershire Council) sits on the WENP Board and thus note a declared conflict of interests. This Response reflects the aims and objectives of the Partnership and does not reflect views of individual Board members.<br><br>Question 7: Private Rented Sector (Build to Rent):<br><br>No Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Cate Davidson - Sodbury Town Council |
| **Comment ID** | 4877793/1014 |
| **Document Part Name** | Question 07 - Prvate Rented Sector (Build to Rent) |
| **Comment** | Dear Planning Team,<br><br>Sodbury Town Council responds as follows to the Local Plan (non strategic) Consultation:<br><br>Q. 7 No Comment.<br><br>Please note the Comments as appropriate. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | South West Strategic Development and Ian and David Knipe |
| **Comment ID** | 19884577/1111 |
| **Document Part Name** | Question 07 - Prvate Rented Sector (Build to Rent) |
| **Comment** | Please see submitted Representations. |
| **Attached documents** | SW Strategic Development and I. and D. Knipe - Grass Roots.pdf (27.4 MB) |

| | |
|---|---|
| **Respondent Name** | Susan E. Green - Home Builders Federation (HBF) |
| **Comment ID** | 10761601/1136 |
| **Document Part Name** | Question 07 - Prvate Rented Sector (Build to Rent) |
| **Comment** | If the Council pursue a new Policy proposal for Build to Rent then it should be based on the definition of Build to Rent as set out in the revised NPPF Annex 2: Glossary. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Emma Powell - Redrow Homes Limited |
| **Comment ID** | 19737921/1154 |

| | |
|---|---|
| **Document Part Name** | Question 07 - Prvate Rented Sector (Build to Rent) |
| **Comment** | Part 3 - Policy Discussion Points:<br><br>Section 3 of the Local Plan Consultation sets out the titles of proposed Strategic Polices that will be included in the next version of the Local Plan. As such we do not have any Comments on the titles, but reserve our position to Comment on the detailed wording at the next Consultation. All Policies will need to be prepared in the context of the emerging NPPF, a final version is expected to published in the next few Months. The Strategic Policies will also need to reflect any changes to the West of England JSP as it progresses through the Examination towards adoption anticipated later in 2019.<br><br>**Question 7:**<br><br>**D. Private Rented Sector (Build to Rent)**<br><br>**Do you have any Comments on our intended approach to Build to Rent?**<br><br>If the Council pursue a new Policy proposal for Build to Rent then it should be based on the definition of Build to Rent as set out in the revised NPPF Annex 2 : Glossary. |
| **Attached documents** | Redrow Homes Limited (Emma Powell) - Pegasus Group (Mrs. Sarah Hamilton-Foyn).pdf (34.1 MB) |

| | |
|---|---|
| **Respondent Name** | A. T. Bennett & Sons |
| **Comment ID** | 19926433/1362 |
| **Document Part Name** | Question 07 - Prvate Rented Sector (Build to Rent) |
| **Comment** | Please see attached Representations. |
| **Attached documents** | A. T. Bennett and Sons - Origin3 (Mr. Alex Cave).pdf (1.0 MB) |

| | |
|---|---|
| **Respondent Name** | Daniel Kelly - South Gloucestershire Liberal Democrat Council Group |
| **Comment ID** | 10311137/1441 |
| **Document Part Name** | Question 07 - Prvate Rented Sector (Build to Rent) |
| **Comment** | We are extremely concerned by this proposed Policy, which seems to fly in the face of the whole idea of sustainable, balanced and mixed communities identified as an objective elsewhere in the Consultation Document. With mortgage payments now more affordable than leases in most cases, we believe that the Authority should be prioritising the building of freehold properties rather than build-to-rent properties. While there may well be need for new rental properties in some communities, we believe that any community would struggle to absorb a rental development of 600 units, with the accompanying pressure on parking and other infrastructure. As such we do not support this approach. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hannah Saunders - Dodington Parish Council |
| **Comment ID** | 19931969/1613 |
| **Document Part Name** | Question 07 - Prvate Rented Sector (Build to Rent) |
| **Comment** | **COMMENTS:**<br><br>Members feel that Build to Rent is a good idea. Rental properties are always in high demand – and younger people struggle to get on the property ladder.<br><br>Taking the Greater London Authority approach is a good idea – although there is concern that the Covenant is only 15 years…. Members feel that this should be longer… as otherwise landlords could seek to make a profit… and mixed tenure in a block of 50 + units could be tricky to manage and end to sub-letting, etc.<br><br>The affordability of the rent on the BtR properties is essential for this to work, rents should be controlled. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | E. H. Schubert Will Trust |
| **Comment ID** | 12403425/1680 |
| **Document Part Name** | Question 07 - Prvate Rented Sector (Build to Rent) |
| **Comment** | It would be inappropriate for Build to Rent allocations to be made within the Plan. The approach to Build to Rent should respond to clear evidence within the Housing Market Area. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Frampton Cotterell Parish Council |
| **Comment ID** | 20175105/1697 |
| **Document Part Name** | Question 07 - Prvate Rented Sector (Build to Rent) |
| **Comment** | Frampton Cotterell Parish Council is in favour as long as the Build to Rent communities serve and support the local community. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | G. E. Forward |
| **Comment ID** | 20176577/1715 |
| **Document Part Name** | Question 07 - Prvate Rented Sector (Build to Rent) |
| **Comment** | This has been proven to not work. We need a complete rethink and SGC should be able to develop their own scheme. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | JFG Gunnery |
| **Comment ID** | 19741793/1981 |
| **Document Part Name** | Question 07 - Prvate Rented Sector (Build to Rent) |
| **Comment** | Care must be taken in the preparation of any Policy relating to PRS (Build to Rent). It would be inappropriate for Build to Rent only allocations to be made within the Plan. The approach to Build to Rent should respond to clear evidence within the Housing Market Area assessment. There is a recognised need to deliver all forms and tenures of housing – the SGLP should not place unwarranted barriers in front of this. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sebastian Loyn - YTL Developments (UK) Limited |
| **Comment ID** | 19779841/2077 |
| **Document Part Name** | Question 07 - Prvate Rented Sector (Build to Rent) |
| **Comment** | **Section 3:**<br><br>YTL welcome the review of key Policy particularly in relation to urban areas. However, until such time as the new Policies are proposed in more detail we only draw attention to items which may relate specifically to the Airfield.<br><br>D: Private Rented Sector:<br><br>YTL would consider the delivery of Private Rented Sector buildings within the Airfield and would therefore welcome a more detailed discussion with the Council around these Policies as they are developed. In particular understanding the long term holding requirements, and any impact on viability and parking. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Paul Davis - Persimmon Homes Severn Valley |
| **Comment ID** | 3553569/2145 |
| **Document Part Name** | Question 07 - Prvate Rented Sector (Build to Rent) |
| **Comment** | Question 7 – Private Rented Sector (Build to Rent):<br><br>8.18 The Council will now be aware of the Draft NPPF definition of Build to Rent and the guidance set out in the Draft NPPG which should be used to formulate any Policy guidance, rather than relying on GLA definitions.<br><br>8.19 The first issue for the Council is that the Draft Guidance is clear that any Policy should be subject to evidence – *'Local Planning Authorities should use a Local Housing Need Assessment to take into account the need for a range of housing types and tenures in their area including provisions for those who want to rent.'* Then *'if a need is identified, Authorities should include a Plan Policy'* (our emphasis). However, the JSP Wider Bristol SHMA does not specifically address Build to Rent and, anyway, where Volume 2 does consider the private rented sector generally, says *'Local Authorities need to understand the range of different households in their areas that currently rent from private landlords and consider their Policy Responses accordingly.'* Therefore the Council must prepare its own evidence to justify any Build to Rent Policy.<br><br>8.20 The Council should also look at the direction of guidance set out in Draft PPG (Page 44) that Authorities are expected to show how they will engage communities on the preliminary stages of Plan-making including publishing Documents forming part of the Evidence Base as they are completed, rather than waiting until options are published, or as we often find, publication of the Submission Plan.<br><br>8.21 Draft PPG also sets out 20% as a suitable benchmark for the level of affordable private rented homes to be provided in any scheme, but again this should be based on evidence and be viability tested. The Draft Guidance also emphasises that any Policy should be flexible and in particular take account of the different routes in the way affordable private rented homes can be provided and to allow *'both the proportion of affordable private rent units and discount offered on them can be varied across a development over time'* and *'a trade off between the proportion of* |

| | |
|---|---|
| | *discounted units and the discount(s) offered on them.'* The Policy should allow options to be agreed *'as part of the Planning Permission, and set out a Section 106 Agreement'* based on an assessment of viability. Again this is all guidance the Council will need to take into account in preparing the Local Plan. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Fortannia Ltd |
| **Comment ID** | 19741217/2330 |
| **Document Part Name** | Question 07 - Prvate Rented Sector (Build to Rent) |
| **Comment** | **Qu.7 D Private Rented Sector (Build to Rent). Do you have any Comments on our intended approach to Build to Rent?**<br><br>Care must be taken in the preparation of any Policy relating to PRS (Build to Rent). The approach to Build to Rent should respond to clear evidence within the Housing Market Area Assessment so as to ensure delivery is prompt. There is a recognised need to deliver all forms and tenures of housing – the SGLP should not place unwarranted barriers in front of this. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Margaret Pinder - Sustainable Thornbury |
| **Comment ID** | 19372321/62 |
| **Document Part Name** | Question 08 - Extra Care Housing |
| **Comment** | We agree the proposal. Affordable accommodation should be provided across all housing types. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anne Gale |
| **Comment ID** | 16344321/128 |
| **Document Part Name** | Question 08 - Extra Care Housing |
| **Comment** | So long as it's on brown sites or already developed sites then South Glos should provide adequate care for those who need it. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Helen Johnstone - Stroud District Council |
| **Comment ID** | 14317537/256 |
| **Document Part Name** | Question 08 - Extra Care Housing |
| **Comment** | 1. Fully support the provision of clarity around the Affordable Housing requirements for this type of accommodation. Ideally, all Extra Care Housing should be of mixed tenure although this is likely to be resisted by some providers. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Claire Young |
| **Comment ID** | 916289/342 |
| **Document Part Name** | Question 08 - Extra Care Housing |
| **Comment** | I support the requirement for Extra Care Housing to include an affordable element. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Simmons - Westerleigh Parish Council |
| **Comment ID** | 17221409/408 |
| **Document Part Name** | Question 08 - Extra Care Housing |
| **Comment** | **8E. Extra Care Housing:**<br><br>**Do you have any views on our proposed approach to the Use Class definitions in our Extra Care Housing Policy?**<br><br>**WPC support the intended approach to Extra Care Housing.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kevin Wilkinson - Avon and Somerset Police |

| | |
|---|---|
| **Comment ID** | 1052481/422 |
| **Document Part Name** | Question 08 - Extra Care Housing |
| **Comment** | The suggested criterion is floored as it fails to take into account the age brackets of the normal residents of that Extra Care Facility.<br><br>As the criteria stands a facility where the occupants by design are required to be say Over 55 could have a 22 year old 'Affordable Housing' resident placed into the facility. The different lifestyles of the different ages could then lead to friction and potentially anti-social behaviour or even crime.<br><br>Some form of wording concerning age perhaps needs to be considered. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alveston, Rudgeway, and Earthcott Parish Council |
| **Comment ID** | 19784545/439 |
| **Document Part Name** | Question 08 - Extra Care Housing |
| **Comment** | **No Comment** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | J. Bond |
| **Comment ID** | 17779105/478 |
| **Document Part Name** | Question 08 - Extra Care Housing |
| **Comment** | Should include an affordable quota provision as those likely to need extra care are also likely to be impoverished.<br><br>Housing should still be of a construction and appearance sympathetic to the existing buildings in the neighbourhood. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alan Jones - Hanham District Green Belt Conservation Society |
| **Comment ID** | 17236353/511 |
| **Document Part Name** | Question 08 - Extra Care Housing |
| **Comment** | No Comment except the demand for this type of care/accommodation will be rising and no information given as to how SGC will encourage necessary accommodation to meet demand. |
| **Attached documents** | Hanham District Green Belt Conservation Society (Alan Jones).pdf (20.3 MB) |

| | |
|---|---|
| **Respondent Name** | Roy Crew |
| **Comment ID** | 3973121/537 |
| **Document Part Name** | Question 08 - Extra Care Housing |
| **Comment** | My Responses to the specific Local Plan Questions:<br><br>Question 8:<br><br>There has recently been a new care development built near Hanham Common and a new one is being built on the Hanham-Bristol border. There is also a massive new development on the old Fry's site, at Somerdale. There is going to be an increasing need for more. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Zoe Hancock - Bristol Avon Catchment Partnership |
| **Comment ID** | 19832225/683 |
| **Document Part Name** | Question 08 - Extra Care Housing |
| **Comment** | No additional Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Heather Elgar - West of England Nature Partnership |
| **Comment ID** | 19839553/795 |

| | |
|---|---|
| **Document Part Name** | Question 08 - Extra Care Housing |
| **Comment** | Please find below Comments from the West of England Nature Partnership (WENP) in response to the South Gloucestershire Local Plan Consultation.<br><br>For transparency, please know that Dominic Mellon (Consultant in Public Health for South Gloucestershire Council) sits on the WENP Board and thus note a declared conflict of interests. This Response reflects the aims and objectives of the Partnership and does not reflect views of individual Board members.<br><br>Question 8: Extra Care Housing:<br><br>No Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Cate Davidson - Sodbury Town Council |
| **Comment ID** | 4877793/1015 |
| **Document Part Name** | Question 08 - Extra Care Housing |
| **Comment** | Dear Planning Team,<br><br>Sodbury Town Council responds as follows to the Local Plan (non strategic) Consultation:<br><br>Q. 8 STC agrees with the approach on the Extra Care Housing Policy.<br><br>Please note the Comments as appropriate. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Gill and Mike Dunkley |
| **Comment ID** | 19845441/1065 |
| **Document Part Name** | Question 08 - Extra Care Housing |
| **Comment** | Housing should provide greater provision for elder residents to 'downsize,' but still with appropriately sized Reception Rooms. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | South West Strategic Development and Ian and David Knipe |
| **Comment ID** | 19884577/1112 |
| **Document Part Name** | Question 08 - Extra Care Housing |
| **Comment** | Please see submitted Representations. |
| **Attached documents** | Strategic Development and I. and D. Knipe - Grass Roots.pdf (27.4 MB) |

| | |
|---|---|
| **Respondent Name** | Susan E. Green - Home Builders Federation (HBF) |
| **Comment ID** | 10761601/1137 |
| **Document Part Name** | Question 08 - Extra Care Housing |
| **Comment** | It is agreed that Policy CS20 should be updated. In determining whether or not Affordable Housing should be provided the Council should consider the self-containment of each unit for use by an individual household irrespective of the level of care available. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Emma Powell - Redrow Homes Limited |
| **Comment ID** | 19737921/1155 |
| **Document Part Name** | Question 08 - Extra Care Housing |
| **Comment** | Part 3 - Policy Discussion Points: |

| | |
|---|---|
| | Section 3 of the Local Plan Consultation sets out the titles of proposed Strategic Polices that will be included in the next version of the Local Plan. As such we do not have any Comments on the titles, but reserve our position to Comment on the detailed wording at the next Consultation. All Policies will need to be prepared in the context of the emerging NPPF, a final version is expected to published in the next few Months. The Strategic Policies will also need to reflect any changes to the West of England JSP as it progresses through the Examination towards adoption anticipated later in 2019.<br><br>**Question 8**:<br><br>**E. Extra Care Housing**<br><br>**Do you have any views on our proposed approach to the Use Class definitions in our Extra Care Housing Policy?**<br><br>Welcome the update to Policy CS20 Extra Care Housing in line with Use Class Definitions. In determining whether or not Affordable Housing should be provided the Council should consider the self-containment of each unit for use by an individual household irrespective of the level of care available. |
| **Attached documents** | Redrow Homes Limited (Emma Powell) - Pegasus Group (Mrs. Sarah Hamilton-Foyn).pdf (34.1 MB) |

| | |
|---|---|
| **Respondent Name** | Phill Bamford - Gladman Developments Ltd |
| **Comment ID** | 15612065/1180 |
| **Document Part Name** | Question 08 - Extra Care Housing |
| **Comment** | **4.3 Question 8 – Extra Care Housing:**<br><br>4.3.1 There is a critical need for Extra Care Housing to meet the needs of an ageing population. The Council state that they intend to require Affordable Housing provision no matter whether an Application is deemed to be in Use Class C2 or C3. This is considered to be counterproductive as the provision of Affordable Housing in a C2 Extra Care scheme will significantly affect the viability of the scheme and may stop schemes from coming forward.<br><br>4.3.2 Whilst Gladman accept that not all 'care schemes' should be classed as C2, a blanket approach to the provision of Affordable Housing would result in Affordable Housing being required on schemes which are already being delivered in order to address a specific specialist need. This is considered unacceptable and should not be referred to in any Extra Care Policy in the SGLP. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | IM Land Ltd and The Davison Family |
| **Comment ID** | 19925889/1292 |
| **Document Part Name** | Question 08 - Extra Care Housing |
| **Comment** | Please see enclosed Representations Report on behalf of IM Land Ltd and The Davison Family prepared by Peter Brett Associates dated 30th April 2018. |
| **Attached documents** | IM Land Ltd and The Davison Family - Peter Brett Associates (Mr. Colin Danks).pdf (673 KB) |

| | |
|---|---|
| **Respondent Name** | Pat Hinton |
| **Comment ID** | 19780353/1301 |
| **Document Part Name** | Question 08 - Extra Care Housing |
| **Comment** | As I am writing as inhabitant, I read with interest that South Glos has an ageing population and life expectancy higher than the national average. I do not think this is reflected in the Plans for the next eighteen years. Older people need access to smaller housing, better Social and Medical Care facilities and better Public Transport. I don't think enough is planned for the older population.<br><br>The above are just a few thoughts from resident which I hope can be considered. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Fear Group |
| **Comment ID** | 19927745/1427 |
| **Document Part Name** | Question 08 - Extra Care Housing |
| **Comment** | As noted under the heading above on Policy Discussion Points – General, we request that Policy provision is included in the new Local Plan to ensure provision of a diversity of housing types. This should include a range of types to meet the needs of older people, including Extra Care but also other forms of housing suited to a variety of older persons' needs. |

| | |
|---|---|
| | The Consultation Document notes that there has been variation in Planning Decisions on the classification of Extra Care but that these have leaned towards C2 Classification. Often age restrictions on occupation and the provision of a certain level of care as part of the tenancy have been determining factors in cases where Extra Care has been found to be a C2 use and not C3. A key consideration in relation to delivering accommodation for older people that includes care support is viability, given that Extra Care schemes, for example, need to provide care facilities and space for other shared services and facilities. Currently the NPPF, at Paragraph 173, sets out the need for Local Plan Policies to ensure that the cost of any requirements, after taking account of normal development costs and mitigation, provide competitive returns to a willing landowner and willing developer, to enable development to be deliverable. The Draft Revised NPPF that is currently being Consulted upon by the Government is more succinct in stating (Paragraph 34) that Policy requirements on development contributions *'..... should not make development unviable and should be supported by evidence to demonstrate this.'* The Draft also more clearly states that it is primarily at the Plan making stage that viability should be assessed, requiring that local Policies *'..... should set out any circumstances where further Viability Assessment may be required in determining individual Applications.'*<br><br>The proposed new NPPF is supported by Draft Planning Policy Guidance and this states that *'*The role for V*iability Assessment is primarily at the Plan making stage'* and *'the use of Viability Assessment at the decision-making stage should not be necessary.'*<br><br>It will therefore be essential in developing the new Local Plan, in addition to considering the issues around C2/C3 Classification, that viability impact is assessed to ensure that any requirements for Affordable Housing do not make development of Extra Care, or other forms of housing for older people, unviable and that this is supported by evidence. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sue Hope |
| **Comment ID** | 411169/1519 |
| **Document Part Name** | Question 08 - Extra Care Housing |
| **Comment** | I support the requirement for Extra Care Housing to include an affordable element. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hannah Saunders - Dodington Parish Council |
| **Comment ID** | 19931969/1614 |
| **Document Part Name** | Question 08 - Extra Care Housing |
| **Comment** | **COMMENTS:**<br><br>Members feel approach to the Use Class definitions is a good idea as the Policy must have a range of options to suit people of all financial circumstances and health situations – and this is a good way to address that. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | G. E. Forward |
| **Comment ID** | 20176577/1716 |
| **Document Part Name** | Question 08 - Extra Care Housing |
| **Comment** | With an older population this will be a necessity. A proper Plan will be needed. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David Jonathan Redgewell - South Gloucestershire Disability Forum, Bus User U... |
| **Comment ID** | 20209409/1915 |
| **Document Part Name** | Question 08 - Extra Care Housing |
| **Comment** | Questions 8, 9, and 10.<br><br>Welcome Policy PSP37.<br><br>Policy M42 M42,<br><br>Lifetime home standards.<br><br>But we are very concerned about the Wider Bristol SHMA 2016 and the need to review Wheelchair adapted standards in Lifetime homes. There is a shortage of Wheelchair accessible Homes for younger people in South Gloucestershire in rural vilages. |

| | |
|---|---|
| | Welcome Affordable Housing in Extra Care Housing development but needs for Housing are not being addressed for young disabled people under 55.<br><br>An investigation is welcomed for Internal Space and Accessibility Standard of dwelling is being address but this appears not to comply with the Equalities Act 2010 and is discrimination of protected caretakers.<br><br>We need to address the need of young disabled people in the market housing system not Just the over 55s and 85s.<br><br>It is important to address this issue. We welcome a discussion with the Council on Design Standards for Wheelchair users and those with mobility issues. The ISSUE needs to be addressed within the private rented market as well as within the social rented market.<br><br>Also with a Larger retirement population in South West England, Greater Bristol, and rural South Gloucestershire.<br><br>The NPPF requires a Local Plan and Affordable Housing must meet option Building Regulation part ML(3).<br><br>Question 9 - View is clear. South Gloucestershire is not providing enough Affordable Housing with access needs.<br><br>Welcome retaining policy PSP37. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | McCarthy and Stone Retirement Lifestyles Ltd |
| **Comment ID** | 20182209/1918 |
| **Document Part Name** | Question 08 - Extra Care Housing |
| **Comment** | Dear Sirs,<br><br>It has been brought to my attention that you recently Consulted on the South Gloucestershire new Local Plan. Unfortunately my Client, McCarthy and Stone was not included on the Consultation Database despite having taken part in previous Workshops with the Council on this topic and so was unaware that the Consultation was underway. I have since requested to be added to this Database on behalf of McCarthy and Stone.<br><br>As the market leader in the provision of sheltered housing for sale to the elderly, McCarthy and Stone Retirement Lifestyles Ltd considers that with its extensive experience in providing development of this nature, it is well placed to provide informed Comments on the aforementioned Document insofar as it affects or relates to housing for the elderly.<br><br>For your convenience, please find below our Comments with regards to the Consultation. I would ask that though the Consultation has closed that these Comments are considered so that the delivery of Extra Care housing, and other forms of specialist housing for the elderly are not affected by the proposed amendments to Planning Policy in South Gloucestershire.<br><br>Dear Sir/Madam,<br><br>**McCARTHY & STONE RETIREMENT LIFESTYLES LTD.**<br><br>**RESPONSE TO CONSULTATION ON THE SOUTH GLOUCESTERSHIRE LOCAL PLAN CONSULTATION 2018:**<br><br>Thank you for the opportunity to Comment on the Consultation Papers for the aforementioned Document. As the market leader in the provision of sheltered housing for sale to the elderly, McCarthy and Stone Retirement Lifestyles Ltd considers that with its extensive experience in providing development of this nature it is well placed to provide informed Comments on the Local Plan Consultation, insofar as it affects or relates to housing for the elderly.<br><br>Question 8, 'Extra Care Housing' asked the following Question: Do you have any views on our proposed approach to the Use Class definitions in our Extra Care Housing Policy? And Question 9 asked the following qQestion: Do you have any views on the intended approach to Affordable Housing?<br><br>We have the following Comment to these two Questions:<br><br>Most forms of Extra Care Accommodation fall within Use Class C2 and Appeal precedent has confirmed that self-containment of accommodation is not the determining factor as to Use Class. Where Extra Care accommodation falls under Use Class C2 it should not be liable for Affordable Housing.<br><br>Extra Care accommodation covers a very wide spectrum of care and support provision and it is well recognised that dependent on the care and support it provides and the facilities that come with it, can fall within either the C2 or C3 Use Class, which will determine in the majority of cases whether or not a Council will seek Affordable Housing contributions from the development. This is a complex issue and there are a number of |

factors that determine whether or not an Extra Care development is within Use Class C3 or Use Class C2. However a recent Appeal Decision (APP/U1105/W/17/3177340, The Knowle, Station Road, Sidmouth, Devon, EX10 8HL dated 22nd January 2018) is very helpful in this regard in succinctly highlighting how the issue ought to be approached. Paragraph 37 states:

*The RTPI Good Practice Note 8 and Housing LIN5 deal specifically with Extra Care Housing and offer some guidance on possible distinctions between C2 and C3 Extra Care accommodation. These principles can be applied to the Appeal proposal. Key to the distinction is the extent to which communal services are provided and the extent to which care is available to meet the needs of residents.*

*In concluding that in that case, the proposal fell within Use Class C2, the Inspector concluded at Paragraphs 49 and 50:*

*For all of these reasons, it is clear to me that the development is offering much more than a dwelling house. Independent living accommodation is one element of the scheme but that would be provided alongside a range of communal facilities that are inextricably linked to an expected way of life. The scheme is designed to meet the needs of the target occupants and facilitate assisted living as well as social well-being and interaction with the outside world. Care would also be provided, specifically tailored to the needs of the occupant. Whilst some primary occupants of the development might, upon taking up residence, require only the minimum level of personal care there is likely to be a mix of care needs at any one time and those with limited need may well require additional care in the future.*

*I can see no justification for disaggregating different elements of the proposal or seeking to separate the individual apartments from the remainder of the scheme.*

It is submitted that the issue is very much one of Development Management and clearly that each scheme needs to be considered on its own circumstances (as was the case at Sidmouth). If however, it continues to be, it is clear that any Policy, commentary or guidance must provide sufficient flexibility to allow for consideration of the specific circumstances of each scheme.

Delivering beneficial Sheltered Housing and Extra Care Accommodation should be prioritised in South Gloucestershire to meet its identified housing needs and not unnecessarily confused or complicated by erroneous and misleading statements.

It is well established that it is inappropriate to mix specialist housing for the elderly with other (family/younger persons) housing in a single flatted block. Given the nature of the District, that is where most, if not all the new stock will come from.

Well located and designed specialist housing for older home owners is a highly sustainable form of housing. Given the critical need for older person's accommodation in South Gloucestershire there should be a presumption in favour of sustainable housing and in particular specialist housing which is being proposed on suitable sites. It is recommended that greater weight is attached to this approach alongside the desire to release residential land within strategic allocations or indeed a separate Policy within the Document to cover the housing need for the ageing population. This accommodation will come from a number of sources both public and private and with varying levels of care and shelter provision enabling individual people to remain in their own home with independence and security. In effect there should be more of a positive Policy supporting older people's accommodation in the same way that Affordable Housing is given a high priority.

The National Planning Policy Framework stipulates that the Planning System should be *'supporting strong, vibrant and healthy communities' and highlights the need to 'deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive mixed communities. Local Planning Authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community.... such as.... older people'* (emphasis added).

The National Planning Practice Guidance reaffirms this in the guidance for assessing housing need in the Plan making process entitled ***"How should the needs for all types of housing be addressed?*** *(Paragraph: 021 Reference ID: 2a-021-20140306) and a separate subsection is provided for* ***"Housing for older people."*** *This stipulates that "the need to provide housing for older people is critical given the projected increase in the number of households aged 65 and over accounts for over half of the new households (Department for Communities and Local Government Household Projections 2013). Plan makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to move. This could free up houses that are under-occupied. The age profile of the population can be drawn from Census data. Projections of population and households by age group should also be used. The future need for older persons housing broken down by tenure and type (e.g. Sheltered, enhanced sheltered, Extra Care, registered care) should be assessed and can be obtained from a number of online tool kits provided by the sector. The assessment should set out the level of need for residential institutions (Use Class C2). But identifying the need for particular types of general housing, such as bungalows, is equally important" (My emphasis).*

*The 'Housing White Paper: Fixing our broken housing market' clearly signals that greater consideration must be given to meeting the needs of older persons' in Local Plans stipulating that:*

*'Offering older people a better choice of accommodation can help them to live independently for longer and help reduce costs to the Social Care and health systems. We have already put in place a Framework linking Planning Policy and Building Regulations to improve delivery of accessible housing. To ensure that there is more consistent delivery of accessible housing, the Government is introducing a new statutory duty through the Neighbourhood Planning Bill on the Secretary of State to produce guidance for Local Planning Authorities on how their local development Documents should meet the housing needs of older and disabled people. Guidance produced under this duty will place clearer expectations about Planning to meet the needs of older people, including supporting the development of such homes near local services82. It will also set a clear expectation that all Planning Authorities should set Policies using the Optional Building Regulations to bring forward an adequate supply of accessible housing to meet local need. In addition, we will explore ways to stimulate the market to deliver new homes for older people' (Para 4.42) (My emphasis).*

*In line with the rest of the country, the Plan demonstrates an acceptance that the demographic profile of the Authority is projected to age. The largest proportional increases in the older population are expected to be of the 'frail' elderly, those aged 85 and over, who are more likely to require specialist care and accommodation provided by Extra Care accommodation. It is therefore clear that the provision of adequate support and accommodation for the increasingly ageing demographic profile of the Spatial area is a significant challenge.*

*Unless properly planned for, there is likely to be a serious shortfall in specialist accommodation for the older population in South Gloucestershire, which will have a knock on effect in meeting the housing needs of the whole area and wider Policy objectives. Specialist accommodation for the elderly, such as that provided by McCarthy and Stone, will therefore have a vital role in meeting the area's housing needs.*

| | |
|---|---|
| | *We consider that the best approach towards meeting the diverse housing needs of older people is one that encourages both the delivery of specialist forms of accommodation such as sheltered/retirement housing and Extra Care accommodation.*<br><br>*When selecting sites for elderly persons' accommodation careful consideration is given to locational criteria including: Topography, Environment (including safety and security), Mobility, Services and Community Facilities. As such, suitable sites for specialist accommodation for the elderly are difficult to find and tend to be located within, or adjacent to town or local centres. It is therefore highly unlikely that the majority of development sites will be suitable for specialist accommodation for the elderly, particularly on urban extension sites where access to goods and services may be limited. Having said that, when new local centres are being created these may also provide an appropriate location for retirement housing developments.*<br><br>*Specialist accommodation for the elderly also usually provides an element of care and communal facilities at an additional cost to the developer. This requires a critical mass of residents in order to be feasible and small scale developments of specialist housing for the elderly could not be realistically asked to provide or maintain such facilities. It is therefore unlikely to expect the provision of specialist accommodation for the elderly to be met piecemeal in general needs housing developments.*<br><br>*We would like to highlight the advice provide in the Housing in Later Life: Planning Ahead for Specialist Housing for Older People toolkit. This toolkit was developed by a Consortium of private and* public organisations *with an interest in housing for the elderly and encourages a joined up approach to Planning, Housing and Social Care Policy both in the collection of evidence and the development of specialist accommodation for the elderly. A copy of this Document has been appended for your convenience. Whilst we appreciate that no one Planning approach will be appropriate for all areas, an example Policy is provided that, we hope, will provide a useful reference for the Council:*<br><br>*"The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations.*<br><br>*The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances and to actively encourage developers to build new homes to the 'Lifetime Homes' Standard so that they can be readily adapted to meet the needs of those with disabilities and the elderly as well as assisting independent living at home. The Council will, through the identification of sites, allowing for windfall developments, and/or granting of Planning Consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities."*<br><br>*Well located and designed specialist housing for older home owners is a highly sustainable form of housing. Given the critical need for older person's accommodation in South Gloucestershire there should be a presumption in favour of sustainable housing and in particular specialist housing which is being proposed on suitable sites. It is recommended that greater weight is attached to this approach alongside the desire to release residential land within strategic allocations or indeed a separate Policy within the Document to cover the housing need for the ageing population. This accommodation will come from a number of sources both public and private and with varying levels of care and shelter provision enabling individual people to remain in their own home with independence and security. In effect there should be more of a positive Policy supporting older people's accommodation in the same way that Affordable Housing is given a high priority.*<br><br>*I trust that the above Comments will be considered in the evolution of any emerging Consultation Document and that we will continue to be invited to Comment as the Document progresses.* |
| **Attached documents** | McCarthy and Stone Retirement Lifestyles Ltd - The Planning Bureau Limited (Carla Fulgoni).pdf (213 KB) |

| | |
|---|---|
| **Respondent Name** | South West HARP Planning Consortium |
| **Comment ID** | 16478465/2004 |
| **Document Part Name** | Question 08 - Extra Care Housing |
| **Comment** | **Question 8: E. Extra Care Housing:**<br><br>It is important not only for the Council but for all its development partners to maximise the delivery of Affordable Housing of all types and to meet all needs across South Gloucestershire. The delivery of specialist housing and care to meet the needs of older people who require Affordable Housing is important, and its delivery as part of mixed and balanced communities needs to be secured through robust and properly tested Planning Policy which will be effective over the long term. As key delivery partners, our members support the aims of the Council in maximising opportunities for the delivery of affordable Extra Care housing.<br><br>It is right that the review of the Local Plan reconsiders the approach set out in detail within the Affordable Housing and Extra Care Housing SPD, as that Document is now quite dated, and its approach superseded by numerous Appeal Decisions. All of the Policies that are now subject to review and amendment should be subject to an appropriate level of Viability Testing to ensure the impacts of seeking Affordable Housing contributions and all other Policy expectations can be viably delivered; in seeking to require an Affordable Housing on or off-site contribution the Council must set out a clear definition of Extra Care housing and robustly test that requirement, as expected by the NPPF and PPG:<br><br>*"34. … Such Policies should not make development unviable and should be supported by evidence to demonstrate this. Plans should also set out any circumstances in which further Viability Assessment may be required in determining individual Applications."*<br><br>[Draft NPPF, 2018]<br><br>*"The evidence which accompanies an Emerging Local Plan should show how the Policies in the Plan have been tested for their impact on the viability of development"*<br><br>[Paragraph: 018 Reference ID: 12-018-20140306]<br><br>We ask that the Council continue to engage directly with all parties involved in developing across South Gloucestershire, including its Registered Provider partners as part of the next stage of Viability Testing. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sebastian Loyn - YTL Developments (UK) Limited |
| **Comment ID** | 19779841/2078 |
| **Document Part Name** | Question 08 - Extra Care Housing |
| **Comment** | E: Extra Care:<br><br>YTL welcome the clarification on the affordable requirement based around the nature of the facility rather than its Use-class. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | CEG and The Charfield Landowners Consortium |
| **Comment ID** | 16664993/2218 |
| **Document Part Name** | Question 08 - Extra Care Housing |
| **Comment** | **E: Extra Care Housing:**<br><br>The Consultation Document here focuses on the definition of 'Extra Care Housing,' and the Council's proposed approach to Affordable Housing contributions from such development. It is noted that an Affordable Housing contribution will be required within Extra Care housing schemes where it meets the definition of:<br><br>*'Being [a] single self-contained unit of occupation used as a single dwelling for an individual household (regardless of whether C2 or C3).'*<br><br>This definition and approach does not take account of different levels of care which are provided by different schemes and operators. Our Client would caution against taking a blanket approach which would not recognise these differences or take account of viability. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Fortannia Ltd |
| **Comment ID** | 19741217/2331 |
| **Document Part Name** | Question 08 - Extra Care Housing |
| **Comment** | **Qu.8 E Extra Care Housing. Do you have any views on our proposed approach to the Use Class definitions in our Extra Care Housing Policy?**<br><br>The delivery of Affordable Housing should not adversely affect the prompt delivery of other forms of housing. It is sensible for this approach to be reviewed following further progress of the JSP and publication of the Revised NPPF/NPPG later this year. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Margaret Pinder - Sustainable Thornbury |
| **Comment ID** | 19372321/63 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | We agree the new criterion. We would like to propose that there should be a requirement for high energy insulation specification to ensure continued affordability of housing for those in Social and other Affordable Housing. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mayers |
| **Comment ID** | 16271713/96 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | The Affordable Housing should be near the City Centre where most people work who are on low incomes. The Green Belt should not be used and the villages should be left alone, there is enough Brownfield about to build your required housing needs. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anne Gale |
| **Comment ID** | 16344321/129 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | Affordable! Really! What you class 'affordable' is usually way out of the pocket of the average family! |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Martin Gillian |
| **Comment ID** | 19445537/150 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | I believe that the definition of affordable sets the bar too high in 'expensive' villages. I also have concerns that developers are able to buy their way out of provision of Affordable Housing. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christopher Tippetts |
| **Comment ID** | 19452065/179 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | Time and time again the developers are allowed, after being given Outline Planning Permission, to renegotiate the number of Social Housing units to a lesser figure. This results in an area being swamped with a large number of 3 and 4 bedroom properties being built which means local people on low incomes don't stand a chance of purchasing or renting a Social Housing unit. Therefore SGC are never reaching their target provision for Social Housing. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Lyn Haigh - Rangeworthy Parish Council |
| **Comment ID** | 2301601/188 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | The threshold for triggering Affordable Housing should be reduced back to a maximum of 5 dwellings. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Philip Box |
| **Comment ID** | 19453025/200 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | Affordable Housing should not be excluded from concerns such as quality of design and the impacts of housing on Biodiversity. Affordable Housing should be bound by the same imperatives, to ensure high quality design in keeping with the local area, and the highest possible environmental standards, including substantial "net gain from nature" in new developments. It should play its part in efforts to , the substantial decline in UK native species at the centre of the UK's current Biodiversity Action Plan and 25 Year Plan for nature, as evidenced by the State of Nature Report from the RSPB et al. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Carolyn Baker |
| **Comment ID** | 17252193/212 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | It is imperative that property developers are not allowed to challenge/reduce the proportion of Affordable Housing included on their sites on the grounds of profitability. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Helen Johnstone - Stroud District Council |
| **Comment ID** | 14317537/257 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | 1. The text doesn’t set out the current Policy threshold or the proposed revision, so it is difficult to Comment. However, given the growing need for Affordable Housing, the re-examination of thresholds makes sense in terms of maximising Affordable Housing opportunities. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Claire Young |
| **Comment ID** | 916289/343 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | As I stated in my JSP Response, given the current affordability crisis in South Gloucestershire, I believe the percentage of Affordable Housing required should be increased. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christina Biggs - Friends of Suburban Bristol Railways |
| **Comment ID** | 19467329/381 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | We concur with the Mayor of Bristol, Marvin Rees, and also Cllr Pat Hockey, that the most urgent need in the West of England is for Affordable Housing within reach of Public Transport - not just bus but rail. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Simmons - Westerleigh Parish Council |
| **Comment ID** | 17221409/409 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **9F. Affordable Housing:**<br><br>**Do you have any views on the intended approach to Affordable Housing?**<br><br>**WPC support the intended approach on Affordable Housing.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Rentplus UK Ltd |
| **Comment ID** | 19783457/424 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | We represent **Rentplus UK Ltd**, an innovative company providing affordable rent to buy housing for working people aspiring to home ownership with an accessible route to achieve their dream through the rent - save - own model.<br><br>We have previously responded to the West of England Joint Spatial Plan Consultations and are writing in response to this Consultation to draw attention to the emerging national Policy position as set out in the draft proposed changes to the NPPF, also out for Consultation at present. As the main Policy reference for new developments, it is important that the review of the Local Plan reflects the Government's Policy approach to ensure long term effectiveness.<br><br>**Part 3 - Policy Discussion Points:**<br><br>**F. Affordable Housing:**<br><br>In response to Question 9, the Council's intention to review and replace CS18 to take account of the Government's wider definition of Affordable Housing is supported. The publication of a full revised text of the NPPF has fallen at a useful time for the review of the Council's Planning Policy, following on from a number of significant national Consultations conducted over the past couple of years. The Government has indicated that it intends to implement the draft changes later this year and while the Draft NPPF includes transition arrangements as the majority of the changes, and in particular those relating to Affordable Housing, are not new ideas and the Plan is still in the early stages of production now is a prime opportunity to absorb those proposals and reflect these in the new Policies. This will ensure that the Plan will remain effective and consistent with national Policy in the long term, and not require further early review.<br><br>The definition of affordable housing within Annex 2 is one of the critical changes to the NPPF, including rent to buy within a new category of 'other affordable routes to home ownership.' This recognises the need to help working households save for a deposit while paying below-market rents, a tenure that is becoming increasingly important at a time when affordability is so stretched locally. South Gloucestershire's affordability ratio is 10.1, with mean monthly private sector rents identified as  and average house prices of  within the 2017/18 NHF Home Truths South West Report. While not as high as neighbouring Bath and North East Somerset or Bristol, these figures highlight how prohibitively expensive access to housing has become.<br><br>Part (d) of the proposed definition of Affordable Housing is set out below:<br><br>d) **Other affordable routes to home ownership:** is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative Affordable Housing provision or refunded to Government or the relevant Authority specified in the funding agreement.<br><br>It is important that the Council seek to ensure that Affordable Housing is accessible to those who cannot meet their housing needs in the market; rent to buy addresses the primary barrier to home ownership by tackling the lack of a mortgage deposit. This is achieved through a combination of a secure affordable rented period (whichever is the lower of 80% of open market rent, including any service charge, or Local Housing Allowance), giving time to save, and a 10% gifted deposit to enable tenants to buy their own home in 5, 10, 15 or 20 years. The specific Rentplus model is not delivered at an intermediate rent, as set out in the Draft NPPF definition, but this enables the model to be more responsive to local needs, and to be more accessible and affordable to working households. The expanded definition of Affordable Housing should be introduced in the update to CS18, including support for rent to buy to enable more local people to access an affordable route to home ownership.<br><br>It is also important as part of the review of CS18 that the proposed changes respond to the proposed requirement for *at least* 10% of the homes on major developments to be delivered as an affordable route to home ownership. In the context of the South Gloucestershire Local Plan this would fit |

| | |
|---|---|
| | well with the requirement for Affordable Housing in urban areas, but may need imposition of a second tier in relation to rural areas where the current approach is set at 5 dwellings. The Policy should be reviewed to incorporate this requirement and the exemption where *"this would exceed the level of Affordable Housing required in the area, or significantly prejudice the ability to meet the identified Affordable Housing needs of specific groups"* (Paragraph 65).<br><br>We would like to be notified at the next stage of Consultation on the Local Plan, by email only to . Please ensure that Rentplus is retained on the Consultation Database, with Tetlow King Planning listed as their Agents. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alveston, Rudgeway, and Earthcott Parish Council |
| **Comment ID** | 19784545/440 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **Yes – should provide more of it!** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Donna Ford - Iron Acton Parish Council |
| **Comment ID** | 1060385/466 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **Affordable Housing:**<br><br>Iron Acton Parish Council welcomes South Gloucestershire's commitment: to requiring at least 35% Affordable Housing in all new housing developments; to review Policy on thresholds in the light of the high level of need locally; and to require arguments on viability (often used to reduce the proportion of Affordable Homes) to be part of Applications and in the public domain. It welcomes, too, the proposal to require affordable dwellings to be integrated with the overall design and layout of the development and as far as possible indistinguishable from market dwellings in line with National Planning Policy Framework provisions. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | J. Bond |
| **Comment ID** | 17779105/479 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | Housing should still be of a construction and appearance sympathetic to the existing buildings in the neighbourhood.<br><br>Not forgetting the adverse effects on health of noise pollution, and the need for adequate sound insulation.<br><br>"Affordable" should be a relative term appropriate to the context of the local area.<br><br>8% of Affordable Housing to be wheelchair accessible is inadequate, given the ageing population and that the affordable quota is only 35% anyway.<br><br>8% of 35% is 2.8%. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christine Hunter |
| **Comment ID** | 19809025/491 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **Affordable Housing:**<br><br>I welcome South Gloucestershire's commitment to requiring at least 35% Affordable Housing in all new housing developments and to reviewing Policy on thresholds for provision of Affordable Housing (in the light of the high level of need locally). The proposal to require arguments on viability (often used to reduce the proportion of Affordable Homes) to be part of Applications and in the public domain should help ensure higher proportions of Affordable Housing than in recent years. I welcome, too, the proposal to require Affordable Homes to be integrated with the overall design and layout of the development and as far as possible indistinguishable from market dwellings so that their occupants are not stigmatised. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alan Jones - Hanham District Green Belt Conservation Society |
| **Comment ID** | 17236353/512 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | How will the currently under provided demand for this accommodation be met, by relying solely on allocation from other developments?<br><br>Without enforceable definition and policing of the delivery of truly Affordable Homes, the result will be, as currently experienced - that any initial aspirations to provide reasonable percentages of affordable accommodation, will be whittled down to meaningless levels.<br><br>SGC's own Core Strategy 18 - Affordable Homes, the latest SGC Authority Monitoring Report 2016 states the necessity to construct 903 units per annum in order to meet the then demand, without making in-roads into any backlog.<br><br>In order to achieve this from allocations from housing developments alone, assuming for a moment the 35% contribution on development sites is achieved, there is a need to construct a minimum of 2,580 units a year within South Gloucestershire - A considerably greater number than the completion of 1,107 units!! |
| **Attached documents** | Hanham District Green Belt Conservation Society (Alan Jones).pdf (20.3 MB) |

| | |
|---|---|
| **Respondent Name** | Roy Crew |
| **Comment ID** | 3973121/539 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | My Responses to the specific Local Plan Questions:<br><br>Question 9:<br><br>There is a lot of high value housing in the Hanham area, the Council should concentrate on providing a high proportion of Starter Homes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Paul Chapman - Iron Acton Parish Council |
| **Comment ID** | 19809537/557 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **Affordable Housing:**<br><br>I welcome South Gloucestershire's commitment to requiring at least 35% Affordable Housing in all new housing developments and to reviewing Policy on thresholds for provision of Affordable Housing (in the light of the high level of need locally). The proposal to require arguments on viability (often used to reduce the proportion of Affordable Homes) to be part of Applications and in the public domain should help ensure higher proportions of Affordable Housing than in recent years. I welcome, too, the proposal to require Affordable Homes to be integrated with the overall design and layout of the development and as far as possible indistinguishable from market dwellings so that their occupants are not stigmatised. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David Hatherell |
| **Comment ID** | 19830849/572 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **Affordable Housing:**<br><br>I welcome South Gloucestershire's commitment to requiring at least 35% Affordable Housing in all new housing developments and to reviewing Policy on thresholds for provision of Affordable Housing (in the light of the high level of need locally). The proposal to require arguments on viability (often used to reduce the proportion of Affordable Homes) to be part of Applications and in the public domain should help ensure higher proportions of Affordable Housing than in recent years. I welcome, too, the proposal to require Affordable Homes to be integrated with the overall design and layout of the development and as far as possible indistinguishable from market dwellings so that their occupants are not stigmatised. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | John O'Donnell |
| **Comment ID** | 18604385/583 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **Affordable Housing:** |

| | |
|---|---|
| | I welcome South Gloucestershire's commitment to requiring at least 35% Affordable Housing in all new housing developments and to reviewing Policy on thresholds for provision of Affordable Housing (in the light of the high level of need locally). The proposal to require arguments on viability (often used to reduce the proportion of Affordable Homes) to be part of Applications and in the public domain should help ensure higher proportions of Affordable Housing than in recent years. I welcome, too, the proposal to require Affordable Homes to be integrated with the overall design and layout of the development and as far as possible indistinguishable from market dwellings so that their occupants are not stigmatised. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Joseph Hatherell |
| **Comment ID** | 19831681/594 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **Affordable Housing:**<br><br>I welcome South Gloucestershire's commitment to requiring at least 35% Affordable Housing in all new housing developments and to reviewing Policy on thresholds for provision of Affordable Housing (in the light of the high level of need locally). The proposal to require arguments on viability (often used to reduce the proportion of Affordable Homes) to be part of Applications and in the public domain should help ensure higher proportions of Affordable Housing than in recent years. I welcome, too, the proposal to require Affordable Homes to be integrated with the overall design and layout of the development and as far as possible indistinguishable from market dwellings so that their occupants are not stigmatised. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Daphne Dunning - Cromhall Parish Council |
| **Comment ID** | 16475073/608 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | 9.<br><br>It is evident that more Affordable Housing is needed but more specifically than that many of the smaller village developments need to consist of more 1 and 2 bed homes not just 5-bedroom luxury properties. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christine Eden - Marshfield Community Land Trust |
| **Comment ID** | 14404353/621 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **Q9 Do you Have any Views on the Intended Approach to Affordable Housing?**<br><br>MCLT supports SGC's recognition of the high level of Affordable Housing need and agrees that SGC should, 'due to the high level of Affordable Housing need in the District, review the Policy position on thresholds for Affordable Housing.' There should also be stringent enforcement of the delivery of the Affordable Housing element of Planning Approvals, plus some mechanism (e.g. via a CLT) to ensure that the housing retains its affordable status in perpetuity.<br><br>We agree with the statement that any Affordable Housing development should be 'integrated with the design and layout principles of the development as a whole, so that the tenure is, as far as possible, indistinguishable from the market dwellings.' |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Jane Driver |
| **Comment ID** | 5134785/627 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **Affordable Housing:**<br><br>I welcome South Gloucestershire's commitment to requiring at least 35% Affordable Housing in all new housing developments and to reviewing Policy on thresholds for provision of Affordable Housing (in the light of the high level of need locally). The proposal to require arguments on viability (often used to reduce the proportion of Affordable Homes) to be part of Applications and in the public domain should help ensure higher proportions of Affordable Housing than in recent years. I welcome, too, the proposal to require Affordable Homes to be integrated with the overall design and layout of the development and as far as possible indistinguishable from market dwellings so that their occupants are not stigmatised. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Diana Porter-Smith |

| | |
|---|---|
| **Comment ID** | 10874433/638 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **Affordable Housing:**<br><br>I welcome South Gloucestershire's commitment to requiring at least 35% Affordable Housing in all new housing developments and to reviewing Policy on thresholds for provision of Affordable Housing (in the light of the high level of need locally). The proposal to require arguments on viability (often used to reduce the proportion of Affordable Homes) to be part of Applications and in the public domain should help ensure higher proportions of Affordable Housing than in recent years. I welcome, too, the proposal to require Affordable Homes to be integrated with the overall design and layout of the development and as far as possible indistinguishable from market dwellings so that their occupants are not stigmatised. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Michael Keenan |
| **Comment ID** | 2796353/650 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **Affordable Housing:**<br><br>I welcome South Gloucestershire's commitment to requiring at least 35% Affordable Housing in all new housing developments and to reviewing Policy on thresholds for provision of Affordable Housing (in the light of the high level of need locally). The proposal to require arguments on viability (often used to reduce the proportion of Affordable Homes) to be part of Applications and in the public domain should help ensure higher proportions of Affordable Housing than in recent years. I welcome, too, the proposal to require Affordable Homes to be integrated with the overall design and layout of the development and as far as possible indistinguishable from market dwellings so that their occupants are not stigmatised. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Welbeck Strategic Land LLP |
| **Comment ID** | 19840833/659 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | C. RESPONSE TO THE QUESTIONS<br><br>15. In the interest of brevity and succinctness, this Section only responds to the Questions of relevance to the current proposals for Cleve Park.<br><br>Question 9 - Do you Have Any Views on the Intended Approach to Affordable Housing?<br><br>26. There is a significant need for market and Affordable Housing within South Gloucestershire and it should be a key priority as the Draft JSP and new SGLP move forward. The Draft JSP sets out that the Affordable Housing target for the West of England for the Plan Period (2016 - 2036) is 24,500 net new affordable dwellings.<br><br>27. The new SGLP states that the new Local Plan Policy on Affordable Housing will need to be consistent with the JSP.<br><br>28. We agree with Policy 3 of the JSP that on residential developments delivering 5 or more dwellings or sites larger than 0.2ha, whichever is the lower, should provide a minimum target of 35% Affordable Housing to be delivered on site. However as detailed above this should not apply to C2 residential developments for older persons and student accommodation.<br><br>29. We consider it appropriate to amend the Affordable Housing Policy to include a revised viability procedure, to ensure Applicants include evidence with an Application that is made publically available. However we do not consider it necessary for Applications where the Affordable Housing requirement can be met, to offer viability evidence. This is in line with national aspirations moving forward as set out in the Draft National Planning Policy Framework at Paragraph 58 that states:<br><br>"Where proposals for development accord with all the relevant Policies in an up-to-date Development Plan, no Viability Assessment should be required to accompany the Application. Where a Viability Assessment is needed, it should reflect the recommended approach in national Planning Guidance, including standardised inputs, and should be made publically available."<br><br>30. The proposed development at Cleve Park will provide 35% Affordable Housing units (123) and 65% Market Housing, including the 14 self-build units (227) in accordance with Policy CS18 of the adopted Core Strategy and Policy 3 of the Draft JSP.<br><br>31. The affordable provision will be split between 80% rented dwellings and 20% intermediate tenure in accordance with the Strategic Housing Market Assessment (2009), unless some other tenure split is agreed with the Council.<br><br>32. This is a significant amount of Affordable Housing, and will positively contribute to the aspirations of the new SGLP regardless of whether the Affordable Housing Policy is amended. |
| **Attached documents** | Welbeck Strategic Land LLP - Dominic Lawson Bespoke Planning (Harriet Swale).pdf (1.4 MB) |

| | |
|---|---|
| **Respondent Name** | Richard Hunter |
| **Comment ID** | 12513441/665 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **Affordable Housing:**<br><br>I welcome South Gloucestershire's commitment to requiring at least 35% Affordable Housing in all new housing developments and to reviewing Policy on thresholds for provision of Affordable Housing (in the light of the high level of need locally). The proposal to require arguments on viability (often used to reduce the proportion of Affordable Homes) to be part of Applications and in the public domain should help ensure higher proportions of Affordable Housing than in recent years. I welcome, too, the proposal to require Affordable Homes to be integrated with the overall design and layout of the development and as far as possible indistinguishable from market dwellings so that their occupants are not stigmatised. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Zoe Hancock - Bristol Avon Catchment Partnership |
| **Comment ID** | 19832225/684 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | No additional Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Rosemary White |
| **Comment ID** | 10707009/699 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | Affordable Housing:<br><br>I welcome South Gloucestershire's commitment to requiring at least 35% Affordable Housing in all new housing developments and to reviewing Policy on thresholds for provision of Affordable Housing (in the light of the high level of need locally). The proposal to require arguments on viability (often used to reduce the proportion of Affordable Homes) to be part of Applications and in the public domain should help ensure higher proportions of Affordable Housing than in recent years. I welcome, too, the proposal to require Affordable Homes to be integrated with the overall design and layout of the development and as far as possible indistinguishable from market dwellings so that their occupants are not stigmatised. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Purchase |
| **Comment ID** | 2804385/710 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **Affordable Housing:**<br><br>I welcome South Gloucestershire's commitment to requiring at least 35% Affordable Housing in all new housing developments and to reviewing Policy on thresholds for provision of Affordable Housing (in the light of the high level of need locally). The proposal to require arguments on viability (often used to reduce the proportion of Affordable Homes) to be part of Applications and in the public domain should help ensure higher proportions of Affordable Housing than in recent years. I welcome, too, the proposal to require Affordable Homes to be integrated with the overall design and layout of the development and as far as possible indistinguishable from market dwellings so that their occupants are not stigmatised. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Suzanna Keenan |
| **Comment ID** | 17805057/753 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **Affordable Housing:**<br><br>I welcome South Gloucestershire's commitment to requiring at least 35% Affordable Housing in all new housing developments and to reviewing Policy on thresholds for provision of Affordable Housing (in the light of the high level of need locally). The proposal to require arguments on viability (often used to reduce the proportion of Affordable Homes) to be part of Applications and in the public domain should help ensure higher proportions of Affordable Housing than in recent years. I welcome, too, the proposal to require Affordable Homes to be integrated with the overall design and layout of the development and as far as possible indistinguishable from market dwellings so that their occupants are not stigmatised. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Simon Whittard |

| | |
|---|---|
| **Comment ID** | 12489153/765 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **Affordable Housing:**<br><br>I welcome South Gloucestershire's commitment to requiring at least 35% Affordable Housing in all new housing developments and to reviewing Policy on thresholds for provision of Affordable Housing (in the light of the high level of need locally). The proposal to require arguments on viability (often used to reduce the proportion of Affordable Homes) to be part of Applications and in the public domain should help ensure higher proportions of Affordable Housing than in recent years. I welcome, too, the proposal to require Affordable Homes to be integrated with the overall design and layout of the development and as far as possible indistinguishable from market dwellings so that their occupants are not stigmatised, and the Affordable Housing is still aesthetically pleasing and visually comparable to the local existing and new housing. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Barratt Homes (Bristol) Ltd |
| **Comment ID** | 16640513/772 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | See attached. |
| **Attached documents** | Barratt Homes (Bristol) Ltd - Barton Willmore (Robyn Nicholl).pdf (5.6 MB) |

| | |
|---|---|
| **Respondent Name** | Heather Elgar - West of England Nature Partnership |
| **Comment ID** | 19839553/796 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | Please find below Comments from the West of England Nature Partnership (WENP) in response to the South Gloucestershire Local Plan Consultation.<br><br>For transparency, please know that Dominic Mellon (Consultant in Public Health for South Gloucestershire Council) sits on the WENP Board and thus note a declared conflict of interests. This Response reflects the aims and objectives of the Partnership and does not reflect views of individual Board members.<br><br>Question 9: Affordable Housing:<br><br>No Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Robert and Diana Pardoe |
| **Comment ID** | 10784545/812 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **Affordable Housing:**<br><br>I welcome South Gloucestershire's commitment to requiring at least 35% Affordable Housing in all new housing developments and to reviewing Policy on thresholds for provision of Affordable Housing (in the light of the high level of need locally). The proposal to require arguments on viability (often used to reduce the proportion of Affordable Homes) to be part of Applications and in the public domain should help ensure higher proportions of Affordable Housing than in recent years. I welcome, too, the proposal to require Affordable Homes to be integrated with the overall design and layout of the development and as far as possible indistinguishable from market dwellings so that their occupants are not stigmatised. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Brian Hackland |
| **Comment ID** | 8354337/829 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **Affordable Housing:**<br><br>Social rented housing is in particularly short supply in South Gloucestershire, alongside other forms of Affordable Housing. I welcome South Gloucestershire's commitment to requiring at least 35% Affordable Housing in all new housing developments and to reviewing Policy on thresholds for provision of Affordable Housing (in the light of the high level of need locally). The proposal to require arguments on viability (often used to reduce the proportion of Affordable Homes) to be part of Applications and in the public domain should help ensure higher proportions of Affordable Housing than in recent years. I welcome, too, the proposal to require Affordable Homes to be integrated with the overall design and layout of the development and as far as possible indistinguishable from market dwellings so that their occupants are not stigmatised. Should the current planned revision of the National Planning Policy Framework remove specific reference to "social rented housing" South Gloucestershire |

| | |
|---|---|
| | should ensure that the Local Plan makes specific reference to the importance of this versus first time buyer or shared ownership housing, in line with the Government's statement that it is included in the revised terminology. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anna Webster |
| **Comment ID** | 19843617/840 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **Affordable Housing:**<br><br>I welcome South Gloucestershire's commitment to requiring at least 35% Affordable Housing in all new housing developments and to reviewing Policy on thresholds for provision of Affordable Housing (in the light of the high level of need locally). The proposal to require arguments on viability (often used to reduce the proportion of Affordable Homes) to be part of Applications and in the public domain should help ensure higher proportions of Affordable Housing than in recent years. I welcome, too, the proposal to require Affordable Homes to be integrated with the overall design and layout of the development and as far as possible indistinguishable from market dwellings so that their occupants are not stigmatised. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Victoria & John Vlietstra |
| **Comment ID** | 19843937/851 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **Affordable Housing:**<br><br>We welcome South Gloucestershire's commitment to requiring at least 35% Affordable Housing in all new housing developments and to reviewing Policy on thresholds for provision of Affordable Housing (in the light of the high level of need locally). The proposal to require arguments on viability (often used to reduce the proportion of Affordable Homes) to be part of Applications and in the public domain should help ensure higher proportions of Affordable Housing than in recent years. We welcome, too, the proposal to require Affordable Homes to be integrated with the overall design and layout of the development and as far as possible indistinguishable from market dwellings so that their occupants are not stigmatised. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christina Fussell |
| **Comment ID** | 19843969/862 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **Affordable Housing:**<br><br>I welcome South Gloucestershire's commitment to requiring at least 35% Affordable Housing in all new housing developments and to reviewing Policy on thresholds for provision of Affordable Housing (in the light of the high level of need locally). The proposal to require arguments on viability (often used to reduce the proportion of Affordable Homes) to be part of Applications and in the public domain should help ensure higher proportions of Affordable Housing than in recent years. I welcome, too, the proposal to require Affordable Homes to be integrated with the overall design and layout of the development and as far as possible indistinguishable from market dwellings so that their occupants are not stigmatised. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Paul Fussell |
| **Comment ID** | 19844001/873 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **Affordable Housing:**<br><br>I welcome South Gloucestershire's commitment to requiring at least 35% Affordable Housing in all new housing developments and to reviewing Policy on thresholds for provision of Affordable Housing (in the light of the high level of need locally). The proposal to require arguments on viability (often used to reduce the proportion of Affordable Homes) to be part of Applications and in the public domain should help ensure higher proportions of Affordable Housing than in recent years. I welcome, too, the proposal to require Affordable Homes to be integrated with the overall design and layout of the development and as far as possible indistinguishable from market dwellings so that their occupants are not stigmatised. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Oliver Fussell |
| **Comment ID** | 10784449/885 |
| **Document Part Name** | Question 09 - Affordable Housing |

| | |
|---|---|
| **Comment** | **Affordable Housing:**<br><br>I welcome South Gloucestershire's commitment to requiring at least 35% Affordable Housing in all new housing developments and to reviewing Policy on thresholds for provision of Affordable Housing (in the light of the high level of need locally). The proposal to require arguments on viability (often used to reduce the proportion of Affordable Homes) to be part of Applications and in the public domain should help ensure higher proportions of Affordable Housing than in recent years. I welcome, too, the proposal to require Affordable Homes to be integrated with the overall design and layout of the development and as far as possible indistinguishable from market dwellings so that their occupants are not stigmatised. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tom Barnes |
| **Comment ID** | 19844673/896 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **Affordable Housing:**<br><br>I welcome South Gloucestershire's commitment to requiring at least 35% Affordable Housing in all new housing developments and to reviewing Policy on thresholds for provision of Affordable Housing (in the light of the high level of need locally). The proposal to require arguments on viability (often used to reduce the proportion of Affordable Homes) to be part of Applications and in the public domain should help ensure higher proportions of Affordable Housing than in recent years. I welcome, too, the proposal to require Affordable Homes to be integrated with the overall design and layout of the development and as far as possible indistinguishable from market dwellings so that their occupants are not stigmatised. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Peter Barker - Latteridge Road Community Group |
| **Comment ID** | 6622945/941 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **Affordable Housing:**<br><br>I welcome South Gloucestershire's commitment to requiring at least 35% Affordable Housing in all new housing developments and to reviewing Policy on thresholds for provision of Affordable Housing (in the light of the high level of need locally). The proposal to require arguments on viability (often used to reduce the proportion of Affordable Homes) to be part of Applications and in the public domain should help ensure higher proportions of Affordable Housing than in recent years. I welcome, too, the proposal to require Affordable Homes to be integrated with the overall design and layout of the development and as far as possible indistinguishable from market dwellings so that their occupants are not stigmatised. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kate Edmonds |
| **Comment ID** | 19883393/952 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **Affordable Housing:**<br><br>I welcome South Gloucestershire's commitment to reviewing Policy on thresholds for provision of Affordable Housing (in the light of the high level of need locally). I welcome, too, the proposal to require Affordable Homes to be integrated with the overall design and layout of the development and as far as possible indistinguishable from market dwellings so that their occupants are not stigmatised. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David and Tracey Jones |
| **Comment ID** | 19883585/972 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **Affordable Housing:**<br><br>I welcome South Gloucestershire's commitment to requiring at least 35% Affordable Housing in all new housing developments and to reviewing Policy on thresholds for provision of Affordable Housing (in the light of the high level of need locally). The proposal to require arguments on viability (often used to reduce the proportion of Affordable Homes) to be part of Applications and in the public domain should help ensure higher proportions of Affordable Housing than in recent years. I welcome, too, the proposal to require Affordable Homes to be integrated with the overall design and layout of the development and as far as possible indistinguishable from market dwellings so that their occupants are not stigmatised. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Cate Davidson - Sodbury Town Council |

| | |
|---|---|
| **Comment ID** | 4877793/1016 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | Dear Planning Team,<br><br>Sodbury Town Council responds as follows to the Local Plan (non strategic) Consultation:<br><br>Q. 9 STC feels that more shared ownership properties should be developed to enable people to get on the housing ladder.<br><br>Please note the Comments as appropriate. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Felicity Harrison |
| **Comment ID** | 4391425/1059 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **Page 82: Affordable Housing:**<br><br>This Policy, you suggest, will replace the Core Strategy Policy: CS18 - Affordable Housing.<br><br>2. A revised viability procedure, including a requirement to include evidence with an Application and make it publically available.<br><br>4. Due to the high level of Affordable Housing need in the District, review the Policy position on thresholds for Affordable Housing taking into account local evidence, emerging JSP Policy and National Planning Practice Guidance (NPPG).<br><br>5. Bring forward a new Policy for delivery of Affordable Housing *on Build to Rent* schemes (See Discussion Point D - Private Rented Sector (Build to Rent)). Details of the definition of affordable market rental products will need to be included and identified as an exception to usual tenures. It needs to be clear exactly what is meant by Affordable Housing. At present they just appear to be words.<br><br>1. It is proposed to provide a definition of *Build to Rent* based on the Greater London Authority definition, unless this is updated by National Guidance, as follows:<br><br>♦ A development, or block/phase within a development, of at least 50 units;<br><br>♦ The homes to be held as Build to Rent under a Covenant for at least 15 years (affordable units in perpetuity);<br><br>♦ Unified ownership and unified management of the development with professional and on-site management;<br><br>♦ All units to be self-contained and let separately;<br><br>♦ Longer tenancies (ideally three years or more) with defined in-tenancy rent reviews;<br><br>♦ Property manager to be part of an accredited Ombudsman Scheme and a member of a recognised professional body (Source: GLA (2016) Draft Affordable Housing and Viability SPG).<br><br>2. Guidance will be provided on how the elements of BtR will be secured e.g. through Section 106 Planning Obligations and Covenants. It is considered likely that this issue will be covered by changes to national Policy.<br><br>3. The delivery of the Affordable Housing element of BtR will be controlled through the Affordable Housing Policy which will recognise the specific viability issues associated with BtR and include a definition of affordable private rent which is specifically tied to BtR schemes.<br><br>4. It is proposed that the policy does not seek specific design standards however it could contain a criterion which encourages design that provides for a range of end-users e.g. younger people, sharers, families, downsizing single people/couples and students. This benefits both end users and developers by providing enhanced flexibility and choice.<br><br>5. It is considered that some flexibility on parking standards could be allowed on BtR schemes to reflect the lower car ownership rates of renters but only in accessible locations and where appropriate standards of site accessibility are met e.g. suitable drop off points. |

| | |
|---|---|
| | 6. Propose that making individual allocations for BtR is not appropriate but that there is potential to require an element of BtR in Strategic Development Locations if Government Policy changes to support this approach e.g. to create a new use class and targets for BtR. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Clifton Homes Ltd |
| **Comment ID** | 16617921/1088 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **Please see submitted Representations.** |
| **Attached documents** | Clifton Homes Ltd - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (1.7 MB) |

| | |
|---|---|
| **Respondent Name** | Barwood Development Securities Ltd and The Thornbury Landowner Consortium |
| **Comment ID** | 19884545/1097 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | Please find attached Representation. |
| **Attached documents** | Barwood Development Securities Ltd and The Thornbury Landowner Consortium - Savills (Miss. Felicity Tozer).pdf (650 KB) |

| | |
|---|---|
| **Respondent Name** | South West Strategic Development and Ian and David Knipe |
| **Comment ID** | 19884577/1113 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | Please see submitted Representations. |
| **Attached documents** | SW Strategic Development and I. and D. Knipe - Grass Roots.pdf (27.4 MB) |

| | |
|---|---|
| **Respondent Name** | Progold Ltd |
| **Comment ID** | 19737665/1126 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | Please see submitted Representations. |
| **Attached documents** | Progold Ltd - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (7.9 MB) |

| | |
|---|---|
| **Respondent Name** | Susan E. Green - Home Builders Federation (HBF) |
| **Comment ID** | 10761601/1138 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | The HBF object to the Council's intended approach to Affordable Housing. The HBF have objected to Policy 3 of the WoE JSP which sets out a minimum target of 35% Affordable Housing on sites of 5 or more dwellings. As set out in HBF Representations to the pre-submission Consultation on the WoE JSP the proposed site threshold of 5+ dwellings is unjustified and inconsistent with national Policy. It has been stated that "*meeting full Affordable Housing need is a significant challenge but not unique to the WoE*" (Housing Topic Paper, Para 3.6) therefore the need to maximise delivery from all possible sources does not justify the proposed site threshold of 5+ dwellings contrary to national Policy because it has been acknowledged that the WoE is not unique. Furthermore the minimum target of 35% and site threshold Policy requirements have not been viability tested. It has been stated that the viability evidence should "*not be used to inform the level of Affordable Housing requirement or potential infrastructure/developer contributions*" (Viability Study, Para 1.4) concluding that "*further viability testing is required as Plan making advances*" which has not been undertaken. Policy 3 of the WoE JSP cannot be repeated in the new South Gloucestershire Local Plan without further viability evidence. The Council is reminded that if the Local Plan is to be compliant with the NPPF development should not be subject to such a scale of obligations and Policy burdens that viability is threatened. The revised NPPF emphasises the importance of whole Plan viability assessment as an integral component of the Plan making process to be undertaken by the Council.<br><br>Furthermore the HBF previously objected to Policy PSP37 for all affordable dwellings to be compliant with the higher optional technical standards for M4(2) and 8% M4(3). The WMS dated 25th March 2015 stated that "*the optional new national Technical Standards should only be required through any new Local Plan Policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG.*" If the Council wishes to adopt the higher optional standards for M4(2) & M4(3) homes the Council should only do so by applying the criteria set out in the NPPG. All new homes are built to Building Regulation Part M Standards. An ageing population in itself is not unusual and it is not a phenomenon specific to South Gloucestershire. Therefore it is incumbent on the Council to provide a local assessment evidencing its specific case to justify the inclusion of these standards. If it had been the Government's intention that a generic statement justified adoption of M4(2)/(3) then the logical solution for the Government would have been to incorporate such standards as mandatory via the Building Regulations which was not done. The Council's local assessment should evidence both the justification for the inclusion of M4(2)/(3) as a Policy requirement and the quantum thereof. Such standards should only be introduced on a "need to have" rather than "nice to have" basis. With specific reference to M4(3) the NPPG confirms that the Council should only require M4(3) standards to those dwellings where the Council is responsible for allocating or nominating a person to live in that dwelling (ID 56-008). The Council should also viability test such a requirement. In September 2014 during the Government's Housing Standards Review EC Harris estimated the cost impact of M4(3) per dwelling as £15,691 for apartments and £26,816 for houses. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Emma Powell - Redrow Homes Limited |
| **Comment ID** | 19737921/1156 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | Part 3 - Policy Discussion Points:<br><br>Section 3 of the Local Plan Consultation sets out the titles of proposed Strategic Polices that will be included in the next version of the Local Plan. As such we do not have any Comments on the titles, but reserve our position to Comment on the detailed wording at the next Consultation. All Policies will need to be prepared in the context of the emerging NPPF, a final version is expected to published in the next few Months. The Strategic Policies will also need to reflect any changes to the West of England JSP as it progresses through the Examination towards adoption anticipated later in 2019.<br><br>**Question 9:**<br><br>**F. Affordable Housing**<br><br>**Do you have any views on the intended approach to Affordable Housing?**<br><br>It is noted that this Policy will replace Core Strategy Policy CS18. The Council proposed site threshold of 5+ dwellings is unjustified and inconsistent with national Policy. It has been stated that "meeting full Affordable Housing need is significant challenge but not unique to West of England" (Housing Topic Paper, Para 3.6) therefore the need to maximise delivery from all possible sources does not justify the proposed site threshold of 5+ dwellings contrary to national Policy because it has been acknowledged that the West of England is not unique. Furthermore the minimum target of 35% and site threshold Policy requirements have not been viability tested. It has been stated that the viability evidence should "*not be used to inform the level of Affordable Housing requirement or potential infrastructure/developer contributions*" (Viability Study, Para 1.4) concluding that "*further viability testing is required as Plan making advances*" which has not been undertaken. Policy 3 of the West of England JSP cannot be repeated in the new South Gloucestershire Local Plan without further viability evidence. It should be noted that the if the Local Plan is to be compliant with the NPPF, development should not be subject to such a scale of obligations and Policy burdens that viability is threatened.<br><br>Point 6 refers to all Affordable Housing complying with the Nationally Described Space Standards and optional Building Regulation Part M4 (2) Accessibility Standards and also Part M4 (3).<br><br>The WMS dated 25th March 2015 stated that *"the optional new national Technical Standards should only be required through any new Local Plan Policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG.*" If the Council wishes to adopt the higher optional standards for M4(2) & M4(3) homes the Council should only do so by applying the criteria set out in the NPPG. All new homes are built to Building Regulation Part M Standards. |
| **Attached documents** | Redrow Homes Limited (Emma Powell) - Pegasus Group (Mrs. Sarah Hamilton-Foyn).pdf (34.1 MB) |

| | |
|---|---|
| **Respondent Name** | Bovis Homes Limited |
| **Comment ID** | 20044801/1203 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | Please refer to enclosed letter. |
| **Attached documents** | Bovis Homes Limited - Rapleys LLP (Mr. Tony Clements).pdf (259 KB) |

| | |
|---|---|
| **Respondent Name** | IM Land Ltd and The Davison Family |
| **Comment ID** | 19925889/1293 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | Please see enclosed Representations Report on behalf of IM Land Ltd and The Davison Family prepared by Peter Brett Associates dated 30 April 2018. |
| **Attached documents** | IM Land Ltd and The Davison Family - Peter Brett Associates (Mr. Colin Danks).pdf (673 KB) |

| | |
|---|---|
| **Respondent Name** | Bloor Homes South West |
| **Comment ID** | 20096097/1307 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | We do not support the intention set out at Point 2 on Page 82 of the Consultation that the Council will require viability evidence to be provided up front with a Planning Application, and that this would need to be publically available. Whilst there may be instances when this information is not sensitive and can be made publically available, this is not guaranteed to be the case in all (or most) scenarios. Where disclosure of development details would be of value to a developer's commercial competitor it cannot be justified that this information needs to be made publically available in full. This is not an infrequent occurrence when it comes to viability, and which reflects the established practice of independent review of submitted viability cases, often by third party consultants acting on behalf of the Council. No evidence has been provided by the Council to identify why elements of viability remaining confidential (on the basis of commercial sensitivity) is hindering the fair determination of Planning Applications, or is otherwise not in the public interest. Nor has sufficient evidence been presented to confirm that placing this potentially commercially sensitive obligation on developers will not suppress the delivery of development. |

| | |
|---|---|
| | Secondly with respect to providing viability information up front, we object to this approach given that (notwithstanding any Pre-application engagement that may be undertaken) there may be instances where this information will not be available until progress has been made during the determination of the Application, with regard to the identification/confirmation of infrastructure contributions from Consultees. It is not practical to require a Viability Assessment to be made available with Planning Application submissions in all circumstances; clearly where a viability issue is known then this may be possible, but where it is not then this assessment may only arise out of the technical determination process, and so the Policy would not be relevant.<br><br>With regard to Point 6 on Page 83 of the Draft new Local Plan we would like to raise concerns as to the potential future wording of a Policy to control the disbursement and detailed design of affordable units. Although we accept the broad principle that affordable units should be reasonably dispersed throughout a development, that developments should contribute to the creation of mixed and balanced communities, and otherwise be designed to be 'tenure blind,' the Comments set out at Point 6 wrongly attribute National Policy as requiring affordable units to be 'indistinguishable' from market units. Paragraph 50 of the NPPF does not place this onerous requirement on the provision of affordable units. Furthermore it is not reasonable or practicable to make all affordable units wholly indistinguishable from market dwellings(where there may for example be differences in terms of scale, and/or layout), nor is it clear why this should be required if the units can be equally well designed (so as to be tenure blind in respect of general style and use of materials) and complement the other tenures on site to contribute to a mixed and balanced community. We request that the Council pay particular attention to the detailed wording of this Policy, which should require that affordable units should be well designed in order to complement the design of other dwellings on site, as part of contributing to mixed and balanced communities.<br><br>We would also like to object to any potential requirement to arbitrarily limit the clustering of affordable units to a level that is not practical when considered on a site by site basis. It is agreed that dispersion of Affordable Housing is appropriate within some developments; however a flexible approach is needed when wording the Policy to account for the different practical requirements of managing such affordable provision.<br><br>On behalf of our Client we would like to strongly set out that we do not agree with the approach to mandatory conformity with the combination of Nationally Described Space Standards and Accessibility Standards for affordable units indicated at the first Bullet Point under Point 6 on Page 82 of the Consultation Document. The Council have not prepared any evidence to indicate that there is any actual need to intervene to control the detailed layout of new dwellings. Nor has any information been provided to demonstrate whether imposition of such standards will have any impact on viability. The new Local Plan should not be imposing excessively onerous obligations that would threaten the viability of developments and in turn jeopardise the much needed delivery of both market and affordable units. Given that detailed elements of the internal layout of new dwellings are already strictly controlled by Building Regulations we do not consider it a robust approach on the part of the Emerging Local Plan to set these standards for affordable units, particularly in a context when no studies have been undertaken or evidence presented to suggest that there are any current issues with the quality and space standards of Affordable Housing currently being delivered. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Adrian Edmonds |
| **Comment ID** | 19926305/1342 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **Affordable Housing:**<br><br>I welcome South Gloucestershire's commitment to reviewing Policy on thresholds for provision of Affordable Housing (in the light of the high level of need locally). I welcome, too, the proposal to require Affordable Homes to be integrated with the overall design and layout of the development and as far as possible indistinguishable from market dwellings so that their occupants are not stigmatised. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | A. T. Bennett & Sons |
| **Comment ID** | 19926433/1363 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | Please see attached Representations. |
| **Attached documents** | T. Bennett and Sons - Origin3 (Mr. Alex Cave).pdf (1.0 MB) |

| | |
|---|---|
| **Respondent Name** | Fear Group |
| **Comment ID** | 19927745/1428 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | As set out under Question 8 above, it will be important to assess the viability impact of proposed Affordable Housing requirements on different types of development, including a range of models of provision for older people. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Daniel Kelly - South Gloucestershire Liberal Democrat Council Group |
| **Comment ID** | 10311137/1442 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | As per our JSP Submissions, we believe that the percentage of Affordable Housing required from new developments should be 40% not 35% due to the dire need for more affordable local housing in the area. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Rebecca Thompson - Wallace Land Investments |
| **Comment ID** | 19935809/1475 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | Wallace object to the requirement for all affordable dwellings to be compliant with the higher optional Technical Standards for M4(2) and 8% M4(3). The WMS dated 25th March 2015 stated that "*the optional new national Technical Standards should only be required through any new Local Plan Policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG.*"<br><br>If the Council wishes to adopt the higher optional standards for M4(2) & M4(3) homes the Council should only do so by applying the criteria set out in the NPPG. Wallace contend that an ageing population in itself is not unusual, and it is not a phenomenon specific to South Gloucestershire. As such, it is necessary for the Council to provide a local assessment evidencing its specific case to justify the inclusion of these standards.<br><br>It is also necessary for the Council to viability test such a requirement. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Laurence Parsons |
| **Comment ID** | 18822945/1493 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | *9. Affordable Housing:*<br><br>Do you have any views on the intended approach to Affordable Housing?<br><br>The major problem with "Affordable Housing" is that the houses are not actually affordable by those who need them. This term has been grossly misused, presumably in an effort to mislead the general public. It is more important to build houses that are affordable to the younger generation, than it is to build large expensive houses with a small discount. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hannah Saunders - Dodington Parish Council |
| **Comment ID** | 19931969/1615 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **COMMENTS:**<br><br>Members support the intended approach. Excellent Design and Accessibility Standards are particularly important for some of the groups who fall under the criteria of 'Affordable Housing' and are essential for maintaining a flexible stock for changing demographics such as ageing population and disabilities. Therefore it is vital to defend Affordable Housing proportion and Build Standard requirements against developer's pleas of non-viability if they were imposed. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | E. H. Schubert Will Trust |
| **Comment ID** | 12403425/1681 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | The delivery of Affordable Housing should not adversely affect the prompt delivery of other forms of housing. The approach should reflect the revised NPPF, once it is adopted later this year. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Frampton Cotterell Parish Council |
| **Comment ID** | 20175105/1698 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | Frampton Cotterell Parish Council is of the view that "Affordable Housing" needs a clear definition. Affordable Housing needs to be based on **below** market value and there needs to be restrictions on future development of those properties so that they remain affordable in the future. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | G. E. Forward |
| **Comment ID** | 20176577/1717 |

| | |
|---|---|
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | SGC must look at this more closely and clearly define their actions to provide the actual numbers needed in the right areas. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David Jonathan Redgewell - South Gloucestershire Disability Forum, Bus User U... |
| **Comment ID** | 20209409/1916 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | Questions 8, 9, and 10.<br><br>Welcome Policy PSP37.<br><br>Policy M42 M42,<br><br>Lifetime home standards.<br><br>But we are very concerned about the Wider Bristol SHMA 2016 and the need to review Wheelchair adapted standards in Lifetime homes. There is a shortage of Wheelchair accessible Homes for younger people in South Gloucestershire in rural vilages.<br><br>Welcome Affordable Housing in Extra Care Housing development but needs for Housing are not being addressed for young disabled people under 55.<br><br>An investigation is welcomed for Internal Space and Accessibility Standard of dwelling is being address but this appears not to comply with the Equalities Act 2010 and is discrimination of protected caretakers.<br><br>We need to address the need of young disabled people in the market housing system not Just the over 55s and 85s.<br><br>It is important to address this issue. We welcome a discussion with the Council on Design Standards for Wheelchair users and those with mobility issues. The ISSUE needs to be addressed within the private rented market as well as within the social rented market.<br><br>Also with a Larger retirement population in South West England, Greater Bristol, and rural South Gloucestershire.<br><br>The NPPF requires a Local Plan and Affordable Housing must meet option Building Regulation part ML(3).<br><br>Question 9 - View is clear. South Gloucestershire is not providing enough Affordable Housing with access needs.<br><br>Welcome retaining policy PSP37. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | McCarthy and Stone Retirement Lifestyles Ltd |
| **Comment ID** | 20182209/1919 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | Dear Sirs,<br><br>It has been brought to my attention that you recently Consulted on the South Gloucestershire new Local Plan. Unfortunately my Client, McCarthy and Stone was not included on the Consultation Database despite having taken part in previous Workshops with the Council on this topic and so was unaware that the Consultation was underway. I have since requested to be added to this Database on behalf of McCarthy and Stone.<br><br>As the market leader in the provision of sheltered housing for sale to the elderly, McCarthy and Stone Retirement Lifestyles Ltd considers that with its extensive experience in providing development of this nature, it is well placed to provide informed Comments on the aforementioned Document insofar as it affects or relates to housing for the elderly. |

For your convenience, please find below our Comments with regards to the Consultation. I would ask that though the Consultation has closed that these Comments are considered so that the delivery of Extra Care housing, and other forms of specialist housing for the elderly are not affected by the proposed amendments to Planning Policy in South Gloucestershire.

Dear Sir/Madam,

**McCARTHY & STONE RETIREMENT LIFESTYLES LTD.**

**RESPONSE TO CONSULTATION ON THE SOUTH GLOUCESTERSHIRE LOCAL PLAN CONSULTATION 2018:**

Thank you for the opportunity to Comment on the Consultation Papers for the aforementioned Document. As the market leader in the provision of sheltered housing for sale to the elderly, McCarthy and Stone Retirement Lifestyles Ltd considers that with its extensive experience in providing development of this nature it is well placed to provide informed Comments on the Local Plan Consultation, insofar as it affects or relates to housing for the elderly.

Question 8, 'Extra Care Housing' asked the following Question: Do you have any views on our proposed approach to the Use Class definitions in our Extra Care Housing Policy? And Question 9 asked the following qQestion: Do you have any views on the intended approach to Affordable Housing?

We have the following Comment to these two Questions:

Most forms of Extra Care Accommodation fall within Use Class C2 and Appeal precedent has confirmed that self-containment of accommodation is not the determining factor as to Use Class. Where Extra Care accommodation falls under Use Class C2 it should not be liable for Affordable Housing.

Extra Care accommodation covers a very wide spectrum of care and support provision and it is well recognised that dependent on the care and support it provides and the facilities that come with it, can fall within either the C2 or C3 Use Class, which will determine in the majority of cases whether or not a Council will seek Affordable Housing contributions from the development. This is a complex issue and there are a number of factors that determine whether or not an Extra Care development is within Use Class C3 or Use Class C2. However a recent Appeal Decision (APP/U1105/W/17/3177340, The Knowle, Station Road, Sidmouth, Devon, EX10 8HL dated 22nd January 2018) is very helpful in this regard in succinctly highlighting how the issue ought to be approached. Paragraph 37 states:

*The RTPI Good Practice Note 8 and Housing LIN5 deal specifically with Extra Care Housing and offer some guidance on possible distinctions between C2 and C3 Extra Care accommodation. These principles can be applied to the Appeal proposal. Key to the distinction is the extent to which communal services are provided and the extent to which care is available to meet the needs of residents.*

*In concluding that in that case, the proposal fell within Use Class C2, the Inspector concluded at Paragraphs 49 and 50:*

*For all of these reasons, it is clear to me that the development is offering much more than a dwelling house. Independent living accommodation is one element of the scheme but that would be provided alongside a range of communal facilities that are inextricably linked to an expected way of life. The scheme is designed to meet the needs of the target occupants and facilitate assisted living as well as social well-being and interaction with the outside world. Care would also be provided, specifically tailored to the needs of the occupant. Whilst some primary occupants of the development might, upon taking up residence, require only the minimum level of personal care there is likely to be a mix of care needs at any one time and those with limited need may well require additional care in the future.*

*I can see no justification for disaggregating different elements of the proposal or seeking to separate the individual apartments from the remainder of the scheme.*

It is submitted that the issue is very much one of Development Management and clearly that each scheme needs to be considered on its own circumstances (as was the case at Sidmouth). If however, it continues to be, it is clear that any Policy, commentary or guidance must provide sufficient flexibility to allow for consideration of the specific circumstances of each scheme.

Delivering beneficial Sheltered Housing and Extra Care Accommodation should be prioritised in South Gloucestershire to meet its identified housing needs and not unnecessarily confused or complicated by erroneous and misleading statements.

It is well established that it is inappropriate to mix specialist housing for the elderly with other (family/younger persons) housing in a single flatted block. Given the nature of the District, that is where most, if not all the new stock will come from.

Well located and designed specialist housing for older home owners is a highly sustainable form of housing. Given the critical need for older person's accommodation in South Gloucestershire there should be a presumption in favour of sustainable housing and in particular specialist housing which is being proposed on suitable sites. It is recommended that greater weight is attached to this approach alongside the desire to release residential land within strategic allocations or indeed a separate Policy within the Document to cover the housing need for the ageing population. This accommodation will come from a number of sources both public and private and with varying levels of care and shelter provision enabling individual people to remain in their own home with independence and security. In effect there should be more of a positive Policy supporting older people's accommodation in the same way that Affordable Housing is given a high priority.

The National Planning Policy Framework stipulates that the Planning System should be *'supporting strong, vibrant and healthy communities' and highlights the need to 'deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive mixed communities. Local Planning Authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community.... such as.... older people'* (emphasis added).

The National Planning Practice Guidance reaffirms this in the guidance for assessing housing need in the Plan making process entitled ***"How should the needs for all types of housing be addressed?*** *(Paragraph: 021 Reference ID: 2a-021-20140306) and a separate subsection is provided for* ***"Housing for older people."*** *This stipulates that "the need to provide housing for older people is critical given the projected increase in the*

| | |
|---|---|
| | *number of households aged 65 and over accounts for over half of the new households (Department for Communities and Local Government Household Projections 2013). Plan makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to move. This could free up houses that are under-occupied. The age profile of the population can be drawn from Census data. Projections of population and households by age group should also be used. The future need for older persons housing broken down by tenure and type (e.g. Sheltered, enhanced sheltered, Extra Care, registered care) should be assessed and can be obtained from a number of online tool kits provided by the sector. The assessment should set out the level of need for residential institutions (Use Class C2). But identifying the need for particular types of general housing, such as bungalows, is equally important" (My emphasis).*<br><br>*The 'Housing White Paper: Fixing our broken housing market' clearly signals that greater consideration must be given to meeting the needs of older persons' in Local Plans stipulating that:*<br><br>*'Offering older people a better choice of accommodation can help them to live independently for longer and help reduce costs to the Social Care and health systems. We have already put in place a Framework linking Planning Policy and Building Regulations to improve delivery of accessible housing. To ensure that there is more consistent delivery of accessible housing, the Government is introducing a new statutory duty through the Neighbourhood Planning Bill on the Secretary of State to produce guidance for Local Planning Authorities on how their local development Documents should meet the housing needs of older and disabled people. Guidance produced under this duty will place clearer expectations about Planning to meet the needs of older people, including supporting the development of such homes near local services82. It will also set a clear expectation that all Planning Authorities should set Policies using the Optional Building Regulations to bring forward an adequate supply of accessible housing to meet local need. In addition, we will explore ways to stimulate the market to deliver new homes for older people' (Para 4.42) (My emphasis).*<br><br>*In line with the rest of the country, the Plan demonstrates an acceptance that the demographic profile of the Authority is projected to age. The largest proportional increases in the older population are expected to be of the 'frail' elderly, those aged 85 and over, who are more likely to require specialist care and accommodation provided by Extra Care accommodation. It is therefore clear that the provision of adequate support and accommodation for the increasingly ageing demographic profile of the Spatial area is a significant challenge.*<br><br>*Unless properly planned for, there is likely to be a serious shortfall in specialist accommodation for the older population in South Gloucestershire, which will have a knock on effect in meeting the housing needs of the whole area and wider Policy objectives. Specialist accommodation for the elderly, such as that provided by McCarthy and Stone, will therefore have a vital role in meeting the area's housing needs.*<br><br>*We consider that the best approach towards meeting the diverse housing needs of older people is one that encourages both the delivery of specialist forms of accommodation such as sheltered/retirement housing and Extra Care accommodation.*<br><br>*When selecting sites for elderly persons' accommodation careful consideration is given to locational criteria including: Topography, Environment (including safety and security), Mobility, Services and Community Facilities. As such, suitable sites for specialist accommodation for the elderly are difficult to find and tend to be located within, or adjacent to town or local centres. It is therefore highly unlikely that the majority of development sites will be suitable for specialist accommodation for the elderly, particularly on urban extension sites where access to goods and services may be limited. Having said that, when new local centres are being created these may also provide an appropriate location for retirement housing developments.*<br><br>*Specialist accommodation for the elderly also usually provides an element of care and communal facilities at an additional cost to the developer. This requires a critical mass of residents in order to be feasible and small scale developments of specialist housing for the elderly could not be realistically asked to provide or maintain such facilities. It is therefore unlikely to expect the provision of specialist accommodation for the elderly to be met piecemeal in general needs housing developments.*<br><br>*We would like to highlight the advice provide in the Housing in Later Life: Planning Ahead for Specialist Housing for Older People toolkit. This toolkit was developed by a Consortium of private and public organisations with an interest in housing for the elderly and encourages a joined up approach to Planning, Housing and Social Care Policy both in the collection of evidence and the development of specialist accommodation for the elderly. A copy of this Document has been appended for your convenience. Whilst we appreciate that no one Planning approach will be appropriate for all areas, an example Policy is provided that, we hope, will provide a useful reference for the Council:*<br><br>*"The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations.*<br><br>*The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances and to actively encourage developers to build new homes to the 'Lifetime Homes' Standard so that they can be readily adapted to meet the needs of those with disabilities and the elderly as well as assisting independent living at home. The Council will, through the identification of sites, allowing for windfall developments, and/or granting of Planning Consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities."*<br><br>*Well located and designed specialist housing for older home owners is a highly sustainable form of housing. Given the critical need for older person's accommodation in South Gloucestershire there should be a presumption in favour of sustainable housing and in particular specialist housing which is being proposed on suitable sites. It is recommended that greater weight is attached to this approach alongside the desire to release residential land within strategic allocations or indeed a separate Policy within the Document to cover the housing need for the ageing population. This accommodation will come from a number of sources both public and private and with varying levels of care and shelter provision enabling individual people to remain in their own home with independence and security. In effect there should be more of a positive Policy supporting older people's accommodation in the same way that Affordable Housing is given a high priority.*<br><br>*I trust that the above Comments will be considered in the evolution of any emerging Consultation Document and that we will continue to be invited to Comment as the Document progresses.* |
| **Attached documents** | McCarthy and Stone Retirement Lifestyles Ltd - The Planning Bureau Limited (Carla Fulgoni).pdf (213 KB) |

| | |
|---|---|
| **Respondent Name** | Helen Bone - West of England Community Homes (WECH) |
| **Comment ID** | 20147425/1928 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **4. Potential for Community Led Housing to Deliver Affordable Housing and the Role that Planning Policy Can Play:** |

| | |
|---|---|
| | Community Led Housing projects aim to provide Affordable Housing in neighbourhoods where market failure and property speculation have taken the costs of private rented accommodation and Starter Homes for sale beyond the means of many people who live in South Gloucestershire. The National Housing Federation's Report Home Truths 2016/17: The Housing Market in the South West, put the ratio of average house prices to average earnings in South Gloucestershire at 9.4 : 1, one of the highest ratios in the UK.<br><br>Underlying much of the recent meteoric rise in house prices has been the rise in land values produced by the increasing use of property as a speculative asset class. For Affordable Housing to be produced and community-led schemes to be established in this climate therefore, public Policy instruments, especially Planning Tools, need to promote their development.<br><br>o Planning Policy can strategically identify a supply of land through site allocation process that can be acquired at below-market values for Affordable Housing and which can subsequently be protected in perpetuity from market pressures that would otherwise destroy affordability over time.<br><br>o Planning Policy can direct a mix of housing types and tenures to meet CLH market demand.<br><br>o Planning Policy can provide clear guidance and expectations for Planning Applications and a positive environment for CLH delivery.<br><br>The Smith Institute Report on Community Led Housing suggests the need to simplify the Planning process for community led groups<br><br>Recommendation 10 (Page 10 in Report): The Government should review the Neighbourhood Planning Process, with a view to simplifying the process and promoting Community-Led Housing groups as Affordable Housing providers.<br><br>The role of Local Authorities in boosting delivery of affordable and socially integrated housing through the CLH Sector, including through the Planning System, has been recognised in a recent Report by the Co-operative Councils Innovation Network (CCIN). This extremely useful Report contains detailed Case Studies and recommendations for Councils on the various routes available for supporting communities to deliver their own homes, and we suggest that it may be a useful reference to guide the ongoing development of the SGC Local Plan and associated Supplementary Planning Documents. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Bloor Homes (South West) |
| **Comment ID** | 20211105/1950 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | Please find attached Representation. |
| **Attached documents** | Local Plan 2018-36 - Coalpit Heath.pdf (205 KB)<br>Appendix 1 - Part 4.pdf (6.0 MB)<br>Appendix 1 - Part 2.pdf (6.7 MB)<br>Appendix 1 - Part 1.pdf (11.3 MB)<br>Appendix 1 - Part 6.pdf (17.4 MB)<br>Appendix 2.pdf (453 KB)<br>Appendix 1 - Part 3.pdf (7.3 MB)<br>Appendix 1 - Part 5.pdf (6.4 MB) |

| | |
|---|---|
| **Respondent Name** | H2 Development Management (Land to Rear of Mount Pleasant Farm, Longwell Green) |
| **Comment ID** | 20377281/1964 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | *Affordable Housing:*<br><br>4.17 The Housing Topic Paper supporting the West of England JSP set out that the need for Affordable Housing across the West of England is some 32,200 Affordable Homes, which includes a need for 5,500 dwellings in South Gloucestershire and 18,800 in Bristol. The JSP Authorities acknowledge that meeting this need will be a *"significant challenge,"* and that Affordable Housing delivery is a *"significant priority."*<br><br>4.18 The Housing Topic Paper added that due to viability and land constraints in Bristol – which is where the majority of Affordable Housing need arises – current projections identify that the scale of this need is too great. Affordable Housing delivery will need to be balanced across the four Authorities, the Topic Paper states that:<br><br>***"In order to achieve this balance, the four UAs have identified in the Plan that the Strategic Development Locations (SDLs) and other Strategic Locations within or well related to the Bristol urban area must contribute to addressing the Affordable Housing need of Bristol as well as their own local need."***<br><br>4.19 As part of the JSP's Submission to the Secretary of State for independent Examination, updated Strategic Housing Market Assessments have also been published for the Wider Bristol and Bath Housing Market Areas.<br><br>4.20 The updated SHMAs show a minor uplift in the Full Objectively Assessed Need for housing between 2016 - 2036 from 84,364 to 86,959 homes between 2016 and 2036 in the wider Bristol HMA, recommending that there is a need for 87,000 dwellings over the 20 year period, which includes the Objectively Assessed Need for Affordable Housing (26,900 dwellings). It is critical to note that this is considerably lower than the identified housing need of circa 140,000 homes put forward by many industry professionals.<br><br>4.21 The need for Affordable Housing has been reduced from 29,100 Affordable Homes to 26,900 dwellings. A contributor towards this is the role |

| | |
|---|---|
| | of the private rented sector (PRS) in accommodating some of these households in need. It is important to highlight that the PRS is not a suitable substitute for Affordable Housing and does not present an alternative in meeting the housing needs of low income families.<br><br>4.22 Whilst the updated SHMA acknowledges that the PRS is not counted in the Affordable Housing supply figure, it nevertheless states that *"It does assume that Housing Benefit will continue to help some households to afford their housing costs, and as a consequence these households will not need Affordable Housing"* (Para 3.102).<br><br>4.23 This was recognised by the Inspector examining the Eastleigh Borough Local Plan 2011 - 20291 who stated in Paragraph 29 of his Report that *"There is no justification in the Framework or Guidance for reducing the identified need for Affordable Housing by the assumed continued role of the PRS with LHA* [Local Housing Allowance]*."*<br><br>1 28th November 2014<br><br>4.24 The Inspector stated *that "This category of housing does not come within the definition of Affordable Housing in the Framework,"* nor is it included in the definition of the Draft NPPF which is currently out for public Consultation. He added that *"There is not the same security of tenure as with Affordable Housing and at the lower-priced end of the PRS the standard of accommodation may well be poor."*<br><br>4.25 It later adds that if no households were to receive Housing Benefit support in the private rented sector, just over half of the growth in household numbers would need Affordable Housing – which would require a total of 46,963 Affordable Homes to be provided over the 20-year Plan Period (Para 3.104), 75% higher than identified needs, highlighting the extent of the affordability crisis in the Wider Bristol HMA.<br><br>4.26 The picture of chronic unaffordability is not just experienced in Bristol, the South Gloucestershire LP acknowledges that a key issue in the Local Authority is that there are *"Significant issues of affordability and need for Affordable Housing due to the relative cost of housing in comparison with average earnings"* in South Gloucestershire (Page 14). The LP later adds that there is an *"affordability crisis"* in the District.<br><br>4.27 Figure 3 below illustrates that the ratio of lower quartile house prices in relation to lower quartile incomes in South Gloucestershire have risen dramatically, more than doubling from a ratio of 3.69 in 1997 to 9.51 in 2016. There has been a continued increase in the ratio since 2011, demonstrating the worsening affordability in the Local Authority alone.<br><br>Please see the attached Document for Figure 3 which is referenced below.<br><br>*Figure 3: Ratio of Lower Quartile House Prices to Lower Quartile Incomes in South Gloucestershire*<br><br>*Source ONS - Ratio of lower quartile house prices to lower quartile gross annual workplace based earnings. Table 6c.*<br><br>4.28 The Graph shows that lower quartile house prices are nearly 10 times higher than lower quartile incomes in South Gloucestershire, the highest ratio on record.<br><br>4.29 The site at Longwell Green would not require any new significant infrastructure provision as it already has this due to its sustainable location adjacent to the built-up area, this includes the Affordable Housing on the adjacent site as developed by Sovereign providing an opportunity to expand upon this provision.<br><br>4.30 In summary, the South Gloucestershire LP must identify sites which are well related to the Bristol urban area in helping meet the city's housing needs, and the Emerging Spatial Strategy of the LP is crucial in ensuring this is achieved. For the reasons set out above, it is therefore considered that Option 2 be the most appropriate Strategy to take forward via the LP process. |
| **Attached documents** | Development Management - Tetlow King Planning (Sean Lewis).pdf (5.4 MB) |

| | |
|---|---|
| **Respondent Name** | JFG Gunnery |
| **Comment ID** | 19741793/1982 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | The delivery of Affordable Housing should not adversely affect the prompt delivery of other forms of housing. It is sensible for this approach to be reviewed following further progress of the JSP and publication of a revised NPPF/NPPG later this year.<br><br>On smaller-scale residential schemes Affordable Housing Policy should be tailored first to ensure that development remains viable and, secondly encourages prompt delivery. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | South West HARP Planning Consortium |
| **Comment ID** | 16478465/2003 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | Dear Sir/Madam, |

**RE: NEW LOCAL PLAN CONSULTATION**

We represent the **South West HARP Planning Consortium** which includes all the leading Housing Association Registered Providers (HARPs) across the South West. Our Clients' principal concern is to optimise the provision of Affordable Housing through the preparation of consistent Policies that help deliver the wider economic and social outcomes needed throughout the South West region.

**National Context:**

It is imperative that the Council take into account recent changes and proposed changes in legislation and Policy. The Council will be aware of the publication of the Government's Draft National Planning Policy Framework (NPPF) in March of this year. The Draft NPPF proposes a number of Planning Reforms in order to boost the delivery of both market and Affordable Housing. The proposals signal a shift in the Government's priorities to comprise a stronger Plan-led approach to Planning, as a mechanism to support the provision of new homes, improve affordability and ensure delivery.

Prime Minister Theresa May stated in her launch speech that:

*"… To stop the seemingly endless rise in house prices, we simply have to build more homes – especially in the places where un-affordability is greatest."*

As an instrument to address the growing affordability issues across the country, the Draft NPPF proposes to implement a new wider Affordable Housing definition, introducing new models and tenures to address the needs of a greater proportion of people in need of Affordable Homes. This indicates the Government's push for a wider variety of Affordable Home ownership and rental options.

The Draft NPPF also seeks to reinforce the 10-unit Affordable Housing threshold that was introduced in the 24th November 2014 Written Ministerial Statement and implement the standardised approach to assessing housing need as outlined in last year's Housing White Paper.

**Local Context:**

Evidence from the National Housing Federation's Home Truths South West Report 2017/18 indicates that South Gloucestershire is steadily becoming one of the most unaffordable places to live in the South West. Based on 2017 data, the average house price in South Gloucestershire was £274,777. When taken against average annual earnings of £27,253, this results in a house price to income ratio of 10.1 which means that in South Gloucestershire the average value of a property is more than 10 times the average annual income.

As property prices have continued to rise, increasing numbers of people are living in the private rented sector. The rise in numbers renting, coupled with below average salaries has contributed to a rise in the number of working people claiming Housing Benefit. With the average private rented property costing £929 to rent per Month, South Gloucestershire's mean Monthly private sector rent is the second highest across the South West.

Home Truths South West reports that there is already a moderate stock of Housing Association Affordable Homes already in South Gloucestershire, with a provision of 12,796 such properties. It is important to highlight that despite this provision South Gloucestershire is already suffering from a lack of affordability which means that significantly more market and Affordable Housing needs to be provided to alleviate the affordability issue.

**Affordable Housing Shortfall:**

The existing South Gloucestershire Local Plan was adopted in December 2013 and covers the period 2006 to 2027. Completions data suggests that since the start of the Plan Period in 2006 a gross total of 2,906 affordable dwellings have been completed, as illustrated in Figure 1. This means that every year, the Council has provided a gross average of around than 264 Affordable Homes.

It is important to note that the Affordable Housing delivery needs to be reviewed with caution; the 2,906 affordable dwellings is a gross amount which does not take into account any losses in housing stock - Right to Buy (RtB) sales can represent significant losses.

***Figure 1:*** *Gross Affordable Housing Provision in South Gloucestershire 2006 - 2017*

Please see the attached Document for Figure 1 which is referenced above.

***Source:*** *Annual Monitoring Reports (2015 - 17); BNP Paribas Housing Delivery Report (2016)*

Figure 2 compares the annualised Affordable Housing requirement in the 2009 SHMA and 2015 SHMA with gross Affordable Housing delivery in the District over the SHMA period. The data indicates that there has been a shortfall of 4,220 Affordable Homes to date and the Council has only exceeded the SHMA requirement once since the start of the period.

***Figure 2:*** *Gross Affordable Shortfall in South Gloucestershire 2009 - 2017*

Please see the attached Document for Figure 2 which is referenced above.

*Source: Annual Monitoring Reports (2015 - 17); BNP Paribas Housing Delivery Report (2016); SHMA (2009); SHMA (2015)*

Given the acute Affordable Housing need in South Gloucestershire, we encourage the Council to set ambitious targets to increase Affordable Housing delivery across the Authority. Providing a separate target in the Local Plan solely for the delivery of Affordable Housing is a useful Planning measure and should include a review mechanism to ensure that if the target is not being met that appropriate action is taken to bring forward development of more Affordable Housing. This should be considered alongside those measures set out in the Draft NPPF and PPG Housing Delivery Test to be effective.

| | |
|---|---|
| | **Question 9: F. Affordable Housing:**<br><br>We encourage the Council to be mindful of the proposed changes to the definition of Affordable Housing put forward in the Draft NPPF; proposed and any future changes to the definition should be appropriately reflected within the Policy.<br><br>Smaller sites often form a considerable proportion of windfall delivery and as a result can significantly increase Affordable Housing delivery. This is due to the fact that these types of sites generally take less time to be build out and consequently will be available to the market sooner than provision on larger schemes.<br><br>Therefore, we encourage the Council to lower the Affordable Housing threshold on sites across the Authority from 10 dwellings to five dwellings, in line with those proposed in the Joint Spatial Plan. By implementing a lower Affordable Housing threshold, the Council can boost its supply of Affordable Housing through the contributions made on smaller sites.<br><br>With regard to Build to Rent, we support the Council's ambition to secure Affordable Housing contributions from this tenure; however, the Policy should be in line with provisions made in the Draft NPPF and supported by the appropriate Viability Assessments.<br><br>Similarly, we support the Council's continued approach to the implementation of the Nationally Described Space Standards and optional Building Regulations Part M4(2) and the application of 8% of Affordable Housing to meet Building Regulations Part M4(3) Wheelchair Adapted Standard, in line with recommendations in the Wider Bristol SHMA 2016. We would like the Council to consider applying this standard across all tenures to ensure Registered Providers are competing on an equal basis for land purchases.<br><br>We note that the Council intends to set out its approach on the use of Vacant Building Credit (VBC) in a 'revised SPD.' We are of the view that the new Local Plan is the most appropriate platform for the Council to set out and justify its approach to VBC, thereby providing greater certainty for developers.<br><br>The Local Plan should seek to drive change across the Authority through a pragmatic and ambitious approach to Affordable Housing, encouraging greater diversity to meet all needs. We strongly encourage the Council to set ambitious targets for Affordable Housing as a mechanism to significantly increase delivery and improve affordability across the Authority.<br><br>We would like to be Consulted on further stages of the Plan and other publications by the Council, by email only to consultation@tetlow-king.co.uk. Please ensure that the **South West HARP Planning Consortium** is retained on the Planning Policy Database, with **Tetlow King Planning** listed as their Agents. |
| **Attached documents** | South West HARP Planning Consortium - Tetlow King Planning (Annie Gingell).pdf (573 KB) |

| | |
|---|---|
| **Respondent Name** | Douglas Homes |
| **Comment ID** | 20120033/2012 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **Affordable Housing:**<br><br>Douglas Homes support the review of Affordable Housing Policy with the Local Plan Review to ensure that Local Plan Policy is in line with national Policy as far as possible. It is noted that the Draft JSP includes an Affordable Housing Policy (Policy 3) which sets out requirements for Affordable Housing and thresholds. Douglas Homes have provided Comment on this, stating that Affordable Housing Policy is more appropriately dealt with at the local level, rather than within the JSP.<br><br>The Affordable Housing Policy within the Local Plan should only apply to housing proposals (Use Class C3). Requiring Affordable Housing contributions on any development that does not include Use Class C3 would not pass the test of Planning Obligations as set out in Paragraph 204 of the National Planning Policy Framework (NPPF). This states Planning Obligations must meet all the following tests:<br><br>• Necessary to make the development acceptable in Planning terms;<br><br>• Directly related to the development; and<br><br>• Fairly and reasonably related in scale and kind to the development.<br><br>It is contended that applying an Affordable Housing contribution to anything other than Use Class C3 development would fail to meet at least the first two tests in the NPPF.<br><br>The requirement to provide a Viability Appraisal if the quantum of Affordable Housing provision is being challenged on viability grounds is accepted. However, any Policy should make it clear that Viability Appraisals are only required when Affordable Housing provision lower than the Policy target is being sought. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ellandi LLP and The Englander Group |
| **Comment ID** | 20119969/2018 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | Part 3 - Policy Discussion Points: |

| | |
|---|---|
| | As a final point, we note with interest that you are currently reviewing a series of Policies within the adopted Core Strategy and PSP Plan as well as introducing a series of new Policies such as a Policy for Build to Rent.<br><br>We look forward to reviewing these Policies as and when they are drafted. For the time being however, we wish to make the following Comments:<br><br>o We note that Draft Policy 3 of the JSP sets an Affordable Housing target for the West of England and indicates that for residential developments delivering 5 or more dwellings or sites larger than 0.2ha, whichever is the lower, a minimum target of 35% Affordable Housing to be delivered on site is required. This threshold is not explicitly referred to in the Consultation Document; it does however state that "due to the high level of Affordable Housing need in the District, review the Policy position on thresholds for Affordable Housing taking into account local evidence, Emerging JSP Policy and National Planning Practice Guidance (NPPG)."<br><br>Clarification is required as to whether this threshold is still being considered by the JSP Authorities (having regard to adopted guidance contained with the NPPG makes it clear that Affordable Housing contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floor space of no more than 1,000 square metres (gross internal area)). We are concerned that the Emerging JSP Policy could put at risk the delivery of small scale housing developments (small windfall sites). This type of housing development is expected to deliver 6,860 homes over the JSP Plan Period. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sue Hope |
| **Comment ID** | 411169/2037 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **Affordable Housing:**<br><br>The percentage of Affordable Housing required from new developments should be 40% not 35% due to the need for more affordable local housing in the area. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sebastian Loyn - YTL Developments (UK) Limited |
| **Comment ID** | 19779841/2079 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | F: Affordable Housing:<br><br>We note the Consultation Document was prepared prior to the release of the new NPPF. However, we would welcome the opportunity to explore definitions around Affordable Housing and if elements of this can be delivered on the Airfield as part of a holistic solution. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alex Atkinson - Edward Ware Homes (Land East of Coalpit Heath) |
| **Comment ID** | 20247169/2108 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Edward Ware Homes (Mr. Alex Atkinson) - Pegasus Group (Mr. Daniel Weaver).pdf (57.6 MB) |

| | |
|---|---|
| **Respondent Name** | Jackson Moulding - Ecomotive Limited |
| **Comment ID** | 20165345/2137 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **4. Potential for Community Led Housing to deliver Affordable Housing and the role that Planning Policy can play:**<br><br>Community Led Housing projects aim to provide Affordable Housing in neighbourhoods where market failure and property speculation have taken the costs of private rented accommodation and Starter Homes for sale beyond the means of many people who live in South Gloucestershire. The National Housing Federation's Report Home Truths 2016/17: The Housing Market in the South West, put the ratio of average house prices to average earnings in South Gloucestershire at 9.4 : 1, one of the highest ratios in the UK.<br><br>Underlying much of the recent meteoric rise in house prices has been the rise in land values produced by the increasing use of property as a speculative asset class. For Affordable Housing to be produced and community-led schemes to be established in this climate therefore, public Policy instruments, especially Planning Tools, need to promote their development. |

| | |
|---|---|
| | ● Planning Policy can strategically identify a supply of land through site allocation process that can be acquired at below-market values for Affordable Housing and which can subsequently be protected in perpetuity from market pressures that would otherwise destroy affordability over time.<br><br>● Planning Policy can direct a mix of housing types and tenures to meet CLH market demand.<br><br>● Planning Policy can provide clear guidance and expectations for Planning Applications and a positive environment for CLH delivery.<br><br>The Smith Institute Report on Community Led Housing suggests the need to simplify the Planning process for Community Led Groups.<br><br>Recommendation 10 (Page 10 in Report): The Government should review the Neighbourhood Planning Process, with a view to simplifying the process and promoting Community-led Housing Groups as Affordable Housing providers.<br><br>The role of Local Authorities in boosting delivery of affordable and socially integrated housing through the CLH Sector, including through the Planning System, has been recognised in a recent Report by the Co-operative Councils Innovation Network (CCIN). This extremely useful Report contains detailed Case Studies and recommendations for Councils on the various routes available for supporting communities to deliver their own homes, and we suggest that it may be a useful reference to guide the ongoing development of the SGC Local Plan and associated Supplementary Planning Documents. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Paul Davis - Persimmon Homes Severn Valley |
| **Comment ID** | 3553569/2146 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | Question 9 – Affordable Housing:<br><br>8.22 Any changes to Affordable Housing Policy will need to reflect the new definition of Affordable Housing and Build to Rent housing set out in Draft PPG and include discounted market sales housing and other low cost homes to rent and buy. In addition the proposed site threshold of 5 dwellings is inconsistent with national Policy. In meeting JSP Affordable Housing Policy, there are currently a number of objections to the Policy which will need to be tested at Examination. However, in applying JSP Affordable Housing Policy the Council will need to produce its own evidence to justify the approach and in particular viability evidence in accordance with National Guidance. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | CEG and The Charfield Landowners Consortium |
| **Comment ID** | 16664993/2219 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **F: Affordable Housing:**<br><br>The proposed Policy approach to Affordable Housing suggests that contributions will be sought from residential developments, including Self and Custom Build, student accommodation and Extra Care Housing (where this meets the definition above). Seeking contributions from these types of development presents challenges, particularly in the case of Self and Custom Build Units. At present, there are no tenure models which are appropriate to Self or Custom Build Units, and it is unclear if any Registered Social Landlords would be willing to take on such units. In effect, therefore, there is a risk that any shortfall in contributions would be levied against open market housing within the scheme. This could potentially impact viability.<br><br>The viability of Affordable Housing can be enhanced by a more flexible approach to the tenure split between Starter Homes, low cost home ownership and social rental properties. Whilst it is important to reflect local needs, it is also clear that changes to the tenure mix can result in a higher overall level of Affordable Housing delivery. We would recommend that it is made clear that tenure mix will be negotiated on a site-by-site basis. Any Draft Policy on Affordable Housing should be worded to make clear that tenure split and mix will be negotiated on a site-by-site basis. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ashfield Land |
| **Comment ID** | 16658689/2282 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | ***Q9. F. Affordable Housing***<br><br>***Do you have any views on the intended approach to Affordable Housing?***<br><br>8.43 We support the emerging approach to the delivery of Affordable Housing and reiterate earlier Comments made regarding the need for the NLP to provide a wide portfolio of land, including unconstrained Greenfield land that can be balanced against more complicated and expensive Brownfield sites to ensure that appropriate levels of Affordable Housing are delivered.<br><br>8.44 At this point we would like to confirm that the Castle Farm Road site is relatively unconstrained and will be able to deliver Policy compliant levels of Affordable Housing. This further underlines its delivery credentials and appropriateness for allocation. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Amanda Scott |
| **Comment ID** | 20374561/2293 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **Affordable Housing:**<br><br>I welcome South Gloucestershire's commitment to requiring at least 35% Affordable Housing in all new housing developments and to reviewing Policy on thresholds for provision of Affordable Housing (in the light of the high level of need locally). The proposal to require arguments on viability (often used to reduce the proportion of Affordable Homes) to be part of Applications and in the public domain should help ensure higher proportions of Affordable Housing than in recent years. I welcome, too, the proposal to require Affordable Homes to be integrated with the overall design and layout of the development and as far as possible indistinguishable from market dwellings so that their occupants are not stigmatised. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | H2 Development Management (Land at Williams Close, Longwell Green) |
| **Comment ID** | 20376737/2302 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | *Affordable Housing:*<br><br>4.19 The Housing Topic Paper supporting the West of England JSP set out that the need for Affordable Housing across the West of England is some 32,200 Affordable Homes, which includes a need for 5,500 dwellings in South Gloucestershire and 18,800 in Bristol. The JSP Authorities acknowledge that meeting this need will be a *"significant challenge,"* and that Affordable Housing delivery is a *"significant priority."*<br><br>4.20 The Housing Topic Paper added that due to viability and land constraints in Bristol – which is where the majority of Affordable Housing need arises – current projections identify that the scale of this need is too great. Affordable Housing delivery will need to be balanced across the four Authorities, the Topic Paper states that:<br><br>***"In order to achieve this balance, the four UAs have identified in the Plan that the Strategic Development Locations (SDLs) and other Strategic Locations within or well related to the Bristol urban area must contribute to addressing the Affordable Housing need of Bristol as well as their own local need."***<br><br>4.21 As part of the JSP's Submission to the Secretary of State for independent Examination, updated Strategic Housing Market Assessments have also been published for the Wider Bristol and Bath Housing Market Areas.<br><br>4.22 The updated SHMAs show a minor uplift in the Full Objectively Assessed Need for housing between 2016 - 36 from 84,364 to 86,959 homes between 2016 and 2036 in the wider Bristol HMA, recommending that there is a need for 87,000 dwellings over the 20 year period, which includes the Objectively Assessed Need for Affordable Housing (26,900 dwellings). It is critical to note that this is considerably lower than the identified housing need of circa 140,000 homes put forward by many industry professionals.<br><br>4.23 The need for Affordable Housing has been reduced from 29,100 Affordable Homes to 26,900 dwellings. A contributor towards this is the role of the Private Rented Sector (PRS) in accommodating some of these households in need. It is important to highlight that the PRS is not a suitable substitute for Affordable Housing and does not present an alternative in meeting the housing needs of low income families.<br><br>4.24 Whilst the updated SHMA acknowledges that the PRS is not counted in the Affordable Housing supply figure, it nevertheless states that *"It does assume that Housing Benefit will continue to help some households to afford their housing costs, and as a consequence these households will not need Affordable Housing"* (Para 3.102).<br><br>4.25 This was recognised by the Inspector examining the Eastleigh Borough Local Plan 2011 - 20292 who stated in Paragraph 29 of his Report that *"There is no justification in the Framework or Guidance for reducing the identified need for Affordable Housing by the assumed continued role of the PRS with LHA* [Local Housing Allowance]*."*<br><br>2 28th November 2014<br><br>4.26 The Inspector stated *that "This category of housing does not come within the definition of Affordable Housing in the Framework,"* nor is it included in the definition of the Draft NPPF which is currently out for public Consultation. He added that *"There is not the same security of tenure as with Affordable Housing and at the lower-priced end of the PRS the standard of accommodation may well be poor."*<br><br>4.27 It later adds that if no households were to receive Housing Benefit support in the Private Rented Sector, just over half of the growth in household numbers would need Affordable Housing – which would require a total of 46,963 Affordable Homes to be provided over the 20-year Plan Period (Para 3.104), 75% higher than identified needs, highlighting the extent of the affordability crisis in the Wider Bristol HMA.<br><br>4.28 The picture of chronic unaffordability is not just experienced in Bristol, the South Gloucestershire LP acknowledges that a key issue in the Local Authority is that there are *"Significant issues of affordability and need for Affordable Housing due to the relative cost of housing in comparison with average earnings"* in South Gloucestershire (Page 14). The LP later adds that there is an *"affordability crisis"* in the District.<br><br>4.29 Figure 3 below illustrates that the ratio of lower quartile house prices in relation to lower quartile incomes in South Gloucestershire have risen dramatically, more than doubling from a ratio of 3.69 in 1997 to 9.51 in 2016. There has been a continued increase in the ratio since 2011, demonstrating the worsening affordability in the Local Authority alone.<br><br>*Figure 3: Ratio of Lower Quartile House Prices to Lower Quartile Incomes in South Gloucestershire* |

| | |
|---|---|
| | *Source: ONS - Ratio of lower quartile house prices to lower quartile gross annual workplace based earnings, Table 6c*<br><br>Please see the attached Document for Figure 3 which is referenced above.<br><br>4.30 The Graph shows that lower quartile house prices are nearly 10 times higher than lower quartile incomes in South Gloucestershire, the highest ratio on record.<br><br>4.31 The site at Williams Close would not require any new significant infrastructure provision as it already has this due to its sustainable location adjacent to the built-up area, this includes the Affordable Housing on a nearby site being developed by Sovereign providing an opportunity to expand upon this provision.<br><br>4.32 In summary, the South Gloucestershire LP must identify sites which are well related to the Bristol urban area in helping meet the city's housing needs, and the Emerging Spatial Strategy of the LP is crucial in ensuring this is achieved. For the reasons set out above, it is therefore considered that Option 2 be the most appropriate Strategy to take forward via the LP process. |
| **Attached documents** | Development Management - Tetlow King Planning (Sean Lewis).pdf (5.3 MB) |

| | |
|---|---|
| **Respondent Name** | Fortannia Ltd |
| **Comment ID** | 19741217/2332 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | **Qu.9 F Affordable Housing. Do you have any views on the intended approach to Affordable Housing?**<br><br>The delivery of Affordable Housing should not adversely affect the prompt delivery of other forms of housing. It is sensible for this approach to be reviewed following further progress of the JSP and publication of a revised NPPF/NPPG later this year. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Redrow Homes South West, Julia Wallington, Debra Turner, Andrew Williams, Chr... |
| **Comment ID** | 20167105/2350 |
| **Document Part Name** | Question 09 - Affordable Housing |
| **Comment** | 8.39 We support the emerging approach to the delivery of Affordable Housing and reiterate earlier Comments made regarding the need for the NLP to provide a wide portfolio of land, including unconstrained Greenfield land that can be balanced against more complicated and expensive Brownfield sites to ensure that appropriate levels of Affordable Housing are delivered.<br><br>At this point we would like to confirm that Land North of Iron Acton Way and East of Dyer's Lane, Engine Common, is relatively unconstrained and will be able to deliver Policy compliant levels of Affordable Housing. This further underlines its delivery credentials and appropriateness for allocation. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Robert Lomas - Iron Acton Parish Council |
| **Comment ID** | 15473953/35 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | Dwellings, whether "affordable" or otherwise need in the main to have sufficient space for family growth. Without space to accommodate a partner or arrival of children means families are having to either put up with overcrowded living or move to bigger properties as families develop. This churn works against the development of stable communities. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Margaret Pinder - Sustainable Thornbury |
| **Comment ID** | 19372321/64 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | We support this approach. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anne Gale |

| | |
|---|---|
| **Comment ID** | 16344321/130 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | Accessibility?  Does that mean only if you have a car? |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Leslie Forrest - Campaign to Protect Rural England South Gloucestershire Dist... |
| **Comment ID** | 16478497/245 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | Examination of the houses being built in S. Glos shows that we are a leading contender in the race to the bottom in the size of homes. A random selection from the types of houses on offer by two developers at Park Farm in Thornbury, encompassing sale prices from £300,000 to £585,000 and living space from 3 bed, 5 persons to 5 bed, 10 persons, revealed that not one complies in all respects with the minimum Spatial requirements of the Nationally Described Space Standard. All but the most expensive, fell well short in total area and the size of individual rooms. Surely we should expect that unless exceptional circumstances apply, homes should exceed the minimum dimensions of the National Standard; not as our investigation suggests, become the upper limit to which we aspire. We would like to see S. Glos set standards that align with its espoused aim of creating houses where people want to live; rooms with barely enough space to accommodate the smallest beds in an age of growing obesity, is perverse. As is forcing parking onto the street to free up garages for domestic storage. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Claire Young |
| **Comment ID** | 916289/344 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | Given the demographics of South Gloucestershire, I think that it is important to ensure that a high proportion of homes are large enough to be adapted for those with disabilities. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alveston, Rudgeway, and Earthcott Parish Council |
| **Comment ID** | 19784545/441 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | **No Comment** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Donna Ford - Iron Acton Parish Council |
| **Comment ID** | 1060385/467 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | **Internal Space and Accessibility Standards for Dwellings:**<br><br>Iron Acton Parish Council regards Internal Space and Accessibility Standards as integral to high quality design; to the use of housing by all regardless of ability, age, gender, ethnicity or economic circumstances; and to the flexibility and adaptability of stock. The Parish Council begs to differ with the views of the PSP Plan Inspector quoted in the Prospectus. Consistent with its response to Question 4, above, it considers that South Gloucestershire should have regard to Internal Space and Accessibility Standards when setting requirements for all new homes - irrespective of tenure. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christine Hunter |
| **Comment ID** | 19809025/492 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | **Internal Space and Accessibility Standards for Dwellings:**<br><br>Internal Space and Accessibility Standards are an important part of high quality design and should be specified to ensure housing is usable by all regardless of ability, age, gender, ethnicity or economic circumstances; and that it is flexible and adaptable as needs change. South Gloucestershire should have regard to Internal Space and Accessibility Standards when setting requirements for all new homes - irrespective of tenure. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alan Jones - Hanham District Green Belt Conservation Society |

| | |
|---|---|
| **Comment ID** | 17236353/513 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | A targeted approach is long overdue, but why are SGC not adopting the already published 'Technical Housing Standards - Nationally Described Space Standards' - March 2015??<br><br>No timescale for this has been stated, but surely adopting a published national Document would ensure early implementation. |
| **Attached documents** | Hanham District Green Belt Conservation Society (Alan Jones).pdf (20.3 MB) |

| | |
|---|---|
| **Respondent Name** | Roy Crew |
| **Comment ID** | 3973121/540 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | My Responses to the specific Local Plan Questions:<br><br>Question 10:<br><br>I have no Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Paul Chapman - Iron Acton Parish Council |
| **Comment ID** | 19809537/558 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | **Internal Space and Accessibility Standards for Dwellings:**<br><br>Internal Space and Accessibility Standards are an important part of high quality design and should be specified to ensure housing is usable by all regardless of ability, age, gender, ethnicity or economic circumstances; and that it is flexible and adaptable as needs change. South Gloucestershire should have regard to Internal Space and Accessibility Standards when setting requirements for all new homes - irrespective of tenure. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David Hatherell |
| **Comment ID** | 19830849/573 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | **Internal Space and Accessibility Standards for Dwellings:**<br><br>Internal Space and Accessibility Standards are an important part of high quality design and should be specified to ensure housing is usable by all regardless of ability, age, gender, ethnicity or economic circumstances; and that it is flexible and adaptable as needs change. South Gloucestershire should have regard to Internal Space and Accessibility Standards when setting requirements for all new homes - irrespective of tenure. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | John O'Donnell |
| **Comment ID** | 18604385/584 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | **Internal Space and Accessibility Standards for Dwellings:**<br><br>Internal Space and Accessibility Standards are an important part of high quality design and should be specified to ensure housing is usable by all regardless of ability, age, gender, ethnicity or economic circumstances; and that it is flexible and adaptable as needs change. South Gloucestershire should have regard to Internal Space and Accessibility Standards when setting requirements for all new homes - irrespective of tenure. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Joseph Hatherell |
| **Comment ID** | 19831681/595 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | **Internal Space and Accessibility Standards for Dwellings:** |

| | |
|---|---|
| | Internal Space and Accessibility Standards are an important part of high quality design and should be specified to ensure housing is usable by all regardless of ability, age, gender, ethnicity or economic circumstances; and that it is flexible and adaptable as needs change. South Gloucestershire should have regard to Internal Space and Accessibility Standards when setting requirements for all new homes - irrespective of tenure. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Jane Driver |
| **Comment ID** | 5134785/628 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | **Internal Space and Accessibility Standards for Dwellings:**<br><br>Internal Space and Accessibility Standards are an important part of high quality design and should be specified to ensure housing is usable by all regardless of ability, age, gender, ethnicity or economic circumstances; and that it is flexible and adaptable as needs change. South Gloucestershire should have regard to Internal Space and Accessibility Standards when setting requirements for all new homes - irrespective of tenure. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Diana Porter-Smith |
| **Comment ID** | 10874433/639 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | **Internal Space and Accessibility Standards for Dwellings:**<br><br>Internal Space and Accessibility Standards are an important part of high quality design and should be specified to ensure housing is usable by all regardless of ability, age, gender, ethnicity or economic circumstances; and that it is flexible and adaptable as needs change. South Gloucestershire should have regard to Internal Space and Accessibility Standards when setting requirements for all new homes - irrespective of tenure. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Michael Keenan |
| **Comment ID** | 2796353/651 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | **Internal Space and Accessibility Standards for Dwellings:**<br><br>Internal Space and Accessibility Standards are an important part of high quality design and should be specified to ensure housing is usable by all regardless of ability, age, gender, ethnicity or economic circumstances; and that it is flexible and adaptable as needs change. South Gloucestershire should have regard to Internal Space and Accessibility Standards when setting requirements for all new homes - irrespective of tenure. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Richard Hunter |
| **Comment ID** | 12513441/666 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | **Internal Space and Accessibility Standards for Dwellings:**<br><br>Internal Space and Accessibility Standards are an important part of high quality design and should be specified to ensure housing is usable by all regardless of ability, age, gender, ethnicity or economic circumstances; and that it is flexible and adaptable as needs change. South Gloucestershire should have regard to Internal Space and Accessibility Standards when setting requirements for all new homes - irrespective of tenure. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Zoe Hancock - Bristol Avon Catchment Partnership |
| **Comment ID** | 19832225/685 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | No additional Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Rosemary White |
| **Comment ID** | 10707009/700 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | Internal Space and Accessibility Standards for Dwellings:<br><br>Internal Space and Accessibility Standards are an important part of high quality design and should be specified to ensure housing is usable by all regardless of ability, age, gender, ethnicity or economic circumstances; and that it is flexible and adaptable as needs change. South Gloucestershire should have regard to Internal Space and Accessibility Standards when setting requirements for all new homes - irrespective of tenure. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Purchase |
| **Comment ID** | 2804385/711 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | **Internal Space and Accessibility Standards for Dwellings:**<br><br>Internal Space and Accessibility Standards are an important part of high quality design and should be specified to ensure housing is usable by all regardless of ability, age, gender, ethnicity or economic circumstances; and that it is flexible and adaptable as needs change. South Gloucestershire should have regard to Internal Space and Accessibility Standards when setting requirements for all new homes - irrespective of tenure. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Suzanna Keenan |
| **Comment ID** | 17805057/754 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | **Internal Space and Accessibility Standards for Dwellings:**<br><br>Internal Space and Accessibility Standards are an important part of high quality design and should be specified to ensure housing is usable by all regardless of ability, age, gender, ethnicity or economic circumstances; and that it is flexible and adaptable as needs change. South Gloucestershire should have regard to Internal Space and Accessibility Standards when setting requirements for all new homes - irrespective of tenure. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Simon Whittard |
| **Comment ID** | 12489153/766 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | **Internal Space and Accessibility Standards for Dwellings:**<br><br>Internal Space and Accessibility Standards are an important part of high quality design and should be specified to ensure housing is usable by all regardless of ability, age, gender, ethnicity or economic circumstances; and that it is flexible and adaptable as needs change. South Gloucestershire should have regard to Internal Space and Accessibility Standards when setting requirements for all new homes - irrespective of tenure. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Heather Elgar - West of England Nature Partnership |
| **Comment ID** | 19839553/797 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | Please find below Comments from the West of England Nature Partnership (WENP) in response to the South Gloucestershire Local Plan Consultation.<br><br>For transparency, please know that Dominic Mellon (Consultant in Public Health for South Gloucestershire Council) sits on the WENP Board and thus note a declared conflict of interests. This Response reflects the aims and objectives of the Partnership and does not reflect views of individual Board members.<br><br>Question 10: Internal Space and Accessibility Standards for Dwellings:<br><br>No Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Robert and Diana Pardoe |
| **Comment ID** | 10784545/813 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | **Internal Space and Accessibility Standards for Dwellings:**<br><br>Internal Space and Accessibility Standards are an important part of high quality design and should be specified to ensure housing is usable by all regardless of ability, age, gender, ethnicity or economic circumstances; and that it is flexible and adaptable as needs change. South Gloucestershire should have regard to Internal Space and Accessibility Standards when setting requirements for all new homes - irrespective of tenure. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Brian Hackland |
| **Comment ID** | 8354337/830 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | **Internal Space and Accessibility Standards for Dwellings:**<br><br>Housing that is mean and cramped in room size and design is less adaptable and less desirable. Internal Space and Accessibility Standards are an important part of high quality design and should be specified to ensure housing is usable by all regardless of ability, age, gender, ethnicity or economic circumstances; and that it is flexible and adaptable as needs change. South Gloucestershire should have regard to Internal Space and Accessibility Standards when setting requirements for all new homes - irrespective of tenure. It should make clear that all new housing should provide high quality, adaptable living space. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anna Webster |
| **Comment ID** | 19843617/841 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | **Internal Space and Accessibility Standards for Dwellings:**<br><br>Internal Space and Accessibility Standards are an important part of high quality design and should be specified to ensure housing is usable by all regardless of ability, age, gender, ethnicity or economic circumstances; and that it is flexible and adaptable as needs change. South Gloucestershire should have regard to Internal Space and Accessibility Standards when setting requirements for all new homes - irrespective of tenure. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Victoria & John Vlietstra |
| **Comment ID** | 19843937/852 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | **Internal Space and Accessibility Standards for Dwellings:**<br><br>Internal Space and Accessibility Standards are an important part of high quality design and should be specified to ensure housing is usable by all regardless of ability, age, gender, ethnicity or economic circumstances; and that it is flexible and adaptable as needs change. South Gloucestershire should have regard to Internal Space and Accessibility Standards when setting requirements for all new homes - irrespective of tenure. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christina Fussell |
| **Comment ID** | 19843969/863 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | **Internal Space and Accessibility Standards for Dwellings**<br><br>Internal Space and Accessibility Standards are an important part of high quality design and should be specified to ensure housing is usable by all regardless of ability, age, gender, ethnicity or economic circumstances; and that it is flexible and adaptable as needs change. South Gloucestershire should have regard to Internal Space and Accessibility Standards when setting requirements for all new homes - irrespective of tenure. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Paul Fussell |
| **Comment ID** | 19844001/874 |

| | |
|---|---|
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | **Internal Space and Accessibility Standards for Dwellings:**<br><br>Internal Space and Accessibility Standards are an important part of high quality design and should be specified to ensure housing is usable by all regardless of ability, age, gender, ethnicity or economic circumstances; and that it is flexible and adaptable as needs change. South Gloucestershire should have regard to Internal Space and Accessibility Standards when setting requirements for all new homes - irrespective of tenure. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Oliver Fussell |
| **Comment ID** | 10784449/886 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | **Internal Space and Accessibility Standards for Dwellings:**<br><br>Internal Space and Accessibility Standards are an important part of high quality design and should be specified to ensure housing is usable by all regardless of ability, age, gender, ethnicity or economic circumstances; and that it is flexible and adaptable as needs change. South Gloucestershire should have regard to Internal Space and Accessibility Standards when setting requirements for all new homes - irrespective of tenure. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tom Barnes |
| **Comment ID** | 19844673/897 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | **Internal Space and Accessibility Standards for Dwellings:**<br><br>Internal Space and Accessibility Standards are an important part of high quality design and should be specified to ensure housing is usable by all regardless of ability, age, gender, ethnicity or economic circumstances; and that it is flexible and adaptable as needs change. South Gloucestershire should have regard to Internal Space and Accessibility Standards when setting requirements for all new homes - irrespective of tenure. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Peter Barker - Latteridge Road Community Group |
| **Comment ID** | 6622945/942 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | **Internal Space and Accessibility Standards for Dwellings:**<br><br>Internal Space and Accessibility Standards are an important part of high quality design and should be specified to ensure housing is usable by all regardless of ability, age, gender, ethnicity or economic circumstances; and that it is flexible and adaptable as needs change. South Gloucestershire should have regard to Internal Space and Accessibility Standards when setting requirements for all new homes - irrespective of tenure.<br><br>Modern housing is woefully inadequate in terms of space. Rooms need to be larger and there needs to be better built-in storage solutions. There is a tendency for houses to be built without garages and even without a space for a shed. This is undoubtedly a great bonus to enhance builders' profits but does nothing for social cohesion and the needs of families. Moreover, ALL new homes should be built with double glazing as the minimum standard. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kate Edmonds |
| **Comment ID** | 19883393/953 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | **Internal Space and Accessibility Standards for Dwellings:**<br><br>Internal Space and Accessibility Standards are an important part of high quality design and should be specified to ensure housing is usable by all regardless of ability, age, gender, ethnicity or economic circumstances; and that it is flexible and adaptable as needs change. South Gloucestershire should have regard to Internal Space and Accessibility Standards when setting requirements for all new homes - irrespective of tenure. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David and Tracey Jones |

| | |
|---|---|
| **Comment ID** | 19883585/973 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | **Internal Space and Accessibility Standards for Dwellings:**<br><br>Internal Space and Accessibility Standards are an important part of high quality design and should be specified to ensure housing is usable by all regardless of ability, age, gender, ethnicity or economic circumstances; and that it is flexible and adaptable as needs change. South Gloucestershire should have regard to Internal Space and Accessibility Standards when setting requirements for all new homes - irrespective of tenure. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Cate Davidson - Sodbury Town Council |
| **Comment ID** | 4877793/1017 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | Dear Planning Team,<br><br>Sodbury Town Council responds as follows to the Local Plan (non strategic) Consultation:<br><br>Q. 10 STC supports proposals.<br><br>Please note the Comments as appropriate. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Barwood Development Securities Ltd and The Thornbury Landowner Consortium |
| **Comment ID** | 19884545/1098 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | Please find attached Representation. |
| **Attached documents** | Barwood Development Securities Ltd and The Thornbury Landowner Consortium - Savills (Miss. Felicity Tozer).pdf (650 KB) |

| | |
|---|---|
| **Respondent Name** | Susan E. Green - Home Builders Federation (HBF) |
| **Comment ID** | 10761601/1139 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | If the Council intends to introduce a new Policy requirement for the NDSS and Accessibility Standards in market housing then this should only be done in accordance with criteria set out in the NPPG. The Written Ministerial Statement (WMS) dated 25th March 2015 confirms that "*the optional new national Technical Standards should only be required through any new Local Plan Policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG.*" The NPPG sets out that *"Where a need for Internal Space Standards is identified, Local Planning Authorities should provide justification for requiring Internal Space Policies. Local Planning Authorities should take account of the following areas need, viability and timing"* (ID: 56-020):-<br><br>o Need - It is incumbent on the Council to provide a local assessment evidencing the specific case for Bristol which justifies the inclusion of the NDSS as a Local Plan Policy. If it had been the Government's intention that generic statements justified adoption of the NDSS then the logical solution would have been to incorporate the standards as mandatory via the Building Regulations which the Government has not done. The NDSS should only be introduced on a "need to have" rather than a "nice to have" basis. The identification of a need for the NDSS must be more than simply stating that in some cases the standard has not been met. It should identify the harm caused or may be caused in the future.<br><br>o Viability - The impact on viability should be considered in particular an assessment of the cumulative impact of Policy burdens. There is a direct relationship between unit size, cost per square metre, selling price per metre and affordability. The Council cannot simply expect home buyers to absorb extra costs in a Local Plan area where there exists severe affordability pressures. There is also an impact of larger dwellings on land supply. The requirement for the NDSS would reduce site yields or the number of units on a site. Therefore the amount of land needed to achieve the same number of units must be increased. The efficient use of land is less because development densities have been decreased. At the same time the infrastructure and regulatory burden on fewer units per site intensifies the challenge of meeting residual land values which determines whether or not land is released for development by a willing landowner especially in lower value areas and on Brownfield sites. It may also undermine delivery of Affordable Housing whilst at the same time push additional families into Affordable Housing need because they can no longer afford to buy a NDSS compliant home. The Council should undertake an assessment of these impacts.<br><br>o Timing - The Council should take into consideration any adverse effects on delivery rates of sites included in the housing trajectory. The delivery rates on many sites will be predicated on market affordability at relevant price points of units and maximising absorption rates. An adverse impact on the affordability of Starter Home/first time buyer products may translate into reduced or slower delivery rates. As a consequence the Council should put forward proposals for transitional arrangements. The land deals underpinning the majority of identified sites may have been secured prior to any proposed introduction of the NDSS. These sites should be allowed to move through the Planning System before any proposed Policy requirements are enforced. The NDSS should not be applied to any Outline or detailed Approval prior to the specified date and any Reserved Matters Applications should not be subject to the NDSS.<br><br>With regards to M4(2)/(3) standards the Council should refer to the HBF's answer to Question 9 F above. |

| | |
|---|---|
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Emma Powell - Redrow Homes Limited |
| **Comment ID** | 19737921/1157 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | Part 3 - Policy Discussion Points:<br><br>Section 3 of the Local Plan Consultation sets out the titles of proposed Strategic Polices that will be included in the next version of the Local Plan. As such we do not have any Comments on the titles, but reserve our position to Comment on the detailed wording at the next Consultation. All Policies will need to be prepared in the context of the emerging NPPF, a final version is expected to published in the next few Months. The Strategic Policies will also need to reflect any changes to the West of England JSP as it progresses through the Examination towards adoption anticipated later in 2019.<br><br>**Question 10:**<br><br>**G. Internal Space and Accessibility Standards for Dwellings**<br><br>**Do you have any views on our intended approach to Internal Space and Accessibility Standards?**<br><br>It is noted that the Council intends to retain Policy PSP37 which currently only applies to Affordable Housing, but that it intends to investigate if the Policy could apply to market housing.<br><br>If the Council intends to introduce a new Policy requirement for the NDSS and accessibility standards in market housing then this should only be done in accordance with criteria set out in the NPPG. The Written Ministerial Statement (WMS) dated 25th March 2015 confirms that *"the optional new national Technical Standards should only be required through any new Local Plan Policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG."* The NPPG sets out that "*Where a need for Internal Space Standards is identified, Local Planning Authorities should provide justification for requiring Internal Space Policies. Local Planning Authorities should take account of the following areas need, viability and timing*" (ID: Paragraph: 020 Reference ID: 56-020-20150327). This covers, need, viability and timing. |
| **Attached documents** | Redrow Homes Limited (Emma Powell) - Pegasus Group (Mrs. Sarah Hamilton-Foyn).pdf (34.1 MB) |

| | |
|---|---|
| **Respondent Name** | Phill Bamford - Gladman Developments Ltd |
| **Comment ID** | 15612065/1181 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | ## 4.4 Question 10 – Internal Space and Accessibility Standards:<br><br>4.4.1 Gladman remind the Council that any Policy including specific requirements for Design and Space Standards should be tested through the whole Plan viability assessment.<br><br>4.4.2 The PPG provides additional guidance on the use of these Optional Standards. The Council need to ensure that any Policy is in line with the guidance and that the justification and specific details of the Policy take into account the various factors which the PPG refers to:<br><br>*"Based on their Housing Needs Assessments and other available datasets it will be for the Local Planning Authorities to set out how they intend to approach demonstrating the need for Requirement M4(2) (Accessible and Adaptable Dwellings), and/or M4(3) (Wheelchair User Dwellings), of the Building Regulations. There is a wide range of published official statistics and factors which Local Planning Authorities can consider and take into account, including:*<br><br>• *The likely future need for older and disabled people (including Wheelchair User Dwellings);*<br>• *Size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes, or care homes);*<br>• *The accessibility and adaptability of existing stock;*<br>• *How needs vary across tenures;*<br>• *The overall impact on viability."* (ID: 56-007-20150327)<br><br>4.4.3 When seeking to apply the optional standard for accessibility, it must be remembered that the Government has not made this a mandatory standard and therefore it is not considered necessary for all homes to be built to Part M4(2). Therefore, there would need to be sufficient evidence to justify the Council's position.<br><br>4.4.4 In addition to concerns regarding M4(2), Gladman also believe that the requirement for the provision of Category 3 (Wheelchair User Dwellings) could be too onerous unless this has been justified by sufficient evidence. This requirement could have negative impacts on scheme viability and in turn the delivery of much needed housing across the District. In order to be able to include such a requirement with the Local Plan, the Council will need to be able to robustly justify the inclusion and demonstrate that consideration has been given to this requirement within the |

| | |
|---|---|
| | Viability Study. The provision of M4(3) Wheelchair User Dwellings is far more onerous in terms of size requirements. Therefore, it is crucial that implications of the proposed Policy requirement have been properly considered. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Bovis Homes Limited |
| **Comment ID** | 20044801/1204 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | Please refer to enclosed letter. |
| **Attached documents** | Bovis Homes Limited - Rapleys LLP (Mr. Tony Clements).pdf (259 KB) |

| | |
|---|---|
| **Respondent Name** | Helen Johnstone - Stroud District Council |
| **Comment ID** | 14317537/1228 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | No Comments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | IM Land Ltd and The Davison Family |
| **Comment ID** | 19925889/1294 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | Please see enclosed Representations Report on behalf of IM Land Ltd and The Davison Family prepared by Peter Brett Associates dated 30th April 2018. |
| **Attached documents** | IM Land Ltd and The Davison Family - Peter Brett Associates (Mr. Colin Danks).pdf (673 KB) |

| | |
|---|---|
| **Respondent Name** | Bloor Homes South West |
| **Comment ID** | 20096097/1308 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | We do not support the Council's intention set out under Section G of Page 83 of the Consultation Document where it appears to wish to impose Internal Space and Accessibility Standards on all new dwellings. Our reasoning is similar to that set out above in relation to Affordable units, namely that the Council have not provided any evidence that there is a need to moderate the standard of dwellings currently being delivered in the District. Unless there is a clear need for standards to be universally imposed due to evidenced shortfall in living standards in new developments, then the Council has no justification for interfering within the housing market to control the detail of dwellings delivered to this extent. No evidence has been presented to suggest a blanket requirement such as this is necessary. Furthermore, no viability evidence has been presented to assess what impact, if any, this would have with regard to the viability of developments.<br><br>It is relevant that the previous PSP DPD Inspector considered a similar issues in respect of previous proposals for space standards within that Plan stating that (IR Para 63) "*These standards should only be required if they address a clearly evidenced need, and where their impact on viability has been considered. Further, it is clear in the PPG that the standards should be justified by locally specific data concerning the population of the area and the nature of new build housing and the existing housing stock (Paragraphs 007 Reference ID: 56-007-20150327; and 020 Reference ID: 56-020-20150327 in particular*." Concluding overall that a more targeted approach may be appropriate in the New Local Plan, but not the universal approach that was proposed. No such targeted approach seems to be proposed.<br><br>We do not object to the principle of delivering high quality market and Affordable Housing that meets the reasonable amenity requirements of future occupiers. We do object to the Council imposing a potentially restrictive obligation, without evidence/justification, and without proper consideration of its implications.<br><br>We request that the Council provide further justification to address the above Comments should it desire to impose this Policy going forward. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Adrian Edmonds |
| **Comment ID** | 19926305/1343 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | **Internal Space and Accessibility Standards for Dwellings:**<br><br>Internal Space and Accessibility Standards are an important part of high quality design and should be specified to ensure housing is usable by all regardless of ability, age, gender, ethnicity or economic circumstances; and that it is flexible and adaptable as needs change. South Gloucestershire should have regard to Internal Space and Accessibility Standards when setting requirements for all new homes - irrespective of tenure. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Jeremy Sutcliffe - Barratt |
| **Comment ID** | 19927297/1395 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | The Housing Standards Review (2013) was intended to simplify the Housing Standards which Local Authorities applied to development. A fundamental aim of the Review was to reduce developer costs, irregularity in standards applied between Councils and to seek to encourage housing delivery. As a result of the Review, Building Regulations have been updated and provide the mandatory baseline standards which apply nationwide to all developments. The Government also created a series of enhanced Optional Standards relating to access and water, along with a new optional national standard on Internal Space.<br><br>A Ministerial Statement dated 25th March 2015 led to the creation of a new Section on optional Technical Standards in the National Planning Practice Guidance (NPPG). This was also underpinned by existing Policy within the National Planning Policy Framework (NPPF).<br><br>Paragraphs 174 and 177 of the NPPF make it clear that via the Local Plan process LPAs should assess the cumulative impact of Policy burdens, including Housing Standards, to ensure that it does not put implementation of the Plan at serious risk.<br><br>The Ministerial Statement stated: "The optional new national Technical Standards should only be required through any new Local Plan Policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the National Planning Policy Framework and Planning Guidance."<br><br>Furthermore, Paragraph 001 (Reference ID: 56-001-20150327) of the Planning Practice Guidance requires LPAs to gather evidence to determine whether there is a need for additional standards in their area and justify setting appropriate Policies in their Local Plans. It goes on to recognise that LPAs should consider the impact of using such Standards as part of their Local Plan Viability Assessment.<br><br>It is clear from the guidance in the PPG that enhanced Standards are intended to be optional and that they are only likely to be needed and viable in certain local circumstances. Otherwise, they would have been made mandatory in Building Regulations across the country. The application of the enhanced sizes has the potential to have significant implications in terms of product range, build cost, affordability and consumer choice, cumulative Policy burden, viability and ultimately housing delivery. It is for this reason that Barratt is opposed to blanketly applying the Nationally Described Space Standards.<br><br>If the Council chooses to progress with further Regulations in respect of Nationally Described Space Standards we recommend the following:<br><br>As with any new Policy introduced through a new Local Plan, clear evidence of need should be presented in order to justify that imposing Space Standards is necessary. This should also consider the alternatives considered and why the imposition of such Standards has been selected as the most appropriate Strategy.<br><br>Furthermore, the impact that any such proposal would have on viability would need to be fully examined. Consideration should be given to the effect that application of the Policy would have on all types of development. For example, adoption of the Nationally Described Space Standards on all housing will have a significant impact on sites which were previously considered to be borderline viable. This is likely to be most acute on large strategic sites which are infrastructure; or Brownfield sites, the delivery of which is critical if the Council is to deliver the level of housing required to meet needs. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Daniel Kelly - South Gloucestershire Liberal Democrat Council Group |
| **Comment ID** | 10311137/1443 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | We are concerned about the increased tendency to build smaller and smaller homes, but appreciate that these need to be balanced against the problems of affordability. Smaller homes may be appropriate for some people, but not for others. Ideally any Policy to regulate the internal space of dwellings would be done on a percentage basis, to ensure there are a range of sizes of home available for a range of differing needs. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Rebecca Thompson - Wallace Land Investments |
| **Comment ID** | 19935809/1476 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | Similarly to our Response to Question 9 above, if the Council intends to introduce a new Policy requirement for the NDSS and Accessibility Standards in market housing then this should only be done in accordance with criteria set out in the NPPG. The Written Ministerial Statement (WMS) dated 25th March 2015 confirms that "*the optional new national Technical Standards should only be required through any new Local Plan Policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG.*" The NPPG sets out that *"Where a need for Internal Space Standards is identified, Local Planning Authorities should provide justification for requiring Internal Space Policies. Local Planning Authorities should take account of the following areas need, viability and timing"* (ID: 56-020).<br><br>This required justification on need, viability and timing has not yet been made available by the LPA. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hannah Saunders - Dodington Parish Council |
| **Comment ID** | 19931969/1616 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |

| | |
|---|---|
| **Comment** | **COMMENTS:**<br><br>Members support the proposed Council approach to Internal Space and Accessibility Standards for all new build dwellings. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | E. H. Schubert Will Trust |
| **Comment ID** | 12403425/1682 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | There has been a significant reduction in dwelling space for Decades. In 2011, the RIBA raised concerns over just what appeared to be small percentage reductions in house and apartment size affecting the usability and flexibility of homes. In October 2017, the ONS reported that in 2016 the average house sold in England and Wales was 104 sq. m excluding bathrooms, corridors, hallways and landings; for flats it was 49 sq. m.<br><br>Where compared to other countries, Germany, Italy, France, Scotland, Spain and Portugal had a larger average size. In Luxembourg, the average presented by the ONS was 131 sq. m. It is unreasonable for further restrictions to be placed on house sizes and on this basis the Council should consider how the living conditions of existing and future residents. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | G. E. Forward |
| **Comment ID** | 20176577/1718 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | There is a published Technical Housing Standards - Nationally Described Space Standards why are you not using this? |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Bloor Homes |
| **Comment ID** | 17351489/1741 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | **5.0 POLICY DISCUSSION POINTS:**<br><br>5.1 Part 3 of the New Local Plan Consultation Document lists the Strategic Development Policies that will be included in the New Local Plan(i.e. covering residential, employment, retail, transport and nationally significant infrastructure projects), as well as the more detailed Policy areas. Specific Policy wording is not provided at this stage. Instead, the Consultation Document examines a series of Policy discussion points under detailed Policy headings.<br><br>5.2 Bloor Homes objects to Policy G: Internal Space and Accessibility Standards for dwellings; and Policy M: Energy Management in new development, further explained below.<br><br>**G – Internal Space and Accessibility Standards for Dwellings:**<br><br>5.3 South Gloucestershire Council previously proposed a requirement for open market housing to meet the national Space and the Accessibility Standards. However, this was found to be unsound in the Examination into the South Gloucestershire Policies, Sites and Places Plan where the Inspector stated:<br><br>5.4 “There is no evidence to suggest that the existing housing stock in South Gloucestershire is particularly small; and, while some recently built market units do not meet the NDSS, others exceed it and there is no evidence of a systemic problem” and he concluded… “The evidence does not justify the universal approach [to Internal Space and Accessibility Standards] in PSP37.”<br><br>5.5 Following Main Modifications, the proposed Policy PSP37 was amended to only apply the Standards to Affordable Housing.<br><br>5.6 As part of the New Local Plan, the Council are looking to revisit open market housing meeting the national Internal and Accessibility Standards in the District. Any such attempts will need to be backed up by evidence on need and viability. However, we note that the Inspector’s Report into the Policies, Sites and Places Plan is very recent, dated 21st September 2017, and the circumstances in South Gloucestershire are not considered to have changed significantly since the Inspector reported, thus showing the potential for such a Policy to be unnecessary and unsound.<br><br>**Policy Discussion Points:**<br><br>6.12 Bloor Homes object to the proposals for an Internal Space and Accessibility Standards for dwellings (Policy G) as there is no evidence to suggest that this is needed and therefore, such a Policy would be unnecessary and unsound. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David Jonathan Redgewell - South Gloucestershire Disability Forum, Bus User U... |
| **Comment ID** | 20209409/1917 |

| | |
|---|---|
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | Questions 8, 9, and 10.<br><br>Welcome Policy PSP37.<br><br>Policy M42 M42,<br><br>Lifetime home standards.<br><br>But we are very concerned about the Wider Bristol SHMA 2016 and the need to review Wheelchair adapted standards in Lifetime homes. There is a shortage of Wheelchair accessible Homes for younger people in South Gloucestershire in rural vilages.<br><br>Welcome Affordable Housing in Extra Care Housing development but needs for Housing are not being addressed for young disabled people under 55.<br><br>An investigation is welcomed for Internal Space and Accessibility Standard of dwelling is being address but this appears not to comply with the Equalities Act 2010 and is discrimination of protected caretakers.<br><br>We need to address the need of young disabled people in the market housing system not Just the over 55s and 85s.<br><br>It is important to address this issue. We welcome a discussion with the Council on Design Standards for Wheelchair users and those with mobility issues. The ISSUE needs to be addressed within the private rented market as well as within the social rented market.<br><br>Also with a Larger retirement population in South West England, Greater Bristol, and rural South Gloucestershire.<br><br>The NPPF requires a Local Plan and Affordable Housing must meet option Building Regulation part ML(3).<br><br>Question 9 - View is clear. South Gloucestershire is not providing enough Affordable Housing with access needs.<br><br>Welcome retaining policy PSP37. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Bloor Homes (South West) |
| **Comment ID** | 20211105/1951 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | Please find attached Representation. |
| **Attached documents** | Local Plan 2018-36 - Coalpit Heath.pdf (205 KB)<br>Appendix 1 - Part 4.pdf (6.0 MB)<br>Appendix 1 - Part 2.pdf (6.7 MB)<br>Appendix 1 - Part 1.pdf (11.3 MB)<br>Appendix 1 - Part 6.pdf (17.4 MB)<br>Appendix 2.pdf (453 KB)<br>Appendix 1 - Part 3.pdf (7.3 MB)<br>Appendix 1 - Part 5.pdf (6.4 MB) |

| | |
|---|---|
| **Respondent Name** | JFG Gunnery |
| **Comment ID** | 19741793/1983 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | In October 2017, the ONS reported that in 2016 the average house sold in England and Wales was 104 sq.m excluding bathrooms, corridors, hallways and landings; for flats it was 49 sq.m. For Decades, there has been a significant reduction in the overall size of dwellings. In 2011, the RIBA raised concerns over just what appeared to be small percentage reductions in house and apartment size affecting the usability and flexibility of homes.<br><br>Where compared to other countries, Germany, Italy, France, Scotland, Spain and Portugal had a larger average size. In Luxembourg the average presented by the ONS was 131 sq.m. It is unreasonable for further restrictions to be placed on home sizes. On this basis, the Local Authority should consider Policies that can enhance living conditions of existing and future residents. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sue Hope |
| **Comment ID** | 411169/2038 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | **Internal Space and Accessibility Standards for Dwellings:**<br><br>I am concerned about the increased tendency to build smaller and smaller homes, but appreciate that there needs to be balanced against the problems of affordability. Smaller homes may be appropriate for some people, but not for others. Ideally any Policy to regulate the internal space of dwellings would be done on a percentage basis, to ensure there are a range of sizes of home available for a range of differing needs. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sebastian Loyn - YTL Developments (UK) Limited |
| **Comment ID** | 19779841/2080 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | G: Internal Space and Accessibility Standards for Dwellings:<br><br>YTL look forward to seeing the Emerging Policy findings and would welcome Consultation at the appropriate stage. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alex Atkinson - Edward Ware Homes (Land East of Coalpit Heath) |
| **Comment ID** | 20247169/2109 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Edward Ware Homes (Mr. Alex Atkinson) - Pegasus Group (Mr. Daniel Weaver).pdf (57.6 MB) |

| | |
|---|---|
| **Respondent Name** | Paul Davis - Persimmon Homes Severn Valley |
| **Comment ID** | 3553569/2147 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | Question 10 – Internal Space and Accessibility Standards for Dwellings:<br><br>8.23 In considering refining the Planning Policy for Internal and Accessibility Standards for dwellings, the Council need to recognise that Building Standards are principally a Building Regulation matter. The Building Regulations start from a premise that all dwellings should be built to Part M Standards and anything in excess of that has to be clearly evidenced by need and *'where their impact on viability has been considered in accordance with the NPPG'* (WMS 25th March 2015). In this respect, the direction of travel of Government guidance set out in Draft PPG is that *'the role for viability is primarily at the Plan-making stage'* and that *'the use of Viability Assessment at the decision-making stage should not be necessary.'* In addition, NPPG says Local Planning Authorities should take account of need, viability and timing (ID56-020). NPPG ID56-020 also says *'Where a need for Internal Space Standards is identified, Local Planning Authorities should provide justification for requiring Internal Space Policies.'* These should take account of need, viability and timing.<br><br>8.24 The Council should approach the evidence gathering requirements objectively and demonstrate a clear need to impose any standards rather than rely on statistical evidence of numbers of elderly people to justify accessibility standards.<br><br>8.25 In considering viability, the Council need to take into account:<br><br>- Increased build costs on affordability;<br><br>- Impact on land values;<br><br>- The impact of larger units on land supply.<br><br>8.26 In respect of timing, the Council should consider transitional arrangements to take account of land deals in place at the time of adoption and enable such sites to come forward without being burdened by increased standards. Then in respect of new sites the implications of adopting Minimum Space Standards on the market for new homes needs to be taken into account. For example, PHSV have two entry level units which do not generally meet Space Standards, but they sell well, quite often off Plan. This demonstrates the market wants units at lower price points, principally for first-time buyers. Requiring Minimum Space Standards means these smaller units cannot be provided, which has the effect of raising the price of the entry level units and people at the margins, who could have afforded to buy, no longer can. In the case of both Space Standards and Accessibility Standards, it is for the Plan to provide the evidence and Viability Assessment for applying the standards, not for the house builder or developer to show why they should not apply. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | CEG and The Charfield Landowners Consortium |
| **Comment ID** | 16664993/2220 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | **G: Internal Space and Accessibility Standard for Dwellings:**<br><br>Our Client does not oppose the application of Design, Space and Accessibility Standards in principle; however, it is important that such Standards are not more onerous than the national Technical Standards (or their successor). Policy relating to such Standards should also allow flexibility to take account of the circumstances of different locations, sites and proposals. It should also recognise that well-designed alternatives can also achieve good living and accessibility. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Amanda Scott |
| **Comment ID** | 20374561/2294 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | **Internal Space and Accessibility Standards for Dwellings:**<br><br>Internal Space and Accessibility Standards are an important part of high quality design and should be specified to ensure housing is usable by all regardless of ability, age, gender, ethnicity or economic circumstances; and that it is flexible and adaptable as needs change. South Gloucestershire should have regard to Internal Space and Accessibility Standards when setting requirements for all new homes - irrespective of tenure. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Fortannia Ltd |
| **Comment ID** | 19741217/2333 |
| **Document Part Name** | Question 10 - Internal Space and Accessibility Standards for Dwellings |
| **Comment** | **Qu.10 Internal Space and Accessibility Standards for Dwellings. Do you have any views on our intended approach to Internal Space and Accessibility Standards?**<br><br>There has been a significant reduction in dwelling space for Decades. In 2011, the RIBA raised concerns over just what appeared to be small percentage reductions in house and apartment size affecting the usability and flexibility of homes. In October 2017, the ONS reported that in 2016 the average house sold in England and Wales was 104 sq.m excluding bathrooms, corridors, hallways and landings; for flats it was 49 sq.m.<br><br>Where compared to other countries, Germany, Italy, France, Scotland, Spain and Portugal had a larger average size. In Luxembourg the average presented by the ONS was 131 sq.m. It is unreasonable for further restrictions to be placed on home sizes. On this basis, the Council should consider Policies that can enhance living conditions of existing and future residents. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | John Abrahams |
| **Comment ID** | 19430017/138 |
| **Document Part Name** | Question 11 - Residential Conversions, Sub-Divisions and Houses in Multiple Occupation |
| **Comment** | I support the intention to replace the current PSP39 in connection to HMOs.<br><br>A concentration of HMOs has led to a reduction in the wellbeing of my local area, . Night time noise levels and issues with uncollected refuse and litter, have increased with the expansion of HMOs in the Estate. In some streets there appear to be as many, if not more, HMOs than standard residential accommodation. The balance between the mixed demands of our housing stock and the needs of residents does appear to have tilted away from the original plan for this area. So whilst accepting the need for mixed types of accommodation across our Estates, some control over ratios is necessary to ensure the needs of families, students and other residents is met. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Helen Johnstone - Stroud District Council |
| **Comment ID** | 14317537/258 |
| **Document Part Name** | Question 11 - Residential Conversions, Sub-Divisions and Houses in Multiple Occupation |
| **Comment** | 1. HMOs can and do provide a vital low-cost housing option to some households. There could also be consideration of whether protection may be needed for HMOs in certain areas from being lost through redevelopment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Abraham |
| **Comment ID** | 19467073/333 |
| **Document Part Name** | Question 11 - Residential Conversions, Sub-Divisions and Houses in Multiple Occupation |

| | |
|---|---|
| **Comment** | Comment on Question 11:<br><br>Support a revised Policy approach in relation to HMOs. Existing Policy PSP39 requires replacing as it is not as effective as it could be in preventing the loss of mixed and balance communities, particularly in areas adjacent to and in the vicinity of the University of the West of England, Frenchay Campus. There is already evidence of family properties within Stoke Park being sandwiched between HMOs. This is an example of an area which is already experiencing a high concentration of HMOs, which has resulted in changes to the mix and balance and visual amenity of the Stoke Park Housing Estate. The report on the proposed use of an Article 4 for HMOs recommended that further consideration be given through the new South Gloucestershire Local Plan process. The Report makes specific references to Stoke Park and refers to the need to consider a new Policy together with the introduction of Article 4.<br><br>Adjoining Authorities take a more pro-active approach to HMOs in areas affected by University Students and already have Article 4 Directions in relation to HMOs in place. Given that the West of England Authorities are working together, an approach such as that proposed in the new Bristol Local Plan (refer to proposal ULH 7, P. 42) should also be implemented within South Glos to ensure consistency in approach going forward.<br><br>A more focused approach with a specific Policy replacing PSP39 is required, with enhanced controls of HMO development to ensure harmful impacts and/or concentrations do not occur. A guideline should also be introduced stating the maximum percentage of housing stock in a given area to be occupied by HMOs. This would also provide greater clarity on the suitability of new proposed HMO development particularly within the existing and developing areas in close proximity of UWE. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Claire Young |
| **Comment ID** | 916289/345 |
| **Document Part Name** | Question 11 - Residential Conversions, Sub-Divisions and Houses in Multiple Occupation |
| **Comment** | I support a revised Policy approach to enable proportionate use of Article 4 Directions in order to prevent over-concentration of HMOs and to retain balanced and mixed communities. I agree with the criteria identified. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tristan Clark |
| **Comment ID** | 19194177/365 |
| **Document Part Name** | Question 11 - Residential Conversions, Sub-Divisions and Houses in Multiple Occupation |
| **Comment** | A revised approach should be pursued in order to prevent an abundance of HMOs in a given area compelling individuals, couples and families to move out of that neighbourhood in search of viable and affordable housing. The use of Article 4 Direction should be judiciously pursued in order to limit the harm this does to the aforementioned groups and to diversity within a community. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Simmons - Westerleigh Parish Council |
| **Comment ID** | 17221409/410 |
| **Document Part Name** | Question 11 - Residential Conversions, Sub-Divisions and Houses in Multiple Occupation |
| **Comment** | **11H. Residential Conversions, Sub-Divisions and Houses in Multiple Occupation:**<br><br>**Do you have any comments on the above options for Houses in Multiple Occupation?**<br><br>**WPC consider that Article 4 Directions should be available to SGC to protect areas from harm.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alveston, Rudgeway, and Earthcott Parish Council |
| **Comment ID** | 19784545/442 |
| **Document Part Name** | Question 11 - Residential Conversions, Sub-Divisions and Houses in Multiple Occupation |
| **Comment** | **Case by case** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | J. Bond |
| **Comment ID** | 17779105/480 |
| **Document Part Name** | Question 11 - Residential Conversions, Sub-Divisions and Houses in Multiple Occupation |

| | |
|---|---|
| **Comment** | With regard to the conversion of terraced and semi-detached houses, what was previously only bedrooms on the first floor, could result in a living room adjacent to a bedroom, separated by only an inadequately sound insulated Party Wall. Resulting in health problems due to noise pollution.<br><br>Owners and builders should be made more aware of the provisions of the "Party Wall etc" Act.<br><br>Despite the Council's desire for multi-modal, non car, transport, adequate provision should be made for parking including visitors and deliveries. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alan Jones - Hanham District Green Belt Conservation Society |
| **Comment ID** | 17236353/514 |
| **Document Part Name** | Question 11 - Residential Conversions, Sub-Divisions and Houses in Multiple Occupation |
| **Comment** | SGC appear to be late in addressing this problem and no timescale given for implementation.<br><br>Cannot fully understand what 'harm' the Policy is alluding to!<br><br>Part 3 - How do SGC intend to do this 'Promoting development of accommodation types…" Slow HMO growth?? |
| **Attached documents** | Hanham District Green Belt Conservation Society (Alan Jones).pdf (20.3 MB) |

| | |
|---|---|
| **Respondent Name** | Roy Crew |
| **Comment ID** | 3973121/541 |
| **Document Part Name** | Question 11 - Residential Conversions, Sub-Divisions and Houses in Multiple Occupation |
| **Comment** | My Responses to the specific Local Plan Questions:<br><br>Question 11:<br><br>Most accommodation in the area is under utilised and the Council should promote better occupancy. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Zoe Hancock - Bristol Avon Catchment Partnership |
| **Comment ID** | 19832225/686 |
| **Document Part Name** | Question 11 - Residential Conversions, Sub-Divisions and Houses in Multiple Occupation |
| **Comment** | No additional Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Amy Shepherd - Somerset County Council |
| **Comment ID** | 11460449/728 |
| **Document Part Name** | Question 11 - Residential Conversions, Sub-Divisions and Houses in Multiple Occupation |
| **Comment** | The Consultation seeks Response to a number of Questions and the County Council Acoustics Specialist considers noise and vibration may be pertinent to the following:<br><br>**Question 11:**<br><br>***Residential Conversions, Sub-Divisions and Houses in Multiple Occupation:***<br><br>**Do you have any Comments on the above options for Houses in Multiple Occupation?**<br><br>The intention to reconsider PSP39 (Residential Conversions - Sub-Divisions and Houses in Multiple Occupation) may provide opportunity to better express the need to consider vibration impacts in housing design. |

| | |
|---|---|
| | While PSP39 identifies a requirement to '*provide adequate amenity space*' it does not identify the requirement to create '*space that exhibits adequate amenity*' and relies on the supporting text(8.28) to direct the reader to consider PSP8: Residential Amenity. A more direct reference in PSP39 to provide adequate amenity and to link with PSP8 requirements would then help to identify the need for the mitigation of noise and vibration impacts created by, or inflicted on these HMO developments.<br><br>The County Council Acoustics Specialist hopes these Comments are considered helpful. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Heather Elgar - West of England Nature Partnership |
| **Comment ID** | 19839553/798 |
| **Document Part Name** | Question 11 - Residential Conversions, Sub-Divisions and Houses in Multiple Occupation |
| **Comment** | Please find below Comments from the West of England Nature Partnership (WENP) in response to the South Gloucestershire Local Plan Consultation.<br><br>For transparency, please know that Dominic Mellon (Consultant in Public Health for South Gloucestershire Council) sits on the WENP Board and thus note a declared conflict of interests. This Response reflects the aims and objectives of the Partnership and does not reflect views of individual Board members.<br><br>Question 11: Residential Conversions, Sub-divisions, and Houses in Multiple Occupation:<br><br>No Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Cate Davidson - Sodbury Town Council |
| **Comment ID** | 4877793/1018 |
| **Document Part Name** | Question 11 - Residential Conversions, Sub-Divisions and Houses in Multiple Occupation |
| **Comment** | Dear Planning Team,<br><br>Sodbury Town Council responds as follows to the Local Plan (non strategic) Consultation:<br><br>Q. 11  STC agrees with the revised Policy options.<br><br>Please note the Comments as appropriate. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Barwood Development Securities Ltd and The Thornbury Landowner Consortium |
| **Comment ID** | 19884545/1099 |
| **Document Part Name** | Question 11 - Residential Conversions, Sub-Divisions and Houses in Multiple Occupation |
| **Comment** | Please find attached Representation. |
| **Attached documents** | Barwood Development Securities Ltd and The Thornbury Landowner Consortium - Savills (Miss. Felicity Tozer).pdf (650 KB) |

| | |
|---|---|
| **Respondent Name** | Emma Powell - Redrow Homes Limited |
| **Comment ID** | 19737921/1158 |
| **Document Part Name** | Question 11 - Residential Conversions, Sub-Divisions and Houses in Multiple Occupation |
| **Comment** | Part 3 - Policy Discussion Points:<br><br>Section 3 of the Local Plan Consultation sets out the titles of proposed Strategic Polices that will be included in the next version of the Local Plan. As such we do not have any Comments on the titles, but reserve our position to Comment on the detailed wording at the next Consultation. All Policies will need to be prepared in the context of the emerging NPPF, a final version is expected to published in the next few Months. The Strategic Policies will also need to reflect any changes to the West of England JSP as it progresses through the Examination towards adoption anticipated later in 2019. |

| | |
|---|---|
| | **Question 11:**<br><br>**H. Residential Conversions, Sub-Divisions and Houses in Multiple Occupation**<br><br>**Do you have any Comments on the above options for Houses in Multiple Occupation?**<br><br>No Comments. |
| **Attached documents** | Redrow Homes Limited (Emma Powell) - Pegasus Group (Mrs. Sarah Hamilton-Foyn).pdf (34.1 MB) |

| | |
|---|---|
| **Respondent Name** | Richard Bull - Environment Agency |
| **Comment ID** | 11527745/1256 |
| **Document Part Name** | Question 11 - Residential Conversions, Sub-Divisions and Houses in Multiple Occupation |
| **Comment** | **Specific Policy Discussion Points:**<br><br>H. Residential Conversions, Sub-Divisions and Houses in Multiple Occupation:<br><br>Standard Environment Agency Consultation will be required, in accordance with normal Consultation procedures, including Local and National Flood Risk Standing Advice. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Daniel Kelly - South Gloucestershire Liberal Democrat Council Group |
| **Comment ID** | 10311137/1444 |
| **Document Part Name** | Question 11 - Residential Conversions, Sub-Divisions and Houses in Multiple Occupation |
| **Comment** | We would support a revised Policy approach to allow for proportionate use of Article 4 Directions in order to prevent overconcentration of HMOs and to maintain balanced and mixed communities. We agree with the criteria identified to weigh the appropriateness of using an Article 4 Direction. We also believe that any Article 4 Direction should only be made as a result of an Executive Decision. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hannah Saunders - Dodington Parish Council |
| **Comment ID** | 19931969/1617 |
| **Document Part Name** | Question 11 - Residential Conversions, Sub-Divisions and Houses in Multiple Occupation |
| **Comment** | **COMMENTS:**<br><br>Members are aware that later this year the Licensing Laws for HMOs will be changing….. along with these changes it is a good time to address the issue – and if a revised approach is to be considered then it is important that detailed community Consultation is carried out once the Council has investigated the way forward.<br><br>The one area that is key to this Policy is ensure that Parking Standards are adequate… |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | E. H. Schubert Will Trust |
| **Comment ID** | 12403425/1683 |
| **Document Part Name** | Question 11 - Residential Conversions, Sub-Divisions and Houses in Multiple Occupation |
| **Comment** | No Comments at this time. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | G. E. Forward |
| **Comment ID** | 20176577/1719 |
| **Document Part Name** | Question 11 - Residential Conversions, Sub-Divisions and Houses in Multiple Occupation |
| **Comment** | No timescale given for implementation. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David Jonathan Redgewell - TSSA, South West Transport Network, Railfuture, Bu... |
| **Comment ID** | 20207905/1912 |
| **Document Part Name** | Question 11 - Residential Conversions, Sub-Divisions and Houses in Multiple Occupation |
| **Comment** | Question 11 - Residential Conversion, Sub-division.<br><br>PSP39.<br><br>PSP39 fails to address the issue of HMOs around UWE in Crestwick Village Filton around, Filton Avenue, Stoke Gifford, and Bradley Stoke.<br><br>Policy needs to be clear in this area where family housing is being Lost to HMOs.<br><br>When will the Council address this Issue of student blocks and student housing to be built around UWE in Creswick Village, Coldharbour Lane, Lockleaze in Bristol.<br><br>Creswick Village and Lockleaze need a Master plan for student blocks.<br><br>The Council Could Look at the Plan for OLDFIELD PARK in Bath or Bristol City Council in CLIFTON Area.<br><br>Student housing needs to be on Key bus routes Linking UWE to the City Centre and Bower Ashton.<br><br>There is a danger that new homes being built next to the Stoke Gifford Transport Link Will become HMOs for UWE Students.<br><br>The Policy is not addressing these issues in terms of the Stoke Gifford new community. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Bloor Homes (South West) |
| **Comment ID** | 20211105/1952 |
| **Document Part Name** | Question 11 - Residential Conversions, Sub-Divisions and Houses in Multiple Occupation |
| **Comment** | Please find attached Representation. |
| **Attached documents** | Local Plan 2018-36 - Coalpit Heath.pdf (205 KB)<br>Appendix 1 - Part 5.pdf (6.4 MB)<br>Appendix 1 - Part 4.pdf (6.0 MB)<br>Appendix 1 - Part 2.pdf (6.7 MB)<br>Appendix 1 - Part 1.pdf (11.3 MB)<br>Appendix 1 - Part 6.pdf (17.4 MB)<br>Appendix 2.pdf (453 KB)<br>Appendix 1 - Part 3.pdf (7.3 MB) |

| | |
|---|---|
| **Respondent Name** | Margaret Pinder - Sustainable Thornbury |
| **Comment ID** | 19372321/65 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | We support the approach set out.  In particular we support the requirement for actual/potential EV charging points, given the Government's plans to remove petrol/diesel vehicles. It would be useful to include such requirements in all future car park developments also. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mayers |
| **Comment ID** | 16271713/98 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | All new homes and developments should have this built in from the beginning, along with Solar Panels. This would create cleaner air and a better environment to live in, New commercial areas should also have this built in when developed and the older sites should have the oppporutnity to have these installed in their car parks, this would make a big impact as I know in the office I work in I have been approached about electric cars and whether we can install a charging point. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Philip Box |
| **Comment ID** | 19453025/201 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | All possible opportunities to promote electric charging points, in both new builds and older housing, should be utilised. Air pollution concerns and efforts to reduce emissions require substantial reductions in transport, with electric vehicles a key recommendation of the Committee on Climate Change (CCC). |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Gillian Sanders - Wessex Water |
| **Comment ID** | 19455361/237 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | There is the need to examine proactive Policies that discourage single occupancy vehicle usage. Electric vehicles although preferable still contribute towards congestion and the competing demands on the public realm. We welcome the paradigm shift that existing road space could be re-allocated for other forms of sustainable transport and other uses such as green infrastructure. Development sites located away from sustainable travel routes and Public Transport will lock in long term negative associated impacts of increased vehicle usage (electric or fuel vehicles), such as increased congestion, poor productivity, poor air quality and poor health and wellbeing outcomes in South Gloucestershire and the wider region.<br><br>We would welcome consideration of inclusion within Parking Standards of the need to incorporate sustainable drainage systems and the use of permeable surfacing. Such Policy guidance would actively avoid soil sealing and promote rainwater infiltration which may contribute to a localised reduction in Flood Risk, particularly from surface water. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Helen Johnstone - Stroud District Council |
| **Comment ID** | 14317537/259 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | 1. Support the retention of a Policy promoting the provision of vehicle parking, as part of a wider Policy promoting transport choice and accessibility, for residential and non-residential development in accordance with adopted standards set out in an Appendix to the Local Plan unless it can be demonstrated that the proposed development would not have an adverse impact on the local road network.<br>2. Supporting text to the Policy could then be used to clarify particular local circumstances, for example in relation to different parts of the urban area, where flexibility in the provision of parking and open space (public and private) standards would be considered appropriate. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ann O'Driscoll - North Bristol SusCom Ltd |
| **Comment ID** | 5846881/276 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | It is very important that any on street electric vehicle charging points use on-street for any charging infrastructure and do not involve taking away pavement space from pedestrians or cyclists.<br><br>I enclose two photos from the web - one which shows poor EV on street infrastructure (invades pavement space) and one which shows good infrastructure (doesn't take space away from pavements).<br><br>**Car Parking Standards -**<br><br>North Bristol SusCom took part in the DfT "Local Sustainable Transport Fund (LSTF) Case Study Evaluation Strategic Employment Sites and Business Parks." The Report was shared with participants in May 2017 but I am not sure if it has been formally published yet by the DfT so I am not uploading it here. The Study was carried out between late 2013 and early 2016 by a research team led by Hertfordshire County Council and comprising: the University of Hertfordshire, the University of the West of England, the West of England Local Authorities and Atkins. The aims of the evaluation were: to establish the impact of sustainable transport measures on commute mode use at selected strategic employment sites and Business Parks; to asses the impacts of these measures on the business performance of employers located at the sites; and to review the effectiveness of the LSTF delivery process. The Bristol North Fringe area was one of four employment sites and Business Parks chosen for evaluation and was made up of North Bristol SusCom members.<br><br>"In the Bristol North Fringe, car alone mode share for commuting fell by 2.3 percentage points (and total car mode share by 4.8 percentage points), and at the Western Trading Estates in Slough it fell by 3.4 percentage points (and total car mode share by 5.1 percentage points). In the Bristol North Fringe, mode share increases were observed for bus use, cycling and walking.<br><br>"The fall in car mode share in the Bristol North Fringe is striking when compared with background trends in the South West region, which saw an increase of 1.4% in total car mode share between 2013 and 2015. Various sources of evidence have been used to explain the modal shift in Bristol North Fringe. **These show that reduction in parking availability was the primary factor for reduced car alone commuting in Bristol North Fringe** with LSTF measures facilitating individuals using alternatives to car commuting in this context." |
| **Attached documents** | |

| | |
|---|---|
| | Having Car Parking Standards in place can help reduce car use but only if people are enabled to use sustainable transport - sticks are only effective if there are carrots available. |
| **Attached documents** | Charging Infrastrucutre - Bad Example.pdf (15 KB)<br>Charging Infrastrucutre - Good Example.pdf (238 KB) |

| | |
|---|---|
| **Respondent Name** | Sarah Blackmore |
| **Comment ID** | 16193889/312 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | As the growth of electric cars continues it is useful to consider the needs of these vehicles. I don't think it is necessary for all new homes to have an electric car charging point as that should be the homeowners choice to install this. However, perhaps consideration should be given at places of work when the workforce is over a certain size. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Hicks - Falfield Action Group |
| **Comment ID** | 16618369/330 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | The removal of car parking standards for all non-C3 use proves a barrier to potential customers for retail businesses.<br><br>The location of any commercial property needs to be considered, as lack of car parking for employees where there is no joined-up and regular Public Transport service within all hours of operation, could result in difficulties recruiting employees, particularly in rural locations. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Claire Young |
| **Comment ID** | 916289/346 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | I would strongly support Policies to make sure there is enough provision of electric car charging points. It is important to make sure that they are of an appropriate type for the location. For example, it makes no sense to provide expensive, ultra-fast charging points in destinations where people expect to stay for long periods, such as The Mall or a cinema. People will not want to leave the destination after half an hour to remove their car from charge and then go back in and so you do not get the throughput of vehicles expected. It would be better to provide a greater number of slightly slower charging points so more cars can be charged simultaneously. There also needs to be a solution to the myriad of charging schemes, some of which have a "standing charge." |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David White |
| **Comment ID** | 5522945/363 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | Home and work place charging points sensible but there is great need for public area charging points in car parks and streets. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Jill White |
| **Comment ID** | 10710785/385 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | I have an electric car and use a charging point at home. More are needed in public places. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Simmons - Westerleigh Parish Council |
| **Comment ID** | 17221409/411 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | **12I. Parking Standards including Electric Vehicle Charging Points:**<br><br>**Do you have any views on our intended approach to Parking Standards and Electric Vehicle Charging Points?**<br><br>**WPC agree that the investigation of the provision of Electric Vehicle Charging Points is needed.** |

| | |
|---|---|
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alveston, Rudgeway, and Earthcott Parish Council |
| **Comment ID** | 19784545/443 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | **Yes communal charging points required for domestic houses. Planning to take into account to minimise on street parking.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alan Jones - Hanham District Green Belt Conservation Society |
| **Comment ID** | 17236353/520 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | We cannot envisage many situations where this would not be a problem!!<br><br>? Office/factory workers parking in residential streets?<br><br>Presume from this Policy that if a building supports a workforce with a number of electric vehicles, that there would be standards imposed!! |
| **Attached documents** | Hanham District Green Belt Conservation Society (Alan Jones).pdf (20.3 MB) |

| | |
|---|---|
| **Respondent Name** | Roy Crew |
| **Comment ID** | 3973121/542 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | My Responses to the specific Local Plan Questions:<br><br>Question 12:<br><br>Residential parking is already a big problem. There was a delay getting an Emergency Ambulance to  last October. This was due to cars parked both sides of a residential Street. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Daphne Dunning - Cromhall Parish Council |
| **Comment ID** | 16475073/609 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | 12.<br><br>How are all the residents of North S. Glos supposed to commute if there are NO fit for purpose Public Transport links and you remove parking opportunities for non-residential use? Then probably add in a City congestion/emission charge at some point.<br><br>This proposal is forcing people to live in an area with no practical infrastructure and then penalising them for doing so. This coupled with your ambitions to reduce pollution and the number of car journeys made seems so wildly ill-conceived that it is laughable – we would expect car journeys to increase 10 fold in the local area to Cromhall and air quality to reduce to below acceptable levels, especially at J14 and the surrounding area where traffic will be forced to queue on the hard shoulder and country lanes.<br><br>How do you propose to monitor if car parking practices on a local level need amendment when residents will be travelling far and wide in search of employment? These will be a minor statistic in another zone and the reason for the parking need may not be evident to specifically benefit someone who has just commuted 20 miles because they have no other practical choice. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Zoe Hancock - Bristol Avon Catchment Partnership |
| **Comment ID** | 19832225/687 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |

| | |
|---|---|
| **Comment** | We would welcome consideration of inclusion within Parking Standards of the need to incorporate Sustainable Drainage Systems and the use of permeable surfacing. Such Policy Guidance would actively avoid soil sealing and promote rainwater infiltration which may contribute to a localised reduction in Flood Risk, particularly from surface water. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Heather Elgar - West of England Nature Partnership |
| **Comment ID** | 19839553/799 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | Please find below Comments from the West of England Nature Partnership (WENP) in response to the South Gloucestershire Local Plan Consultation.<br><br>For transparency, please know that Dominic Mellon (Consultant in Public Health for South Gloucestershire Council) sits on the WENP Board and thus note a declared conflict of interests. This Response reflects the aims and objectives of the Partnership and does not reflect views of individual Board members.<br><br>Question 12: Parking Standards Including Electric Vehicle Charging Point:<br><br>No Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Cate Davidson - Sodbury Town Council |
| **Comment ID** | 4877793/1019 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | Dear Planning Team,<br><br>Sodbury Town Council responds as follows to the Local Plan (non strategic) Consultation:<br><br>Q. 12 No Comment.<br><br>Please note the Comments as appropriate. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan E. Green - Home Builders Federation (HBF) |
| **Comment ID** | 10761601/1140 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | The Council propose to retain Policy PSP16 and investigate the proposed introduction of electric vehicle charging points. It may be premature for the Council to introduce a specific Policy for electric vehicle charging points in residential developments. Before pursuing such a Policy requirement the Council should engage with the main energy suppliers in order to determine network capacity to accommodate any adverse impacts if a proportion of dwellings are to have a recharge facility. If recharging demand became excessive there may be constraints to increasing the electric loading in an area because of the limited size and capacity of existing cables and new substation infrastructure may be necessary. The cost of such infrastructure may adversely impact on housing delivery. If electric vehicles are to be encouraged by the Government then a national standardised approach implemented through the Building Regulations would be more appropriate. The Council should be wary of developing its own Policy. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Emma Powell - Redrow Homes Limited |
| **Comment ID** | 19737921/1159 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | Part 3 - Policy Discussion Points:<br><br>Section 3 of the Local Plan Consultation sets out the titles of proposed Strategic Polices that will be included in the next version of the Local Plan. As such we do not have any Comments on the titles, but reserve our position to Comment on the detailed wording at the next Consultation. All Policies will need to be prepared in the context of the emerging NPPF, a final version is expected to published in the next few Months. The Strategic Policies will also need to reflect any changes to the West of England JSP as it progresses through the Examination towards adoption anticipated later in 2019. |

| | |
|---|---|
| | **Question 12:**<br><br>**I Parking Standards including Electric Vehicle Charging Points**<br><br>**Do you have any views on our intended approach to Parking Standards and Electric Vehicle Charging Points?**<br><br>It is noted that the Council intend to retain Policy PSP6 Parking Standards and review its scope. We reserve the opportunity to Comment on any wording in future, but would raise the issue that the cost of such infrastructure may adversely impact on housing delivery. If electric vehicles are to be encouraged by the Government then a national standardised approach implemented through the Building Regulations would be more appropriate. The Council should be wary of developing its own Policy. |
| **Attached documents** | Redrow Homes Limited (Emma Powell) - Pegasus Group (Mrs. Sarah Hamilton-Foyn).pdf (34.1 MB) |

| | |
|---|---|
| **Respondent Name** | Bovis Homes Limited |
| **Comment ID** | 20044801/1205 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | Please refer to enclosed letter. |
| **Attached documents** | Bovis Homes Limited - Rapleys LLP (Mr. Tony Clements).pdf (259 KB) |

| | |
|---|---|
| **Respondent Name** | Pat Hinton |
| **Comment ID** | 19780353/1302 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | South Glos has experienced a massive population increase in the past ten years, and this continues. Again, unfortunately, this has not been supported sufficiently by physical and social infrastructure. Levels of car ownership are also high resulting in problems with traffic and parking. Housing development should take account of the number of cars per family these days and allow sufficient car parking space in and around new housing developments.<br><br>The above are just a few thoughts from resident which I hope can be considered. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Bloor Homes South West |
| **Comment ID** | 20096097/1309 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | We support the Council's intention at the Second Paragraph of Page 86 of the Consultation Document where it indicates an intention to provide a shared Evidence Base on local parking need with the other West of England Authorities. It is our view that any prescriptive standards that will be included within the Emerging Local Plan need to be based on a robustly compiled and publically available Evidence Base that clearly justifies the requested level of provision. Furthermore a reasonable level of flexibility should be built into the requirement where it is acknowledged that not all residential developments across the District should reasonably be expected to deliver the same ratio of parking and that an element of pragmatism and judgment is appropriate in considering appropriate parking provision on a site by site basis.<br><br>With regards to provision of charging points for electric vehicles it is our view that the Council need to provide an indication of evidenced need for this. Although we support the transition to more sustainable transport modes, if the Council intend to make provision of electric charging points a mandatory requirement of new developments there needs to be evidence of actual need for this facility, based on actual data from South Gloucestershire. Although electric cars are becoming increasingly common they still make up a very small percentage of the licensed vehicles on the road in the UK. The latest statistics published by the Department of Transport on Vehicle Licencing (12 April 2018)state that only 1.2% of new vehicle registrations in 2017 were for ultra-low emission vehicles, of these only 35% are pure electric, with the remainder being hybrid vehicles. Admittedly this market is growing and the Government has an aspiration to cease the sale of new Fossil Fuel only vehicles by 2040. Nevertheless the total current amount of households with pure electric vehicles, who would therefore benefit from a charging point at their home makes up a very small fraction (around 0.1%) of licensed cars in the UK.<br><br>Should the Council seek to deliver electric charging points on all new developments we request that some evidence is provided that this is necessary, if so what level of provision is appropriate, and further evidence provided to justify that imposing this cost on the developer is the most appropriate course of action i.e. that the level of demand and benefits of bespoke residential charging points is sufficient to justify this facility being built into the development rather than being retrospectively installed if and when desired by future occupants. Any Policy seeking these charging points should also include sufficient flexibility and reasonable parameters to avoid costly overprovision of unnecessary charging points that are installed and remain unused. Without this further evidence on the need for these facilities, we object to the requirement for provision of electric charging points. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Fear Group |
| **Comment ID** | 19927745/1429 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |

| | |
|---|---|
| **Comment** | We support measures to facilitate a shift from Fossil Fuel based transport to use of vehicles that use low or zero emissions fuels. However, we urge a Policy approach that is flexible and underpinned by good evidence because this is an area of technology subject to significant uncertainty and potential for change. It will be important to ensure that requirements do not result in infrastructure that is under-used or becomes superseded by other technologies, such as, for example, Hydrogen Fuel. Electric cars are gradually increasing in number, but as they do so issues are raised over requirements for additional electricity energy generation. Greater battery range will increase use of electric vehicles but this may be constrained by limitations in the potential for charging points, for example when visiting friends and relatives in older residential areas within cities where the scope for visitor charging is limited.<br><br>The principal of electric charging points is therefore supported but the detail of the Policy will be important to encourage and enable solutions that do not relay on a single technology and that provision is future-proofed as far as possible. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Daniel Kelly - South Gloucestershire Liberal Democrat Council Group |
| **Comment ID** | 10311137/1445 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | We would strongly support Policies to ensure that there is adequate provision of electric charging points in order to ensure that new developments are fit for the future. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Laurence Parsons |
| **Comment ID** | 18822945/1494 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | *12. Parking Standards including Electric Vehicle Charging Points:*<br><br>Do you have any views on our intended approach to Parking Standards and Electric Vehicle Charging Points?<br><br>I welcome the inclusion of a Policy on the provision of Electric Vehicle Charging Points. The motor industry is telling us that more and more electric vehicles are being manufactured and bought, and it is essential that the Local Plan includes more than sufficient provision for the charging of these vehicles. Previous experience tells us that we are likely to underestimate take-up of this technology, so it would seem sensible to ensure that we do not fall into the same trap. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hannah Saunders - Dodington Parish Council |
| **Comment ID** | 19931969/1618 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | **COMMENTS:**<br><br>Members feel that current Parking Standards for flats are inadequate and should be addressed – and as mentioned in the previous Question should be taken into consideration when granting subdivisions, HMOs, etc.<br><br>As electric cars are the future, then charging points are essential. However, their location must be thought about carefully – as it will have a significant effect on street layout, etc. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | E. H. Schubert Will Trust |
| **Comment ID** | 12403425/1684 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | The localised “targeted Parking Standards in specific areas” is not considered sensible – it would not be sufficiently flexible to respond to individuals’ or families’ needs. In rural locations it should be recognised that reliance on private transport will be greater though where there are less congested roads, travel times could be significantly less than in major urban areas. It would be unreasonable for rural areas to be identified for targeted reductions in parking space provision. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | G. E. Forward |
| **Comment ID** | 20176577/1720 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |

| | |
|---|---|
| **Comment** | No Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | JFG Gunnery |
| **Comment ID** | 19741793/1984 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | The localised "targeted parking standards in specific areas" is not considered sensible in the absence of further supporting evidence. Concerns arise as to whether it would be sufficiently flexible to respond to individuals' or families' needs. In rural locations it should be recognised that reliance on private transport is greater though where there are fewer congested roads and travel times could be significantly less than in major urban areas. It would be unreasonable for rural areas to be identified for localised targeted reductions in parking space provision. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sebastian Loyn - YTL Developments (UK) Limited |
| **Comment ID** | 19779841/2081 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | I: Parking Standards Including Electric Vehicle Charging Points:<br><br>YTL welcome SGC exploring the need for vehicle charging points and the role this could play in encouraging the use of electric vehicles on the Airfield, and the benefit this would have on the local environment in regards to densification. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alex Atkinson - Edward Ware Homes (Land East of Coalpit Heath) |
| **Comment ID** | 20247169/2110 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Edward Ware Homes (Mr. Alex Atkinson) - Pegasus Group (Mr. Daniel Weaver).pdf (57.6 MB) |

| | |
|---|---|
| **Respondent Name** | Paul Davis - Persimmon Homes Severn Valley |
| **Comment ID** | 3553569/2148 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | Question 12 – Electric Vehicle Charging Points:<br><br>8.27 We consider the issue of Electric Vehicle Charging Points should be addressed through the Building Regulations, to provide consistent standards at a national level. In any event we do not consider it is necessary to require provision of Electric Vehicle Charging Points where homes have a garage or driveway. However if the Council considers a Policy in public places, we note the recently adopted North East Lincolnshire Local Plan which only requires Electric Vehicle Charging Points for commercial developments with over 100 parking spaces. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Baylis Estates Ltd |
| **Comment ID** | 19740609/2159 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | Part 3 - Policy Discussion Points<br><br>I. Parking Standards Including Electric Vehicle Charging Point<br><br>We support the Council's approach to remove Parking Standards for non-C3 uses as we agree that these should be considered on a case-by-case basis. Cribbs Causeway is a prime example of a location where shared car parking supports the commercial uses whilst allowing for effective use of the land for development.<br><br>Baylis Estates supports the Council's proposal to include Standards for Electric Vehicle Charging Points. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | CEG and The Charfield Landowners Consortium |
| **Comment ID** | 16664993/2221 |

| | |
|---|---|
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | **I: Parking Standards including Electric Vehicle Charging Points**:<br><br>Our Client is supportive in principle of including Policy measures to encourage and support the provision of Electric Vehicle Charging Points within the development. Any minimum Standards which are to be applied should not, however, be a blanket requirement, and should be sensitive to the requirements of different locations and uses. For example, different approaches will be required between residential and commercial uses, and developments with communal or on-street parking will require different solutions to individual dwellings.<br><br>Standards should also be based on clear evidence of current and anticipated uptake of Electric Vehicles, noting that higher tariffed rates may lead to an oversupply of points in the short term. A more prudent approach would place more emphasis upon adaptability and retrofitting to enable developments to respond to increased demand or evolving technologies and products, as may manifest in the future. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Fortannia Ltd |
| **Comment ID** | 19741217/2334 |
| **Document Part Name** | Question 12 - Parking Standards including Electric Vehicle Charging Points |
| **Comment** | **I. Parking Standards including Electric Vehicle Charging Points. Do you have any views on our intended approach to Parking Standards and Electric Vehicle Charging Points?**<br><br>The localised “targeted Parking Standards in specific areas” is not considered sensible in the absence of further supporting evidence. Concerns arise as to whether it would be sufficiently flexible to respond to individuals’ or families’ needs. In rural locations it should be recognised that reliance on private transport is greater though where there are less congested roads, travel times could be significantly less than in major urban areas. It would be unreasonable for rural areas to be identified for localised targeted reductions in parking space provision. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Martin Swinburne |
| **Comment ID** | 10327617/54 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | I support the adoption of a Policy to ensure all new houses are equiped with high speed Broadband. The benefits of high speed Broadband to the country have been well documented elsewhere.<br><br>I think the North Somerset wording does not futureproof new-builds for the high speed Broadband that is coming. It would be possible to meet the North Somerset requirements using existing VDSL over twisted copper pair. And 24Mb/s is pedestrian compared to the standard 1Gb/s enjoyed by Singapore residents. It would be much better to specify that new houses should have fibre from a kerbside cabinet to a termination point inside the home; don't specify the technology or data speed. Modem technology changes and data speeds increase. But if you have dark fibre running into the home those upgrades are easily done by changing the modem and MUX.<br><br>One day we will all have fibre to the home - it's the only way to get gigabit data speeds. In the meantime specifying fibre to the home on new-builds will ensure the home is futureproofed. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Margaret Pinder - Sustainable Thornbury |
| **Comment ID** | 19372321/66 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | We agree that there should be a requirement for Broadband provision but do not agree that costs should be part of viability assessment. This is now required infrastructure for future sustainable living, especially homeworking in rural areas. Developers should not be given the opportunity to renege on this requirement. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Lyn Haigh - Rangeworthy Parish Council |
| **Comment ID** | 2301601/189 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | I support the move to make access to Superfast Broadband a requirement since the ability to work from home appears to be the only solution likely to mitigate the increasing road congestion in the foreseeable future. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Carolyn Baker |
| **Comment ID** | 17252193/213 |

| | |
|---|---|
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | The new Policy requirement for Broadband is appropriate and indeed essential for South Gloucestershire. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Helen Johnstone - Stroud District Council |
| **Comment ID** | 14317537/260 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | 1. Support the introduction of a Policy requirement relating to the provision of Superfast Broadband, to promote accessibility to Superfast Broadband connections, particularly within rural areas, and the sustainability of local communities. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Lesley Brown |
| **Comment ID** | 16384673/295 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | It would be good to require appropriate Broadband provision. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sarah Blackmore |
| **Comment ID** | 16193889/313 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | Due to the growing demand, usage & reliance on Broadband I believe a Policy similar to North Somerset would be appropriate. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Hicks - Falfield Action Group |
| **Comment ID** | 16618369/331 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | Although a number of rural villages are deemed to have Superfast Broadband, the reality is often not as it appears, with unreliable service and low Internet speeds - often as the green connection units are a considerable distance from properties (e.g. over a mile). Hence the Policy should be to provide additional capacity and never rely on existing capacity. It should also be extended to improve connectivity for those in the immediate vicinity of the development, so the community benefits. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Claire Young |
| **Comment ID** | 916289/347 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | Broadband has become an essential utility and should be provided to all new homes and business premises, not just on those developments above a threshold. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tristan Clark |
| **Comment ID** | 19194177/366 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | A new Policy requirement for Superfast Broadband is essential although its wording should be tailored to the needs of both our urban and rural communities. Superfast Broadband brings such benefits to residents and businesses that its provision is of fundamental importance to the future development of South Gloucestershire. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Simmons - Westerleigh Parish Council |
| **Comment ID** | 17221409/412 |
| **Document Part Name** | Question 13 - Broadband Provision |

| | |
|---|---|
| **Comment** | **13J. Broadband Provision:**<br><br>**Do you have any views on the introduction of this new Policy requirement on Superfast Broadband and whether the North Somerset Policy would be appropriate for South Gloucestershire?**<br><br>**WPC consider that Broadband is a fundamental utility and the North Somerset approach would be a minimum considering the SGLP runs to 2036. The needs of all areas urban & rural need to be covered.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alveston, Rudgeway, and Earthcott Parish Council |
| **Comment ID** | 19784545/444 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | **Has to be cost effective. Imagine ok for the large sites but possibly less return for smaller communities.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Donna Ford - Iron Acton Parish Council |
| **Comment ID** | 1060385/468 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | **Broadband Provision:**<br><br>Iron Acton Parish Council supports the inclusion of a specific requirement for the provision of Superfast Broadband infrastructure within the new Local Plan. The Parish Council shares the view that Superfast Broadband is an increasingly essential utility for modern living and that provision should be made for this in all new homes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christine Hunter |
| **Comment ID** | 19809025/493 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | **Broadband Provision:**<br><br>I agree with the inclusion of a specific requirement for the provision of Superfast Broadband infrastructure within the new Local Plan. Superfast Broadband is an increasingly essential utility for modern living and provision should be made for this in all new homes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alan Jones - Hanham District Green Belt Conservation Society |
| **Comment ID** | 17236353/518 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | We have no idea why reference to North Somerset is relevant. |
| **Attached documents** | Hanham District Green Belt Conservation Society (Alan Jones).pdf (20.3 MB) |

| | |
|---|---|
| **Respondent Name** | Roy Crew |
| **Comment ID** | 3973121/544 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | My Responses to the specific Local Plan Questions:<br><br>Question 13:<br><br>No Comments |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Paul Chapman - Iron Acton Parish Council |
| **Comment ID** | 19809537/559 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | **Broadband Provision:**<br><br>I agree with the inclusion of a specific requirement for the provision of Superfast Broadband infrastructure within the new Local Plan. Superfast Broadband is an increasingly essential utility for modern living and provision should be made for this in all new homes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David Hatherell |
| **Comment ID** | 19830849/574 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | **Broadband Provision:**<br><br>I agree with the inclusion of a specific requirement for the provision of Superfast Broadband infrastructure within the new Local Plan. Superfast Broadband is an increasingly essential utility for modern living and provision should be made for this in all new homes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | John O'Donnell |
| **Comment ID** | 18604385/585 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | **Broadband Provision:**<br><br>I agree with the inclusion of a specific requirement for the provision of Superfast Broadband infrastructure within the new Local Plan. Superfast Broadband is an increasingly essential utility for modern living and provision should be made for this in all new homes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Joseph Hatherell |
| **Comment ID** | 19831681/596 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | **Broadband Provision:**<br><br>I agree with the inclusion of a specific requirement for the provision of Superfast Broadband infrastructure within the new Local Plan. Superfast Broadband is an increasingly essential utility for modern living and provision should be made for this in all new homes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Karen Longden |
| **Comment ID** | 19831809/615 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | **Broadband Provision:**<br><br>I agree with the inclusion of a specific requirement for the provision of Superfast Broadband infrastructure within the new Local Plan. Superfast Broadband is an increasingly essential utility for modern living and provision should be made for this in all new homes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Jane Driver |
| **Comment ID** | 5134785/629 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | **Broadband Provision:**<br><br>I agree with the inclusion of a specific requirement for the provision of Superfast Broadband infrastructure within the new Local Plan. Superfast Broadband is an increasingly essential utility for modern living and provision should be made for this in all new homes. |

| | |
|---|---|
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Diana Porter-Smith |
| **Comment ID** | 10874433/640 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | **Broadband Provision:**<br><br>I agree with the inclusion of a specific requirement for the provision of Superfast Broadband infrastructure within the new Local Plan. Superfast Broadband is an increasingly essential utility for modern living and provision should be made for this in all new homes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Michael Keenan |
| **Comment ID** | 2796353/652 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | **Broadband Provision:**<br><br>I agree with the inclusion of a specific requirement for the provision of Superfast Broadband infrastructure within the new Local Plan. Superfast Broadband is an increasingly essential utility for modern living and provision should be made for this in all new homes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Richard Hunter |
| **Comment ID** | 12513441/667 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | **Broadband Provision:**<br><br>I agree with the inclusion of a specific requirement for the provision of Superfast Broadband infrastructure within the new Local Plan. Superfast Broadband is an increasingly essential utility for modern living and provision should be made for this in all new homes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Zoe Hancock - Bristol Avon Catchment Partnership |
| **Comment ID** | 19832225/688 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | No additional Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Rosemary White |
| **Comment ID** | 10707009/701 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | Broadband Provision:<br><br>I agree with the inclusion of a specific requirement for the provision of Superfast Broadband infrastructure within the new Local Plan. Superfast Broadband is an increasingly essential utility for modern living and provision should be made for this in all new homes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Purchase |
| **Comment ID** | 2804385/712 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | **Broadband Provision:** |

| | |
|---|---|
| | I agree with the inclusion of a specific requirement for the provision of Superfast Broadband infrastructure within the new Local Plan. Superfast Broadband is an increasingly essential utility for modern living and provision should be made for this in all new homes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | James Carpenter - Falfield Parish Council |
| **Comment ID** | 16617825/744 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | Falfield Parish Council would like to see the wording of this Policy expanded to mention provision for existing residential areas adjacent to the new development areas.<br><br>We feel that opportunities to improve Broadband provision for existing residents living near to new development sites should also be included in the wording, and that consideration is made by developers to improving access for providers to existing nearby properties and provision of ducts across land to serve nearby properties etc.<br><br>In addition to Broadband, this wording should be extended to consideration of providing other utility services e.g. gas, mains sewers etc to existing residents living near to new development sites in rural areas. A new Local Plan Policy may be required to incorporate this. |
| **Attached documents** | Falfield Parish Council (Mr. James Carpenter).pdf (1.9 MB) |

| | |
|---|---|
| **Respondent Name** | Suzanna Keenan |
| **Comment ID** | 17805057/755 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | **Broadband Provision:**<br><br>I agree with the inclusion of a specific requirement for the provision of Superfast Broadband infrastructure within the new Local Plan. Superfast Broadband is an increasingly essential utility for modern living and provision should be made for this in all new homes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Simon Whittard |
| **Comment ID** | 12489153/767 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | **Broadband Provision:**<br><br>I agree with the inclusion of a specific requirement for the provision of Superfast Broadband infrastructure within the new Local Plan. Superfast Broadband is an increasingly essential utility for modern living and provision should be made for this in all new homes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Heather Elgar - West of England Nature Partnership |
| **Comment ID** | 19839553/800 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | Please find below Comments from the West of England Nature Partnership (WENP) in response to the South Gloucestershire Local Plan Consultation.<br><br>For transparency, please know that Dominic Mellon (Consultant in Public Health for South Gloucestershire Council) sits on the WENP Board and thus note a declared conflict of interests. This Response reflects the aims and objectives of the Partnership and does not reflect views of individual Board members.<br><br>Question 13: Broadband Provision:<br><br>No Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Robert and Diana Pardoe |
| **Comment ID** | 10784545/814 |

| | |
|---|---|
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | **Broadband Provision:**<br><br>I agree with the inclusion of a specific requirement for the provision of Superfast Broadband infrastructure within the new Local Plan. Superfast Broadband is an increasingly essential utility for modern living and provision should be made for this in all new homes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Brian Hackland |
| **Comment ID** | 8354337/831 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | **Broadband Provision:**<br><br>It has been a long, expensive struggle to extend Broadband to the UK's rural communities. I agree, therefore, with the proposal for inclusion of a specific requirement for the provision of Superfast Broadband infrastructure within the new Local Plan. Superfast Broadband is an increasingly essential utility for modern living and provision should be made for this in all new homes, whether in strategic or non-strategic developments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anna Webster |
| **Comment ID** | 19843617/842 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | **Broadband Provision:**<br><br>I agree with the inclusion of a specific requirement for the provision of Superfast Broadband infrastructure within the new Local Plan. Superfast Broadband is an increasingly essential utility for modern living and provision should be made for this in all new homes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Victoria & John Vlietstra |
| **Comment ID** | 19843937/853 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | **Broadband Provision:**<br><br>We agree with the inclusion of a specific requirement for the provision of Superfast Broadband infrastructure within the new Local Plan. Superfast Broadband is an increasingly essential utility for modern living and provision should be made for this in all new homes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christina Fussell |
| **Comment ID** | 19843969/864 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | **Broadband Provision:**<br><br>I agree with the inclusion of a specific requirement for the provision of Superfast Broadband infrastructure within the new Local Plan. Superfast Broadband is an increasingly essential utility for modern living and provision should be made for this in all new homes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Paul Fussell |
| **Comment ID** | 19844001/875 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | **Broadband Provision:**<br><br>I agree with the inclusion of a specific requirement for the provision of Superfast Broadband infrastructure within the new Local Plan. Superfast Broadband is an increasingly essential utility for modern living and provision should be made for this in all new homes. |

| | |
|---|---|
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Oliver Fussell |
| **Comment ID** | 10784449/887 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | **Broadband Provision:**<br><br>I agree with the inclusion of a specific requirement for the provision of Superfast Broadband infrastructure within the new Local Plan. Superfast Broadband is an increasingly essential utility for modern living and provision should be made for this in all new homes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tom Barnes |
| **Comment ID** | 19844673/898 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | **Broadband Provision:**<br><br>I agree with the inclusion of a specific requirement for the provision of Superfast Broadband infrastructure within the new Local Plan. Superfast Broadband is an increasingly essential utility for modern living and provision should be made for this in all new homes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Peter Barker - Latteridge Road Community Group |
| **Comment ID** | 6622945/943 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | **Broadband Provision:**<br><br>I agree with the inclusion of a specific requirement for the provision of Superfast Broadband infrastructure within the new Local Plan. Superfast Broadband is an increasingly essential utility for modern living and provision should be made for this in all new homes.<br><br>This should apply not just to new homes but existing ones too - some of which have only a few KBs/sec (equivalent to dial-up) speeds - and no mobile phone signal! |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kate Edmonds |
| **Comment ID** | 19883393/954 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | **Broadband Provision:**<br><br>I agree with the inclusion of a specific requirement for the provision of Superfast Broadband infrastructure within the new Local Plan. Superfast Broadband is an increasingly essential utility for modern living and provision should be made for this in all new homes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David and Tracey Jones |
| **Comment ID** | 19883585/974 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | **Broadband Provision:**<br><br>I agree with the inclusion of a specific requirement for the provision of Superfast Broadband infrastructure within the new Local Plan. Superfast Broadband is an increasingly essential utility for modern living and provision should be made for this in all new homes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Cate Davidson - Sodbury Town Council |

| | |
|---|---|
| **Comment ID** | 4877793/1020 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | Dear Planning Team,<br><br>Sodbury Town Council responds as follows to the Local Plan (non strategic) Consultation:<br><br>Q. 13 No Comment.<br><br>Please note the Comments as appropriate. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Barwood Development Securities Ltd and The Thornbury Landowner Consortium |
| **Comment ID** | 19884545/1100 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | Please find attached Representation. |
| **Attached documents** | Barwood Development Securities Ltd and The Thornbury Landowner Consortium - Savills (Miss. Felicity Tozer).pdf (650 KB) |

| | |
|---|---|
| **Respondent Name** | Susan E. Green - Home Builders Federation (HBF) |
| **Comment ID** | 10761601/1141 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | The HBF object to the Council's proposal to introduce a new Policy requirement that development will provide access to at least Superfast Broadband (24Mbps+). The Council should not stipulate standards on digital connectivity. The WMS of 25th March 2015 announced that Councils preparing Local Plans "*should not set any additional standards or requirements relating to the construction, internal layout or performance of new dwellings."* It is not appropriate for the Council to stipulate standards that are higher than current Part R1 of the Building Regulations. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Emma Powell - Redrow Homes Limited |
| **Comment ID** | 19737921/1160 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | Part 3 - Policy Discussion Points:<br><br>Section 3 of the Local Plan Consultation sets out the titles of proposed Strategic Polices that will be included in the next version of the Local Plan. As such we do not have any Comments on the titles, but reserve our position to Comment on the detailed wording at the next Consultation. All Policies will need to be prepared in the context of the emerging NPPF, a final version is expected to published in the next few Months. The Strategic Policies will also need to reflect any changes to the West of England JSP as it progresses through the Examination towards adoption anticipated later in 2019.<br><br>**Question 13:**<br><br>**J. Broadband Provision**<br><br>**Do you have any views on the introduction of this new Policy requirement on Superfast Broadband and whether the North Somerset Policy would be appropriate for South Gloucestershire?**<br><br>The WMS of 25th March 2015 announced that Councils preparing Local Plans "*should not set any additional standards or requirements relating to the construction, internal layout or performance of new dwellings.*" It is not appropriate for the Council to stipulate standards that are higher than current Part R1 of the Building Regulations. |
| **Attached documents** | Redrow Homes Limited (Emma Powell) - Pegasus Group (Mrs. Sarah Hamilton-Foyn).pdf (34.1 MB) |

| | |
|---|---|
| **Respondent Name** | Bovis Homes Limited |
| **Comment ID** | 20044801/1206 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | Please refer to enclosed letter. |
| **Attached documents** | Bovis Homes Limited - Rapleys LLP (Mr. Tony Clements).pdf (259 KB) |

| | |
|---|---|
| **Respondent Name** | Richard Bull - Environment Agency |
| **Comment ID** | 11527745/1257 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | J. Broadband Provision:<br><br>Works in, over, under or within 8 metres of a Main River are likely to require a Flood Risk Activity Permit:<br><br>https://www.gov.uk/guidance/flood-risk-activities-environmentalpermits |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Bloor Homes South West |
| **Comment ID** | 20096097/1310 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | On behalf of our Client, Bloor Homes, our views on this proposed Policy are that further detail needs to be provided to explain what level of detail developers will need to provide with relation to demonstrating how Superfast Broadband can be accommodated on sites. Additional detail is also required in relation to what point in the project this information needs to be provided and what level of detail would be needed for developments to be deemed 'Broadband ready.'<br><br>We request that, if the Council intend to produce a Policy requiring developments to demonstrate they are capable of accommodating Superfast Broadband, then additional background information, examples and an Evidence Base is needed setting out the requirements for this. Justification is sought primarily as to why the cost burden for this provision should lie with the developers of new homes providing future Broadband customers rather than the commercial Broadband operators who will ultimately benefit from those potential customers.<br><br>South Gloucestershire includes a mix of communities and potential development sites in a range of areas from very rural to those already part of the urban conurbation of Bristol. Consequently any Policy requiring Broadband infrastructure within the new Local Plan must include sufficient flexibility to allow discretion on a site by site basis by decision makers. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Adrian Edmonds |
| **Comment ID** | 19926305/1344 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | **Broadband Provision:**<br><br>I agree with the inclusion of a specific requirement for the provision of Superfast Broadband infrastructure within the new Local Plan. Superfast Broadband is an increasingly essential utility for modern living and provision should be made for this in all new homes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Daniel Kelly - South Gloucestershire Liberal Democrat Council Group |
| **Comment ID** | 10311137/1446 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | We do not believe that this Policy goes far enough. Broadband is no longer an extra luxury but an essential utility for all homes. We believe that the 10 dwellings threshold should be dropped and that all housing developments of whatever scale should be required to demonstrate how Superfast Broadband will be accommodated. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Rebecca Thompson - Wallace Land Investments |
| **Comment ID** | 19935809/1477 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | It is not appropriate for the Council to stipulate standards that are higher than current Part R1 of the Building Regulations. The Council should not stipulate standards on digital connectivity. The WMS of 25th March 2015 announced that Councils preparing Local Plans "*should not set any additional standards or requirements relating to the construction, internal layout or performance of new dwellings."* |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Laurence Parsons |
| **Comment ID** | 18822945/1495 |
| **Document Part Name** | Question 13 - Broadband Provision |

| | |
|---|---|
| **Comment** | *13. Broadband Provision:*<br><br>Do you have any views on the introduction of this new Policy requirement on Superfast Broadband and whether the North Somerset Policy would be appropriate for South Gloucestershire?<br><br>I welcome the inclusion of a Policy on Superfast Broadband provision. Charfield is sadly lacking in this area, due to its remote location. This technology is becoming more essential for everyday life, and if the Council wish to sell the 1,200 houses they intend building in Charfield, then this provision is non-negotiable. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hannah Saunders - Dodington Parish Council |
| **Comment ID** | 19931969/1619 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | **COMMENTS:**<br><br>Members feel that the North Somerset Policy would be appropriate – Broadband provision is essential and this would be a good way forward. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | E. H. Schubert Will Trust |
| **Comment ID** | 12403425/1685 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | The Consultation Document refers to North Somerset Council's approach to Policy but does not advise on its effectiveness, implementation and level of success – further information and evidence should be provided at the next stage of Consultation. As an aside, in the analysis of suitable settlement locations, we query whether the analysis of accessibility of locations to Superfast Broadband is accurate. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Frampton Cotterell Parish Council |
| **Comment ID** | 20175105/1699 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | Frampton Cotterell Parish Council believes that all places should have Superfast Broadband which in turn will help alleviate traffic issues. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | G. E. Forward |
| **Comment ID** | 20176577/1721 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | No Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hazel Jones - Hawkesbury Parish Council |
| **Comment ID** | 16665185/1737 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | All buildings should be built with access to Superfast Broadband; this should not be limited to developments of 10 or over. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Bloor Homes (South West) |
| **Comment ID** | 20211105/1953 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | Please find attached Representation. |
| **Attached documents** | Appendix 1 - Part 5.pdf (6.4 MB)<br>Local Plan 2018-36 - Coalpit Heath.pdf (205 KB)<br>Appendix 1 - Part 4.pdf (6.0 MB) |

| | |
|---|---|
| | Appendix 1 - Part 2.pdf (6.7 MB)<br>Appendix 1 - Part 1.pdf (11.3 MB)<br>Appendix 1 - Part 6.pdf (17.4 MB)<br>Appendix 2.pdf (453 KB)<br>Appendix 1 - Part 3.pdf (7.3 MB) |

| | |
|---|---|
| **Respondent Name** | JFG Gunnery |
| **Comment ID** | 19741793/1985 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | The Consultation Document refers to North Somerset Council's approach to Broadband Policy. However, no evidence is presented to illustrate its effectiveness, ease of implementation and overall level of success. Further information should be provided at the next stage of Consultation prepared by the Broadband providers.<br><br>As an aside, in the analysis of suitable settlement locations to accommodate development, we query whether the reporting of accessibility of locations to Superfast Broadband is up-to-date and accurate. If it is not then this will directly impact upon the robust assessment of settlements to receive new development.<br><br>It should also be noted that Superfast Broadband availability is being rolled out throughout the Plan Period. It is unhelpful to apply any current snapshot of availability to the development of key settlements. Evidence should also be provided to illustrate (so far as possible/can be anticipated) Superfast Broadband planned roll-out on a yearly basis.<br><br>**To conclude:**<br><br>We trust that these Comments are helpful. We look forward to engaging in subsequent stages of the Plan making process. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Douglas Homes |
| **Comment ID** | 20120033/2013 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | **Broadband Provision and Energy Efficiency:**<br><br>The introduction of a Broadband provision Policy is unnecessary and will add to the already complex level of detail which is required to be provided with Planning Applications. The requirement is already covered under Part R of the Building Regulations and do not need to be repeated at the Planning stage. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sue Hope |
| **Comment ID** | 411169/2033 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | **Broadband Infrastructure:**<br><br>Broadband is part of the infrastructure and is now seen as a necessity (see previous Comments regarding Online Response). All new properties should have access to Superfast Broadband, not just developments of over 10 houses. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alex Atkinson - Edward Ware Homes (Land East of Coalpit Heath) |
| **Comment ID** | 20247169/2111 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Edward Ware Homes (Mr. Alex Atkinson) - Pegasus Group (Mr. Daniel Weaver).pdf (57.6 MB) |

| | |
|---|---|
| **Respondent Name** | Paul Davis - Persimmon Homes Severn Valley |
| **Comment ID** | 3553569/2149 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | Question 13 – Broadband Provision:<br><br>8.28 PHSV consider it is inappropriate to include a Policy on standards relating to the provision of Superfast Broadband for the following reasons: |

| | |
|---|---|
| | 1. Paragraphs 42 and 43 of the NPPF relate to the provision of communication networks not individual site requirements.<br><br>2. In relation to provision on development sites, the Written Ministerial Statement of 25th March 2015 says Local Planning Authorities *'should not set any additional standards or requirements relating to the construction, internal layout or performance of new dwellings.'*<br><br>3. Equally, given that Superfast Broadband will be provided by other private companies, it is inappropriate to impose specific standards on individual sites rather than provide Policy guidance for improvement to Broadband infrastructure generally. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | CEG and The Charfield Landowners Consortium |
| **Comment ID** | 16664993/2222 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | **J: Broadband Provision:**<br><br>The Consultation Document notes that the Council are considering including a specific requirement for the provision of Superfast Broadband Infrastructure within new developments, highlighting an example Policy which requires developers to demonstrate how proposals will accommodate Superfast Broadband.<br><br>Our Client supports the incorporation of Superfast Broadband within development; however, it should be noted that beyond main urban areas, availability of Superfast Broadband is often poor and beyond developer's control to change this. Improvements to Broadband infrastructure are often predicated on meeting current or anticipated demand, and so we would discourage the Council from placing any requirements which would prevent development coming forward which would otherwise support the viability of Broadband infrastructure improvements. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Amanda Scott |
| **Comment ID** | 20374561/2295 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | **Broadband Provision:**<br><br>I agree with the inclusion of a specific requirement for the provision of Superfast Broadband infrastructure within the new Local Plan. Superfast Broadband is an increasingly essential utility for modern living and provision should be made for this in all new homes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Fortannia Ltd |
| **Comment ID** | 19741217/2335 |
| **Document Part Name** | Question 13 - Broadband Provision |
| **Comment** | **J. Broadband Provision. Do you have any views on the introduction of this new Policy requirement on Superfast Broadband and whether the North Somerset Policy would be appropriate for South Gloucestershire?**<br><br>The Consultation Document refers to North Somerset Council's approach to Broadband Policy. However, no evidence is presented to illustrate its effectiveness, ease of implementation and overall level of success. Further information should be provided at the next stage of Consultation prepared by the Broadband providers.<br><br>As an aside, in the analysis of suitable settlement locations to accommodate development, we query whether the analysis of accessibility of locations to Superfast Broadband is up-to-date and accurate. If it is not then this will directly impact upon the robust assessment of settlements to receive new development.<br><br>Please note that it is our understanding that Alveston benefits from Superfast Broadband – the Sustainable Access Profiles should be corrected as such.<br><br>**To conclude:**<br><br>We trust that these Comments are helpful. We look forward to receiving confirmation of receipt. Our Client would be happy to engage with the Local Authority to discuss further their Site Submission at Alveston. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kate Kelliher |
| **Comment ID** | 6031873/48 |
| **Document Part Name** | Question 14 - Decommisioning of the Oldbury Power Station |

| | |
|---|---|
| **Comment** | The freed up land at Oldbury Power Station should be used for new strategic development in South Glos, rather than in Coalpit Heath, Charfield etc. The area has not had a history of flooding and new housing would be a very appropriate use of the site. A Decommissioning Policy to promote this objective should be put in place. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Margaret Pinder - Sustainable Thornbury |
| **Comment ID** | 19372321/67 |
| **Document Part Name** | Question 14 - Decommisioning of the Oldbury Power Station |
| **Comment** | We strongly support the need for a Decommissioning olicy for Oldbury Power Station in order that Planners (and residents) can be assured that individual Planning Applications can be considered fully in the light of the overall agreed Policy. Decommissioning is a complex process with many facets to be considered each time a Planning Application is submitted. Given the number of years that Decommissioning will take and the potential turnover of both staff and Councillors responsible for Planning Decisions, it is essential that clear guidance is provided at the outset. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mayers |
| **Comment ID** | 16271713/100 |
| **Document Part Name** | Question 14 - Decommisioning of the Oldbury Power Station |
| **Comment** | Oldbury Power Station has not been in use for years, I believe many people lost their jobs a long time ago, so the loss of the Power Station shouldn't have much impact, apart form the fact that not many people want nuclear anyway and even less likely to work with it. The environment should be a priority when Decommissioning to ensure the land around the building and the water are kept safe and clear of hazardous material. If possible this can be an area to put new homes onto when the building is torn down saving countless wildlife and Green Belt and using Brownfield land much more efficiently. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anne Gale |
| **Comment ID** | 16344321/131 |
| **Document Part Name** | Question 14 - Decommisioning of the Oldbury Power Station |
| **Comment** | Leave Decommissioning to the EXPERTS. The last thing we need is the local Council messing about with nuclear waste. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Thompson |
| **Comment ID** | 17795873/169 |
| **Document Part Name** | Question 14 - Decommisioning of the Oldbury Power Station |
| **Comment** | No Policy should be developed in support of the long term storage of Radioactive Waste on site at Oldbury without a widely publicised separate local Consultation. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Gillian Sanders - Wessex Water |
| **Comment ID** | 19455361/238 |
| **Document Part Name** | Question 14 - Decommisioning of the Oldbury Power Station |
| **Comment** | Consideration should be given to avoid the creation of contaminated runoff or water entering the surface or foul sewer network. Should any impacts to these networks be under consideration, early engagement with the statutory sewerage undertaker is recommended. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Helen Johnstone - Stroud District Council |
| **Comment ID** | 14317537/261 |
| **Document Part Name** | Question 14 - Decommisioning of the Oldbury Power Station |
| **Comment** | 1. Support a Local Plan Policy for the Decommissioning of Oldbury Power Station to ensure that strategic level impacts and mitigation measures are adequately planned for.<br>2. Stroud District Council would welcome the opportunity to work closely with South Gloucestershire Council on development of this Policy area; in particular with regard to the provision of housing for construction workers, health and safety issues having regard to the location of Stroud District within the identified nuclear waste risk area, transport and Biodiversity impacts; to satisfactorily address these issues. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tristan Clark |
| **Comment ID** | 19194177/368 |
| **Document Part Name** | Question 14 - Decommisioning of the Oldbury Power Station |
| **Comment** | A Decommissioning Policy that is informed by industry specialists, environmental researchers/academics, etc is a sensible precaution if it protects the surrounding environs and helps avoid mismanagement of the complex Decommissioning project. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Simmons - Westerleigh Parish Council |
| **Comment ID** | 17221409/413 |
| **Document Part Name** | Question 14 - Decommisioning of the Oldbury Power Station |
| **Comment** | **14K. Decommissioning of the Oldbury Power Station:**<br><br>**WPC is unqualified to comment on this.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alveston, Rudgeway, and Earthcott Parish Council |
| **Comment ID** | 19784545/445 |
| **Document Part Name** | Question 14 - Decommisioning of the Oldbury Power Station |
| **Comment** | **Yes, radioactive stuff is nasty and the public can get emotional. A Policy is required even if it simply duplicates national Policy.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Philip Matthews - NuLeAF (The Nuclear Legacy Advisory Forum) |
| **Comment ID** | 19802273/483 |
| **Document Part Name** | Question 14 - Decommisioning of the Oldbury Power Station |
| **Comment** | 1. **Comments on Policies:**<br><br>We welcome the inclusion of clear Policies on the Decommissioning of the Oldbury Power Station and on the Storage of Radioactive and other Hazardous Waste. NuLeAF has worked with our Local Authority members over recent years to encourage the inclusion of clear Policies on these topics. Such Policies are of benefit to Local Government and communities, establishing as they do a framework for decision making and for engagement with the nuclear industry.<br><br>1. **Decommissioning of the Oldbury Power Station - Question 14:**<br><br>We agree that a Decommissioning Policy is required, for the reasons provided in the introductory text to Section 2 (above).<br><br>We believe that Policy K sets out the main issues and concerns that should be addressed in decommissioning the existing Power Station and enabling its next planned use. In particular, we welcome the commitment to a Planning Framework and phased masterplan. As the Document recognises, it is important that a strategic approach is taken rather than one based on a piecemeal response to individual Planning Applications.<br><br>The aspirations of the Planning Framework and phased masterplan (Page 89) covers all major elements that would be expected. However, one important issue that the Planning Framework/masterplan will need to address is the view of the Local Authority on any proposal by Magnox to leave radioactive material in-situ, any ongoing regulatory requirements that this would necessitate, and any impact that such a decision might have on next planned use. This might be appropriate to highlight as a stand-alone issue or as something to be considered using the headings in the proposed Framework on Page 89. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alan Jones - Hanham District Green Belt Conservation Society |
| **Comment ID** | 17236353/528 |
| **Document Part Name** | Question 14 - Decommisioning of the Oldbury Power Station |
| **Comment** | Yes, a Policy is required, surprised not already in place - ? Surely a Policy was in place for Berkley Power Station - presume that was decommissioned successfully??<br><br>Unable to comment on procedures in this specialist field - surely NBB will have a Template and their Specialists would need to be involved! |
| **Attached documents** | Hanham District Green Belt Conservation Society (Alan Jones).pdf (20.3 MB) |

| | |
|---|---|
| **Respondent Name** | Roy Crew |
| **Comment ID** | 3973121/545 |
| **Document Part Name** | Question 14 - Decommisioning of the Oldbury Power Station |
| **Comment** | My Responses to the specific Local Plan Questions:<br><br>Question 14:<br><br>No Comments |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Zoe Hancock - Bristol Avon Catchment Partnership |
| **Comment ID** | 19832225/689 |
| **Document Part Name** | Question 14 - Decommisioning of the Oldbury Power Station |
| **Comment** | No additional Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Heather Elgar - West of England Nature Partnership |
| **Comment ID** | 19839553/801 |
| **Document Part Name** | Question 14 - Decommisioning of the Oldbury Power Station |
| **Comment** | Please find below Comments from the West of England Nature Partnership (WENP) in response to the South Gloucestershire Local Plan Consultation.<br><br>For transparency, please know that Dominic Mellon (Consultant in Public Health for South Gloucestershire Council) sits on the WENP Board and thus note a declared conflict of interests. This Response reflects the aims and objectives of the Partnership and does not reflect views of individual Board members.<br><br>Question 14: Decommissioning of the Oldbury Power Station:<br><br>WENP would welcome a Decommissioning Policy to enable a more strategic and long-term approach to the cumulative impact of the overall Decommissioning plans, to ensure environmental impacts can best be managed and mitigated. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ian Beckey |
| **Comment ID** | 19952961/905 |
| **Document Part Name** | Question 14 - Decommisioning of the Oldbury Power Station |
| **Comment** | ***Oldbury Power Station (Question 14):***<br><br>*The railway line should be use for the construction and decommissioning/rebuilding of the site. This may also include the Berkeley Branch.*<br><br>*This would keep construction traffic off of the A38.* |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Eric Heath - Avon Wildlife Trust |
| **Comment ID** | 19883713/998 |
| **Document Part Name** | Question 14 - Decommisioning of the Oldbury Power Station |
| **Comment** | AWT would welcome a Decommissioning Policy to enable a more strategic and long-term approach to the cumulative impact of the overall Decommissioning Plans, to ensure environmental impacts can best be managed and mitigated. Given the location of the Oldbury Power Station on the edge of the Severn Estuary the possible ecological benefits of a carefully designed Decommissioning Strategy should not be overlooked. It is also worth noting that the ecological value of the Oldbury Power Station site has diminished over recent years as the internal lagoons have been Decommissioned and begun to scrub over. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Cate Davidson - Sodbury Town Council |
| **Comment ID** | 4877793/1021 |
| **Document Part Name** | Question 14 - Decommisioning of the Oldbury Power Station |
| **Comment** | Dear Planning Team,<br><br>Sodbury Town Council responds as follows to the Local Plan (non strategic) Consultation:<br><br>Q. 14 STC feels a Decommissioning Policy is required and that the proposals cover all matters.<br><br>Please note the Comments as appropriate. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Andrew Rigler |
| **Comment ID** | 1029377/1043 |
| **Document Part Name** | Question 14 - Decommisioning of the Oldbury Power Station |
| **Comment** | 3. A large part of the "old" Oldbury Power Station site could be considered as part of the Severnside Strategic Employment Growth Area as it is Brownfield. This would have the added benefit of making long term use of "new" Oldbury Power Station transport links. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | D. I. Watson |
| **Comment ID** | 19844929/1047 |
| **Document Part Name** | Question 14 - Decommisioning of the Oldbury Power Station |
| **Comment** | There is no mention of the project for the proposed New Nuclear Power Station at Oldbury (Horizon Nuclear Power - 2700MW). The size of the proposed Station is 83% of that of Hinckley C, that is currently under construction, so that the build activities and its associated traffic impacts will be similar. Horizon's current plans are looking at a start date in the late 2020's which is within this Local Plan's timescale. There is no consideration of the impact of this planned development, on the local Road Distribution Network, with all of the associated build traffic and the extra Stone Lorries from the local Quarries. The Document ignores any of this and only talks about the Decommissioning of the existing Station. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Barwood Development Securities Ltd and The Thornbury Landowner Consortium |
| **Comment ID** | 19884545/1101 |
| **Document Part Name** | Question 14 - Decommisioning of the Oldbury Power Station |
| **Comment** | Please find attached Representation. |
| **Attached documents** | Barwood Development Securities Ltd and The Thornbury Landowner Consortium - Savills (Miss. Felicity Tozer).pdf (650 KB) |

| | |
|---|---|
| **Respondent Name** | Leon Flexman - Horizon Nuclear Power |
| **Comment ID** | 20029313/1144 |
| **Document Part Name** | Question 14 - Decommisioning of the Oldbury Power Station |
| **Comment** | SGC is proposing that the new SGLP provides the Policy Framework to support the Decommissioning by NDA of the former Magnox Oldbury Power Station. One of the two key issues put forward for discussion is *'Re-use of redundant facilities, land and/or buildings, prioritising integration with the NNB before other development.'*<br><br>One of the points that Framework would be expected to address/deliver upon is 'Timing in relation to the proposed NNB construction programme, and the potential for cumulative or beneficial effects including socioeconomic, environmental and transport.'<br><br>Horizon supports the principle of such a Framework and will endeavour to work with NDA to support the re-use of redundant facilities, land and/ or buildings. However, it is not possible to know at this stage how extensive any sharing might be, or even how practical given the uncertainty in timings for the Decommissioning activities and the Oldbury NNB. |
| **Attached documents** | Horizon Nuclear Power (Leon Flexman) - Savills (Alex Blake).pdf (537 KB) |

| | |
|---|---|
| **Respondent Name** | Emma Powell - Redrow Homes Limited |
| **Comment ID** | 19737921/1161 |
| **Document Part Name** | Question 14 - Decommisioning of the Oldbury Power Station |

| | |
|---|---|
| **Comment** | Part 3 - Policy Discussion Points:<br><br>Section 3 of the Local Plan Consultation sets out the titles of proposed Strategic Polices that will be included in the next version of the Local Plan. As such we do not have any Comments on the titles, but reserve our position to Comment on the detailed wording at the next Consultation. All Policies will need to be prepared in the context of the emerging NPPF, a final version is expected to published in the next few Months. The Strategic Policies will also need to reflect any changes to the West of England JSP as it progresses through the Examination towards adoption anticipated later in 2019.<br><br>**Question 14:**<br><br>**K. Decommissioning of the Oldbury Power Station**<br><br>**Do you think a Decommissioning Policy is required? Please state your reasons.**<br><br>No Comments**.** |
| **Attached documents** | Redrow Homes Limited (Emma Powell) - Pegasus Group (Mrs. Sarah Hamilton-Foyn).pdf (34.1 MB) |

| | |
|---|---|
| **Respondent Name** | Richard Bull - Environment Agency |
| **Comment ID** | 11527745/1258 |
| **Document Part Name** | Question 14 - Decommisioning of the Oldbury Power Station |
| **Comment** | K. Decommissioning of the Oldbury Power Station:<br><br>The Agency must advise that Oldbury Power Station has not been selected for accelerated Decommissioning. The supporting text should therefore be amended accordingly.<br><br>With regard to the reuse of redundant facilities, there are a number of reservoirs/water storage areas, which it is understood, have become heavily utilised by bird species associated with the adjacent designated sites (Severn Estuary SSSI and SPA). Accordingly, the EIA process must assess the loss of this habitat, if the redundant facilities are Decommissioned and removed. Additionally, the EIA process must consider the possibility of the sites having become areas of habitat for protected species.<br><br>Question 14:<br><br>It would appear that a Decommissioning Policy is required to ensure compliance with appropriate environmental legislation. Details of the phased process should include appropriate mitigation informed by the HRA and EIA. The impacts of radioactive discharge will also need to be considered if there will be a reduction in abstraction/discharge resulting in reduced dilution through Decommissioning.<br><br>The proposed measures adequately cover the need for HRA/EIA but it does not include the need for appropriate mitigation. Whilst this might appear obvious, it may be prudent to include this addendum. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hannah Saunders - Dodington Parish Council |
| **Comment ID** | 19931969/1620 |
| **Document Part Name** | Question 14 - Decommisioning of the Oldbury Power Station |
| **Comment** | **COMMENTS:**<br><br>Members of Dodington Parish Council don't feel informed enough to Comment on this – but would support their fellow Members at Parish and Town Councils that are more immediately effected… (Oldbury on Severn, Rockhampton, Thornbury, etc). |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | E. H. Schubert Will Trust |
| **Comment ID** | 12403425/1686 |
| **Document Part Name** | Question 14 - Decommisioning of the Oldbury Power Station |
| **Comment** | No Comments at this time. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | G. E. Forward |
| **Comment ID** | 20176577/1722 |
| **Document Part Name** | Question 14 - Decommisioning of the Oldbury Power Station |
| **Comment** | No Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | T. K. Hellen |
| **Comment ID** | 3985729/1757 |
| **Document Part Name** | Question 14 - Decommisioning of the Oldbury Power Station |
| **Comment** | It is concerning that there is no evidence in this proposed Plan for infrastructure planning for the proposed nuclear Power Station at Oldbury-on-Severn, particularly since this might generate more employment. This is a glaring omission. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Amanda Grundy - Natural England |
| **Comment ID** | 1410849/1931 |
| **Document Part Name** | Question 14 - Decommisioning of the Oldbury Power Station |
| **Comment** | Oldbury Power Station is immediately adjacent to the Severn Estuary, which is a national and European designated site. Given the close proximity of the Power Station to the estuary there is a risk that Decommissioning activities and/or the storage of radioactive and other hazardous wastes could result in significant adverse effects on features of the various designations.<br><br>A Decommissioning Policy that addresses the issues/matters identified in the Draft Plan could help to secure a range of benefits for people and wildlife, and ensure appropriate measures will be in place to avoid or adequately mitigate adverse effects on the Severn Estuary designated site.<br><br>The England Coast Path, once adopted, will pass close to the Oldbury Power Station and we would welcome consideration of this, including in terms of potential opportunities to create links between the ECP and the wider ROW network. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | The Nuclear Decommissioning Authority (The NDA) |
| **Comment ID** | 20056033/2132 |
| **Document Part Name** | Question 14 - Decommisioning of the Oldbury Power Station |
| **Comment** | Dear Sir/Madam,<br><br>**South Gloucestershire Local Plan 2018 - 2036**<br><br>**Representation On Behalf of The Nuclear Decommissioning Authority**<br><br>Following our recent meeting, we are writing to you on behalf of The Nuclear Decommissioning Authority (the NDA) in respect of the current Consultation on the *South Gloucestershire Local Plan 2018 - 2036* (herein referred to as the New Local Plan). GVA is the appointed Property Advisor for the NDA, and provides Planning Advice across the NDA's UK-wide Estate. We have made Representations to various Local Plans and other Consultations across the UK, affecting various NDA sites.<br><br>This Representation is made in respect of The NDA owned land on and around the existing Oldbury Nuclear Power Station site, the Power Station being operated by Magnox Limited (the Site License Company) under contract to The NDA to carry out the Decommissioning and remediation process. Oldbury generated electricity from 1967 to 2012 when it was shut down. The site is currently being Decommissioned, which involves the systematic removal and management of plant, buildings and waste previously associated with electricity generation and subsequent operations; it is a long process expected to occur throughout and beyond the Plan Period.<br><br>The site is currently in the Care & Maintenance (C&M) preparation phase, following which it will move into C&M (expected 2027). During C&M the site, and any remaining structures, will be kept in a safe and secure state for a number of years until final site clearance is undertaken(expected to be circa 2100).<br><br>**Discussions with South Gloucestershire Council:**<br><br>On 19th April 2018, Representatives from GVA, Magnox and The NDA met with South Gloucestershire Council (SGC) to discuss the existing Policies in relation to nuclear related development found within the adopted Core Strategy and Policies, Sites and Places Plan, along with the February 2018 Consultation Document (in particular Discussion Points K and L).<br><br>**Formal Response to Current Consultation:**<br><br>The NDA is pleased that the Council is intending to provide a Policy specific to the Decommissioning of Oldbury Power Station and a Policy specific to Radioactive Waste in the New Local Plan. For clarity, we consider it appropriate to have separate Planning Policies concerning:<br><br>o The Decommissioning of Oldbury Power Station and proposals for alternative use; |

o The development of a Nuclear New Build (NNB) at Oldbury, and

o Radioactive Waste management.

We also have the following Comments, which reflect the discussion at our recent meeting.

Planning Framework/Phased Masterplan:

As discussed during our recent meeting, The NDA would strongly object to a Policy requirement for a *"Planning Framework and phased masterplan Document"* for the Decommissioning of the Oldbury site, as is indicated in the Consultation Document. The main reasons for this are:

o Decommissioning already has Planning Permission by virtue of the original Planning Permission for the site;

o A new Policy is considered sufficient and an additional Document would add little value to the determination of Planning Applications at the site, and

o The level of information required to support such a detailed Document is not available or certain at this stage.

However, we understand from our recent discussions that SGC would like a written summary of the Decommissioning project which could perhaps form the basis for supporting text to the proposed new Policy. The NDA and Magnox would be happy to work together with SGC to provide this. We also understand that the Council is considering including a Concept Diagram in support of the Policy; The NDA would support the provision of this within the New Local Plan itself, rather than as a subsequent Supplementary Planning Document (i.e. as a figure or an Appendix).

It is considered that the proposed Policy and the Concept Diagram could comfortably cover the topics included as bullet points on Page 89 of the Consultation Document (where they are appropriate and relevant).

Planning Performance Agreements:

While it is appreciated that the Council is open to the use of PPAs, we would ask that it is carefully considered whether the inclusion of reference to this tool within a Planning Policy for the Decommissioning of Oldbury Power Station is necessary or appropriate: the use of PPAs does not require Policy support, and PPAs are a voluntary tool.

In addition, a Policy on this issue is not required here since all parties recognise that PPAs may be beneficial in some circumstances, for example where the Council requires specialist advice. An example where specialist advice may be required is if a unique Application such as for Radioactive Waste disposal were to be submitted. It should be noted that, such Disposal Applications aside, The NDA and Magnox do not envisage the submission of any Planning Applications of such an unusual nature (or of such a scale) as to warrant the specific need for a PPA.

Finally, given the above position that no Planning Framework or phased masterplan is required, a PPA would not be required for the preparation of such a Document.

OTC and Re-use of Redundant Land or Buildings:

Under Discussion Point K in the Consultation Document, SGC has listed two 'key issues' on which feedback is sought. These are:

*1. Policy to support the retention and development of Magnox's Technical Centre at Oldbury as a centre of excellence supporting the Decommissioning of the Magnox fleet of Power Stations.*

*2. Reuse of redundant facilities, land and/or buildings, prioritising integration with the NNB before other development.*

The NDA supports the provision of a flexible Policy which allows for redevelopment of parts of The NDA's land holding for certain alternative uses. However, decisions such as the future use of Oldbury Technical Centre (OTC) and land which could be used as part of the NNB project (above and beyond that sold to Horizon previously) have not yet been made by the NDA. It is important to clarify this and while some parts of the site could possibly come forward for redevelopment proposals during the Plan Period, this is unknown at this stage and therefore any Policy afforded to the Decommissioning of Oldbury Power Station cannot be too specific about individual parcels of land or particular uses (such as NNB).

The NDA accept SGC's aspiration to support the integration of the existing Power Station and the NNB, but cannot support the 'prioritisation' of any land or facilities for integration with NNB that would preclude any other commercially viable redevelopment proposals coming forward. The existing Core Strategy(at Paragraph 18.41) states *"It will be important where possible and practical to re-use the existing Power Station facilities and/or land, to ensure the integration of the Nuclear New Build (NNB) with the existing station as far as is possible"* [our emphasis]. This is considered to be an appropriate caveat, at a minimum, that should sit alongside any Policy aspiration for the release of land or facilities from the existing Power Station to the NNB project.

A Plan (Reference GVA/Oldbury/NDA01) has been included at Annex A to portray the land under the control of the NDA (excludes land released to Horizon) and the nuclear licensed site.

Accelerated Decommissioning:

The Consultation Document includes bullet points on Page 89 which a Planning Framework/phased masterplan (the lack of need for which is addressed above) would be expected to deliver on. The first of these is:

| | |
|---|---|
| | *"Promoting accelerated Decommissioning of the Magnox Power Station to enable earlier reuse of previously developed land, facilities, buildings and or materials particularly for use in the construction and development of a new Nuclear Power Station."*<br><br>Accelerated Decommissioning (or accelerated reactor dismantling) is at a very early stage of consideration by The NDA (currently, it is being considered whether it will be pursued at all, rather than at which sites it may be proposed). Consultation on this matter is expected to take place in the relatively near future.<br><br>It is acknowledged that the Council would support proposals for accelerated Decommissioning at the Oldbury site. However, The NDA considers that the New Local Plan should be silent on this issue, as it will be a decision taken outside the remit of Planning. Furthermore, a Policy which supported accelerated Decommissioning would be in direct conflict with the current Strategy for the site (deferred Decommissioning).<br><br>Reactor dismantling requires the construction of new facilities before dismantling commences in earnest. There would be significant construction undertaken for new buildings to facilitate reactor dismantling, as well as a need for laydown areas, large cranes, portacabins, welfare facilities and other facilities. The overall works (which would remain within the licensed area) would take an estimated ten years to complete. Furthermore, the works would probably overlap with the construction of the NNB at Oldbury, increasing the cumulative environmental impacts on the surrounding area. As it is not a quick process, it would not result in additional land being available in time for NNB construction on the NNB timescales indicated to Magnox. Furthermore, on completion of accelerated reactor dismantling, due to the absence of a GDF, a significant sized ILW store would remain and therefore the existing licensed site would not be totally cleared.<br><br>Policy for Existing Oldbury Power Station:<br><br>While it is not considered to be the NDA's role to suggest a specific Policy wording at this stage, this letter has set out our view on certain key issues in order to assist the Council in drafting a Policy for the existing Oldbury site. Subsequent to the submission of this Representation, The NDA will provide SGC with a written summary of the Decommissioning project which can form the basis for the Policy's supporting text.<br><br>The Concept Diagram should not allocate specific parts of the site for specific uses or proposals, but could serve a useful role in visualising the opportunities which the site presents and in supporting the written Policy. The NDA will work with SGC to agree what form this takes.<br><br>As mentioned above, we consider that a flexible Policy should be introduced for the site given that decisions have not yet been taken about the potential release of land for alternative uses. A flexible Policy which allows for a range of appropriate uses would be the best mechanism to address the final bullet point on Page 89 of the Consultation Document, which relates to the detrimental effects arising from the loss of employment at the existing Power Station. Such uses could potentially include:<br><br>o Decommissioning, Radioactive Waste management and site remediation in line with national Strategies;<br><br>o Traditional employment uses;<br><br>o Education, training and skills uses, and<br><br>o Energy generation.<br><br>There are various examples of what we consider to be 'good practice' in terms of Planning Policies for NDA sites and/or Radioactive Waste management. These include:<br><br>o Policy DM9 of the Somerset Waste Core Strategy (adopted February 2013);<br><br>o Policy 7 of the Essex Waste Local Plan (adopted July 2017);<br><br>o Policy W9 of the Oxfordshire Minerals and Waste Local Plan Core Strategy (adopted September 2017), and<br><br>o Policy GBC 1.E of the Emerging Cheshire West and Chester Local Plan Part Two: Land Allocations and Detailed Policies (Publication Draft Version November 2017).<br><br>**Summary:**<br><br>The NDA is supportive of a site-specific Policy in relation to Oldbury Power Station that supports Decommissioning, Radioactive Waste management and site remediation in line with national Strategies, as well as redevelopment for a range of appropriate alternative uses. Further to the content of this Representation and the matters discussed at our recent meeting, we will write shortly to provide a written summary of the Decommissioning process at Oldbury and begin discussions in relation to a potential 'Concept Diagram' to support a site specific Policy. In the meantime, should you have any further queries then please contact me on or at . |
| **Attached documents** | The Nuclear Decommissioning Authority (The NDA) - GVA Grimley Limited (Owain Griffiths).pdf (405 KB) |

| | |
|---|---|
| **Respondent Name** | Kate Kelliher |
| **Comment ID** | 6031873/49 |
| **Document Part Name** | Question 15 - The storage of Radioactive waste and other hazardous waste |
| **Comment** | A Policy is required for the storage of Radioactive Waste. If there is any stored in South Glos, there should be provision to share the area with Wind or Solar Power. |

| | |
|---|---|
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Margaret Pinder - Sustainable Thornbury |
| **Comment ID** | 19372321/68 |
| **Document Part Name** | Question 15 - The storage of Radioactive waste and other hazardous waste |
| **Comment** | We agree the need for a Policy on the storage of Radioactive and other Hazardous Waste. We agree most of the bulleted points given. However, we have concerns about the requirements regarding 'perception' and demonstrating that environmental, social and economic benefits outweigh any negative impacts. The Policy should seek to keep residents safe and healthy and limit the impact on our environment. Decisions about whether or not to store such waste on site are not taken by the Council but by the Nuclear Decommissioning Authoriy. The Council's Policy should address those issues which fulfil its role. This would include requiring community benefits to offset the burden of long-term storage but avoiding taking a stance on the approach adopted by others in dealing with public perception or the potential benefits. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mayers |
| **Comment ID** | 16271713/101 |
| **Document Part Name** | Question 15 - The storage of Radioactive waste and other hazardous waste |
| **Comment** | Any new Policies to control the Radioactive Waste disposal is welcomed as long as it puts tight restrictions on the companies and is there to protect the wildlife and environment from the adverse effects of Hazardous Waste. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anne Gale |
| **Comment ID** | 16344321/132 |
| **Document Part Name** | Question 15 - The storage of Radioactive waste and other hazardous waste |
| **Comment** | Leave it to the EXPERTS. We don't need untrained people messing about with this stuff. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Thompson |
| **Comment ID** | 17795873/170 |
| **Document Part Name** | Question 15 - The storage of Radioactive waste and other hazardous waste |
| **Comment** | No such Policy should allow the long term storage of Radioactive Waste at Oldbury without a further widely publicised and entirely separate public Consultation. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Helen Johnstone - Stroud District Council |
| **Comment ID** | 14317537/262 |
| **Document Part Name** | Question 15 - The storage of Radioactive waste and other hazardous waste |
| **Comment** | 1. Suggest that Policy for the Storage of Radioactive Waste and Other Hazardous Waste should form part of an overall Policy for the Decommissioning of the Oldbury Power Station to ensure that strategic level impacts and mitigation measures are adequately planned for. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tristan Clark |
| **Comment ID** | 19194177/369 |
| **Document Part Name** | Question 15 - The storage of Radioactive waste and other hazardous waste |
| **Comment** | The use of community benefits to offset the burden of hosting Radioactive Waste on behalf of the nation for possibly a Century or more is the *very least* that the surrounding community can expect. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Simmons - Westerleigh Parish Council |
| **Comment ID** | 17221409/414 |
| **Document Part Name** | Question 15 - The storage of Radioactive waste and other hazardous waste |
| **Comment** | **15L. The storage of Radioactive Waste and Other Hazardous Waste:** |

| | |
|---|---|
| | **Do you think a Radioactive Waste/Hazardous Waste Policy is required?**<br><br>**WPC is unqualified to comment on this.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alveston, Rudgeway, and Earthcott Parish Council |
| **Comment ID** | 19784545/446 |
| **Document Part Name** | Question 15 - The storage of Radioactive waste and other hazardous waste |
| **Comment** | **Same as 14**<br><br>**(Yes, radioactive stuff is nasty and the public can get emotional. A Policy is required even if it simply duplicates national Policy)** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | J. Bond |
| **Comment ID** | 17779105/481 |
| **Document Part Name** | Question 15 - The storage of Radioactive waste and other hazardous waste |
| **Comment** | A Policy is needed, due to the length of time storage is needed (half-life measures only the time for half the remaining radioactivity to disappear). One needs to prevent leaching, accidental "re-discovery" of sites forgotten about, security from theft by terrorists, or even in the case of active "high-level" waste, a continued low level chemical or physical reaction. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Philip Matthews - NuLeAF (The Nuclear Legacy Advisory Forum) |
| **Comment ID** | 19802273/484 |
| **Document Part Name** | Question 15 - The storage of Radioactive waste and other hazardous waste |
| **Comment** | 1. **Comments on Policies:**<br><br>We welcome the inclusion of clear Policies on the Decommissioning of the Oldbury Power Station and on the Storage of Radioactive and other Hazardous Waste. NuLeAF has worked with our Local Authority members over recent years to encourage the inclusion of clear Policies on these topics. Such Policies are of benefit to Local Government and communities, establishing as they do a framework for decision making and for engagement with the nuclear industry.<br><br>1. **The Storage of Radioactive Waste and Other Hazardous Waste:**<br><br>We support the introduction of the new Policy on Radioactive Waste. As noted earlier, we believe it is important that Local Plans and Waste Plans include Policies on this issue. Many communities across England have radioactive material to manage, but this is particularly the case for those communities with existing or decommissioned Nuclear Power Stations. A Policy on Radioactive Waste will enable effective use of the Planning System to manage local nuclear legacy sites and to engage with the nuclear industry, delivering the best outcome for communities.<br><br>The Policy is clear. It is welcome that the Policy also covers the management of hazardous non-nuclear materials such as asbestos, a major issue for many Magnox Stations.<br><br>We strongly support the inclusion of a statement that existing or proposed Nuclear Stations at Oldbury should minimise impacts on the host community and environment, should address the issue around public perception of long term storage of waste, and recognise the need for comprehensive packages of developer contribution and community benefits.<br><br>We agree with the key issues that are set out on Page 91. They are rooted in the principles of sustainable waste management and sustainable transport, and seek to minimise negative economic, social or environmental impacts. We believe though that it would be helpful if the Policy addressed the issue of in-situ and on-site disposal.<br><br>In-situ disposal can be justified as part of sustainable waste management and may be the best and most sustainable management option. However, the benefits and drawbacks of any such decision to leave radioactive material on site will have to be carefully considered against the Council's wider objectives for the Oldbury site and surrounding area.<br><br>I hope these Comments are helpful. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alan Jones - Hanham District Green Belt Conservation Society |
| **Comment ID** | 17236353/534 |
| **Document Part Name** | Question 15 - The storage of Radioactive waste and other hazardous waste |
| **Comment** | Surely other Local Authorities have dealt with these issues and have tried and tested Policies for storage/handling/transporting RA waste?<br><br>Surely any Policy needs to incorporate a robust monitoring scheme, both on the site and in the local communities. |
| **Attached documents** | Hanham District Green Belt Conservation Society (Alan Jones).pdf (20.3 MB) |

| | |
|---|---|
| **Respondent Name** | Roy Crew |
| **Comment ID** | 3973121/546 |
| **Document Part Name** | Question 15 - The storage of Radioactive waste and other hazardous waste |
| **Comment** | My Responses to the specific Local Plan Questions:<br><br>Question 15:<br><br>No Comments |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Zoe Hancock - Bristol Avon Catchment Partnership |
| **Comment ID** | 19832225/690 |
| **Document Part Name** | Question 15 - The storage of Radioactive waste and other hazardous waste |
| **Comment** | No additional Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Heather Elgar - West of England Nature Partnership |
| **Comment ID** | 19839553/802 |
| **Document Part Name** | Question 15 - The storage of Radioactive waste and other hazardous waste |
| **Comment** | Please find below Comments from the West of England Nature Partnership (WENP) in response to the South Gloucestershire Local Plan Consultation.<br><br>For transparency, please know that Dominic Mellon (Consultant in Public Health for South Gloucestershire Council) sits on the WENP Board and thus note a declared conflict of interests. This Response reflects the aims and objectives of the Partnership and does not reflect views of individual Board members.<br><br>Question 15: The Storage of Radioactive Waste and Other Hazardous Waste:<br><br>WENP would welcome a Radioactive Waste/Hazardous Waste Policy to enable a more strategic and long-term approach to the best management of such waste for the health of society and the environment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Cate Davidson - Sodbury Town Council |
| **Comment ID** | 4877793/1022 |
| **Document Part Name** | Question 15 - The storage of Radioactive waste and other hazardous waste |
| **Comment** | Dear Planning Team,<br><br>Sodbury Town Council responds as follows to the Local Plan (non strategic) Consultation:<br><br>Q. 15 STC feels a Radioactive/Hazardous Waste Policy is required and that proposals cover all matters. |

| | |
|---|---|
| | Please note the Comments as appropriate. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Gill and Mike Dunkley |
| **Comment ID** | 19845441/1063 |
| **Document Part Name** | Question 15 - The storage of Radioactive waste and other hazardous waste |
| **Comment** | We must not be 'sold out' by the offer of financial benefits for storing Radioactive Waste. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Leon Flexman - Horizon Nuclear Power |
| **Comment ID** | 20029313/1145 |
| **Document Part Name** | Question 15 - The storage of Radioactive waste and other hazardous waste |
| **Comment** | We would agree that a Radioactive Waste Policy would be consistent with the approach adopted by other Local Authorities who host Nuclear Power facilities (including the Isle of Anglesey County Council, the Local Authority for Horizon's lead project, Wylfa Newydd). We agree with many of the principles and issues set out in SGC's Consultation, such as ensuring consistency with the national Strategy for Radioactive Waste Management and the application of the Waste Hierarchy, and we would welcome the chance to work with SGC as any new Policy is developed.<br><br>One issue we would question is the need for the new Policy to consider community benefits associated with hosting facilities for the long-term storage of Radioactive Waste, at least as far as it applies to a new build project such as ours. We are not clear why there would be a requirement for separate and distinct consideration of community benefits associated purely with the Radioactive Waste facilities when, in the case of Nuclear New Build, these facilities would form an integral part of the development. Any discussion around community benefits for the new nuclear development would therefore already consider issues associated with interim storage of Radioactive Waste, alongside other considerations. We believe there is more value in considering community benefits for the whole development in the round rather than looking to split out this consideration for individual aspects of the development. |
| **Attached documents** | Horizon Nuclear Power (Leon Flexman) - Savills (Alex Blake).pdf (537 KB) |

| | |
|---|---|
| **Respondent Name** | Emma Powell - Redrow Homes Limited |
| **Comment ID** | 19737921/1162 |
| **Document Part Name** | Question 15 - The storage of Radioactive waste and other hazardous waste |
| **Comment** | Part 3 - Policy Discussion Points:<br><br>Section 3 of the Local Plan Consultation sets out the titles of proposed Strategic Polices that will be included in the next version of the Local Plan. As such we do not have any Comments on the titles, but reserve our position to Comment on the detailed wording at the next Consultation. All Policies will need to be prepared in the context of the emerging NPPF, a final version is expected to published in the next few Months. The Strategic Policies will also need to reflect any changes to the West of England JSP as it progresses through the Examination towards adoption anticipated later in 2019.<br><br>**Question 15:**<br><br>**L. The storage of Radioactive Waste and Other Hazardous Waste**<br><br>**Do you think a Radioactive Waste/Hazardous Waste Policy is required? Please state your reasons.**<br><br>No Comments. |
| **Attached documents** | Redrow Homes Limited (Emma Powell) - Pegasus Group (Mrs. Sarah Hamilton-Foyn).pdf (34.1 MB) |

| | |
|---|---|
| **Respondent Name** | Hannah Saunders - Dodington Parish Council |
| **Comment ID** | 19931969/1621 |
| **Document Part Name** | Question 15 - The storage of Radioactive waste and other hazardous waste |
| **Comment** | **COMMENTS:**<br><br>Members feel that a Policy is required – and in particular one that will minimise the effect of transport movements – as the villages/towns near Oldbury Power Station are residentially built up – and there shouldn't be any more transport movements than necessary. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | E. H. Schubert Will Trust |

| | |
|---|---|
| **Comment ID** | 12403425/1687 |
| **Document Part Name** | Question 15 - The storage of Radioactive waste and other hazardous waste |
| **Comment** | No Comments at this time. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | G. E. Forward |
| **Comment ID** | 20176577/1723 |
| **Document Part Name** | Question 15 - The storage of Radioactive waste and other hazardous waste |
| **Comment** | No Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David Jonathan Redgewell |
| **Comment ID** | 16767297/1768 |
| **Document Part Name** | Question 15 - The storage of Radioactive waste and other hazardous waste |
| **Comment** | Oldbury Power Station - Question 15:<br><br>There is a need to protect the THORNBURY Railway Line for Freight Use In decommission of the Power Station and rebuilding the New Power Station. The Line should extend into THORNBURY as a Light Rail Service for passengers and Workers at the Power Station.<br><br>Housing Will need to be provided for Workers. Made using the site at Littleton Upon Severn.<br><br>Under Local economy Page 15.<br><br>Training and Skills are for OLDBURY Power Station at Filton and Berkeley Colleges and UWE.<br><br>The Plan does not Mention the need for a Green Travel Plan and Bus Network similar to Bridgwater or use of Railheads for Buses at Bristol Parkway or Charfield a new station. If NOT re-opened Cam and Dursley.<br><br>A Condition on OLDBURY Power Station should be to open (Bristol to Gloucester Line Station as a railhead. With Bus Links to OLDBURY Power Station.<br><br>Housing Will also be required In THORNBURY and Charfield for the Workforce.<br><br>Buckover Could provide a Housing Affordable Homes for OLDBURY WORKFORCE. But Will require SHOPS, BANKS, Church, Schools, Sports facilities, Libraries. Bus network to service OLDBURY POWER STATION.<br><br>For Storage of Intermediate Low Level Waste at Berkeley Power Station a movement by ship is required up the River Severn Bristol Channel or Rail Link from THORNBURY TO SHARPNESS. THE Issue need discussion with Stroud District Council and Gloucestershire County Council. Train also need to Operator to Cumbria Sellafield site for reprocessing. DRS Have a Railhead at Berkeley Station. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Amanda Grundy - Natural England |
| **Comment ID** | 1410849/1932 |
| **Document Part Name** | Question 15 - The storage of Radioactive waste and other hazardous waste |
| **Comment** | Oldbury Power Station is immediately adjacent to the Severn Estuary, which is a national and European designated site. Given the close proximity of the Power Station to the estuary there is a risk that Decommissioning activities and/or the storage of radioactive and other hazardous wastes could result in significant adverse effects on features of the various designations.<br><br>A Decommissioning Policy that addresses the issues/matters identified in the Draft Plan could help to secure a range of benefits for people and wildlife, and ensure appropriate measures will be in place to avoid or adequately mitigate adverse effects on the Severn Estuary designated site.<br><br>The England Coast Path, once adopted, will pass close to the Oldbury Power Station and we would welcome consideration of this, including in terms of potential opportunities to create links between the ECP and the wider ROW network. |

| | |
|---|---|
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | The Nuclear Decommissioning Authority (The NDA) |
| **Comment ID** | 20056033/2133 |
| **Document Part Name** | Question 15 - The storage of Radioactive waste and other hazardous waste |
| **Comment** | Radioactive Waste:<br><br>For clarity, The NDA considers that a Policy in relation to Radioactive Waste should relate to the 'management' of such waste, which would encompass proposals for treatment, processing, short term storage, long term storage, disposal etc. Any Policy should be consistent with The NDA Strategy (which represents national Strategy for Decommissioning, Radioactive Waste management and land remediation within The NDA Estate). It may also be appropriate for the Policy criteria to include the phrase *"the proposals are consistent with national Strategy for Radioactive Waste management."*<br><br>It is our understanding that while separate Policies would be provided for the existing and proposed Power Stations at Oldbury, there could be a single Policy relating to Radioactive Waste management. If this is the case, a single Radioactive Waste Policy should clearly recognise the different requirements/programmes (timing) of each of the two nuclear sites during the Plan Period, and that it may or may not be possible for the sharing of facilities/resources to be undertaken.<br><br>SGC are aware of the emerging Policy1 and Regulatory Guidance concerning site remediation and site end states. The Environmental Regulators' Draft Guidance2 will require Magnox(and other Nuclear Site Licence holders) to review the site-wide waste management approach to identify and deliver an optimised site end state. This includes consideration of options for in-situ or other on site disposal of whole or part structures and excavated land contamination as appropriate. Therefore, the New Local Plan cannot preclude options such as the disposal of Radioactive Waste on site.<br><br>1 Discussion paper on the Regulation of nuclear sites in the final stages of Decommissioning and clean-up (November 2016) (https://www.gov.uk/government/publications/discussion-paper-on-the-regulation-of-nuclear-sites-in-the-final-stages-ofdecommissioning-and-clean-up)<br><br>2 Guidance on Requirements for Release of Nuclear Sites from Radioactive Substances Regulation (February 2016)<br><br>(https://consultation.sepa.org.uk/operations-portfolio/grr/)<br><br>Community Benefits:<br><br>Discussion Point L of the Consultation Document makes reference to *"packages of community benefits to be provided by the developer to offset and compensate the community for the burden imposed by hosting the project."* It is not anticipated that any Applications for development will be made at the existing Oldbury site over the course of the Plan Period that would be of the scale or nature to warrant the request for such community benefits.<br><br>SGC are aware of The NDA's position on non-statutory/voluntary community benefits (those not required in Planning terms). There are other mechanisms, outside Planning Legislation and Policy, already in place to ensure that the community hosting an NDA facility can receive social and economic benefit. These measures fall within NDA's statutory duties under the Energy Act 2004.<br><br>Any Policy that refers to the provision of non-statutory community benefits should make it clear that anything not required in Planning terms is deemed voluntary and cannot be a reason for granting Planning Permission. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kate Kelliher |
| **Comment ID** | 6031873/50 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | Heat pumps using either the air or the ground are really essential in areas off the gas grid. South Glos should not allow any development without this. Off grid housing is dependent on the delivery of LPG, oil it coal. It involves a considerable money outlay to get a delivery and deliveries are also dependent on the ability of the supplier to deliver, which is weather dependent, especially if roads and driveways are not gritted in icy conditions. Heat pumps would help eliminate the fuel poverty associated with this type of delivery system.<br><br>Solar on roofs of new buildings would ideally be aligned in an East - West direction, to cater for morning and evening peak demand for energy. So, roofs should be aligned in this direction. The current location of solar facing South produces electricity at a less useful time of the day.<br><br>Heat Networks are a great idea, but no one who lives with them appear to like them very much. They were prevalent in the former Soviet etc East of Europe. Maybe lessons can be learned from there. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Margaret Pinder - Sustainable Thornbury |
| **Comment ID** | 19372321/69 |

| | |
|---|---|
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | We strongly agree the need to incorporate CO2 targets into new developments.<br><br>We strongly agree increasing standards either to Breeam excellent or Passivhaus standards in order to future proof new developments.<br><br>We strongly agree the need to have a Policy for excess heating - addressing it through design, not air conditioning. Consider higher builds in order to create shade (as found in most Mediterranean countries).<br><br>We fully support the move to higher requirements for developments becoming zero Carbon. If new developments do not take this approach, we will have lost opportunities for moving towards our emissions targets. Such housing will provide positive benefits for residents also in reduction of energy bills. Moreover, no building (for whatever purpose) should be outside the scope of this requirement in order to future-proof all developments and minimise resource requirements. We should not be building anything which will require adaptation/refurbishment in order for it to survive the challenges Climate Change will impose. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mayers |
| **Comment ID** | 16271713/103 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | All new homes should have the new rule that they must be built with Solar Panels already installed. This would make the homes much more attractive to buyers and significantly help with the Climate Change problem. However it seems that Climate Change is already too far ahead and there is already no hope due to over-population not just of the UK but the world. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Gillian Sanders - Wessex Water |
| **Comment ID** | 19455361/239 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | • Section 1 – We are concerned by the proposed Policy Application that all major development proposals should contribute Renewable Energy or CO2 emissions reduction to their maximum potential where technically feasible and viable. Note that the Planning definition of major development includes waste development (which includes waste water), potentially bringing all such developments within the ambit of this Policy. Any eventual Policy should clearly set out whether this expectation is focused on housing and related developments, or has a wider coverage. If the latter, it should be noted that the majority of sewerage developments will have very limited ability to contribute towards these goals and that such requirements may be covered by other regulatory regimes.<br>• Section 8 – Geothermal Energy. We would note that any future use of Geothermal Energy from minewater would need to be carefully controlled to ensure that discharges of the heated water (which may also include elevated levels of natural contaminants) do not contribute to deterioration of water quality and river habitats. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Helen Johnstone - Stroud District Council |
| **Comment ID** | 14317537/263 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | 1. Support the rationalisation of existing Policies regarding sustainable construction, renewable and low carbon energy generation, renewable or low carbon district heat networks and on-site renewable and low carbon energy into two Policies in the new Local Plan covering a) Energy Management in New Development and b) Renewable and Low Carbon Energy Systems.<br>2. Suggest that Policies for energy efficient, low carbon building technologies and design need to recognise the need to have regard to the character and local distinctiveness of places alongside mitigating the impacts of Climate Change. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Claire Young |
| **Comment ID** | 916289/350 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | 1. I agree that the criteria should be incorporated into Planning Policy but think it should apply to all developments, whatever the scale.<br><br>2. I agree that higher standards should be required.<br><br>3. I agree that this factor should be addressed.<br><br>4. I agree with this approach. |

| | |
|---|---|
| | 5. I would support reducing the threshold. I am concerned that if the Policy on smaller developments connecting to Heat Networks is changed it will affect the deliverability of potential Heat Networks.<br><br>6. Electric cars effectively provide a storage facility for Renewable Energy. One electricity provider has already come up with a scheme where users can sell back electricity stored in their cars to the grid at peak times. This is another factor to take into account when considering charging point provision.<br><br>7. I agree with this proposal.<br><br>8. Yes, I agree that this should be explored. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tristan Clark |
| **Comment ID** | 19194177/372 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | South Gloucestershire Council should explore it but first funds should be spent on fully mapping all the mine shafts and mining activity at the Coalpit Heath SDL before they consider anything else at the site. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christina Biggs - Friends of Suburban Bristol Railways |
| **Comment ID** | 19467329/382 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | For us the best form of Public Transport is rail, with electrification both on long-distance lines and also the use of battery or hydrogen-fuelled local trains. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Simmons - Westerleigh Parish Council |
| **Comment ID** | 17221409/415 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **16. ENERGY MANAGEMENT:**<br><br>**16M1 a) What do you think about this approach?**<br><br>**WPC agree with the intended approach.**<br><br>**16M1 b) What criteria should be set?**<br><br>**WPC has no knowledge on criteria to be set.**<br><br>**16M4 Reducing CO2 Emissions: What are your views on this**?<br><br>**WPC agrees that targets must be set and developers held to them.**<br><br>**16M8 Geothermal Energy: Is this an opportunity that we should explore further?**<br><br>**WPC supports the study providing all local environmental factors and effects are considered.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kevin Wilkinson - Avon and Somerset Police |
| **Comment ID** | 1052481/423 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | The consideration for the use of BREEAM 'Excellent' is supported from a crime prevention viewpoint as it is included in the standard. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alveston, Rudgeway, and Earthcott Parish Council |
| **Comment ID** | 19784545/447 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **Yes, press for good energy management even though it may cost more.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Donna Ford - Iron Acton Parish Council |
| **Comment ID** | 1060385/469 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **Energy Management in New Development; and Renewable and Low Carbon Energy Systems:**<br><br>Iron Acton Parish Council supports the direction of South Gloucestershire's thinking and agrees that issues related to Climate Change and the mitigation of its impacts should be addressed through the Planning System. While the Parish Council lacks the expertise to comment on technical questions, it agrees that all reasonable opportunities should be taken to reduce South Gloucestershire's carbon footprint and reduce its vulnerability to changes in our climate and to extreme weather events.<br><br>The Parish Council is aware of an increasing number of energy-related initiatives in Iron Acton and neighbouring Parishes such as photovoltaic farms, wind turbines, peak-lopping diesel generator depots, and energy storage depots. It supports including provisions in the new Local Plan to make clear the contributions new developments can and should make to reducing Carbon Dioxide emissions, to increasing energy efficiency, and to local Renewable Energy production, storage and distribution. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christine Hunter |
| **Comment ID** | 19809025/494 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **Energy Management in New Development; and Renewable and Low Carbon Energy Systems:**<br><br>I agree that issues related to Climate Change and the mitigation of its impacts should be addressed through the Planning System. All reasonable opportunities should be taken to reduce South Gloucestershire's carbon footprint and reduce its vulnerability to changes in our climate and to extreme weather events. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alan Jones - Hanham District Green Belt Conservation Society |
| **Comment ID** | 17236353/538 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | 1.0 CO2 Omissions and Renewable Generation - Why no measurable levels - proportion of energy etc included in target stated.<br><br>2.0 Unclear what type of development will this apply to? Industrial/Offices/maybe apply also to shops? Presume not dwellings.<br><br>3.0 This is basic design criteria already adopted by competent designers.<br><br>4.0 How can this be applied when SGC's own CO2 monitoring is only demonstrating modest improvements?<br><br>7.0 Cannot understand implications here!<br><br>8.0 ? Why? |
| **Attached documents** | Hanham District Green Belt Conservation Society (Alan Jones).pdf (20.3 MB) |

| | |
|---|---|
| **Respondent Name** | Paul Chapman - Iron Acton Parish Council |
| **Comment ID** | 19809537/560 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **Energy Management in New Development; and Renewable and Low Carbon Energy Systems:** |

| | |
|---|---|
| | I agree that issues related to Climate Change and the mitigation of its impacts should be addressed through the Planning System. All reasonable opportunities should be taken to reduce South Gloucestershire's carbon footprint and reduce its vulnerability to changes in our climate and to extreme weather events. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David Hatherell |
| **Comment ID** | 19830849/575 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **Energy Management in New Development; and Renewable and Low Carbon Energy Systems:**<br><br>I agree that issues related to Climate Change and the mitigation of its impacts should be addressed through the Planning System. All reasonable opportunities should be taken to reduce South Gloucestershire's carbon footprint and reduce its vulnerability to changes in our climate and to extreme weather events. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | John O'Donnell |
| **Comment ID** | 18604385/586 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **Energy Management in New Development; and Renewable and Low Carbon Energy Systems:**<br><br>I agree that issues related to Climate Change and the mitigation of its impacts should be addressed through the Planning System. All reasonable opportunities should be taken to reduce South Gloucestershire's carbon footprint and reduce its vulnerability to changes in our climate and to extreme weather events. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Joseph Hatherell |
| **Comment ID** | 19831681/597 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **Energy Management in New Development; and Renewable and Low Carbon Energy Systems:**<br><br>I agree that issues related to Climate Change and the mitigation of its impacts should be addressed through the Planning System. All reasonable opportunities should be taken to reduce South Gloucestershire's carbon footprint and reduce its vulnerability to changes in our climate and to extreme weather events. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Karen Longden |
| **Comment ID** | 19831809/616 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **Energy Management in New Development; and Renewable and Low Carbon Energy Systems:**<br><br>I agree that issues related to Climate Change and the mitigation of its impacts should be addressed through the Planning System. All reasonable opportunities should be taken to reduce South Gloucestershire's carbon footprint and reduce its vulnerability to changes in our climate and to extreme weather events. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Jane Driver |
| **Comment ID** | 5134785/630 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **Energy Management in New Development; and Renewable and Low Carbon Energy Systems:**<br><br>I agree that issues related to Climate Change and the mitigation of its impacts should be addressed through the Planning System. All reasonable opportunities should be taken to reduce South Gloucestershire's carbon footprint and reduce its vulnerability to changes in our climate and to extreme weather events. |

| | |
|---|---|
| | |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Diana Porter-Smith |
| **Comment ID** | 10874433/641 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **Energy Management in New Development; and Renewable and Low Carbon Energy Systems:**<br><br>I agree that issues related to Climate Change and the mitigation of its impacts should be addressed through the Planning System. All reasonable opportunities should be taken to reduce South Gloucestershire's carbon footprint and reduce its vulnerability to changes in our climate and to extreme weather events. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Michael Keenan |
| **Comment ID** | 2796353/653 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **Energy Management in New Development; and Renewable and Low Carbon Energy Systems:**<br><br>I agree that issues related to Climate Change and the mitigation of its impacts should be addressed through the Planning System. All reasonable opportunities should be taken to reduce South Gloucestershire's carbon footprint and reduce its vulnerability to changes in our climate and to extreme weather events. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Richard Hunter |
| **Comment ID** | 12513441/668 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **Energy Management in New Development; and Renewable and Low Carbon Energy Systems:**<br><br>I agree that issues related to Climate Change and the mitigation of its impacts should be addressed through the Planning System. All reasonable opportunities should be taken to reduce South Gloucestershire's carbon footprint and reduce its vulnerability to changes in our climate and to extreme weather events. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Zoe Hancock - Bristol Avon Catchment Partnership |
| **Comment ID** | 19832225/691 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | No additional Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Rosemary White |
| **Comment ID** | 10707009/702 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | Energy Management in New Development; and Renewable and Low Carbon Energy Systems:<br><br>I agree that issues related to Climate Change and the mitigation of its impacts should be addressed through the Planning System. All reasonable opportunities should be taken to reduce South Gloucestershire's carbon footprint and reduce its vulnerability to changes in our climate and to extreme weather events. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Purchase |
| **Comment ID** | 2804385/713 |

| | |
|---|---|
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **Energy Management in New Development; and Renewable and Low Carbon Energy Systems:**<br><br>I agree that issues related to Climate Change and the mitigation of its impacts should be addressed through the Planning System. All reasonable opportunities should be taken to reduce South Gloucestershire's carbon footprint and reduce its vulnerability to changes in our climate and to extreme weather events. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Suzanna Keenan |
| **Comment ID** | 17805057/756 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **Energy Management in New Development; and Renewable and Low Carbon Energy Systems:**<br><br>I agree that issues related to Climate Change and the mitigation of its impacts should be addressed through the Planning System. All reasonable opportunities should be taken to reduce South Gloucestershire's carbon footprint and reduce its vulnerability to changes in our climate and to extreme weather events. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Simon Whittard |
| **Comment ID** | 12489153/768 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **Energy Management in New Development; and Renewable and Low Carbon Energy Systems:**<br><br>I agree that issues related to Climate Change and the mitigation of its impacts should be addressed through the Planning System. All reasonable opportunities should be taken to reduce South Gloucestershire's carbon footprint and reduce its vulnerability to changes in our climate and to extreme weather events. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Heather Elgar - West of England Nature Partnership |
| **Comment ID** | 19839553/803 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | Please find below Comments from the West of England Nature Partnership (WENP) in response to the South Gloucestershire Local Plan Consultation.<br><br>For transparency, please know that Dominic Mellon (Consultant in Public Health for South Gloucestershire Council) sits on the WENP Board and thus note a declared conflict of interests. This Response reflects the aims and objectives of the Partnership and does not reflect views of individual Board members.<br><br>Question 16: Energy Management in New Development; and Renewable and Low Carbon Energy Systems:<br><br>No Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Robert and Diana Pardoe |
| **Comment ID** | 10784545/815 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **Energy Management in New Development; and Renewable and Low Carbon Energy Systems:**<br><br>I agree that issues related to Climate Change and the mitigation of its impacts should be addressed through the Planning System. All reasonable opportunities should be taken to reduce South Gloucestershire's carbon footprint and reduce its vulnerability to changes in our climate and to extreme weather events. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Brian Hackland |
| **Comment ID** | 8354337/832 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **Energy Management in New Development; and Renewable and Low Carbon Energy Systems:**<br><br>Climate Change threatens the livelihoods and wellbeing of everyone in the UK. We share the responsibility to reduce Global Warming and to mitigate, as far as possible, its effects. I agree that issues related to Climate Change and the mitigation of its impacts should be addressed through the Planning System. All reasonable opportunities should be taken to reduce South Gloucestershire's carbon footprint and reduce its vulnerability to changes in our climate and to extreme weather events. The Local Plan should make it clear that developers must play their part. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anna Webster |
| **Comment ID** | 19843617/843 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **Energy Management in New Development; and Renewable and Low Carbon Energy Systems:**<br><br>I agree that issues related to Climate Change and the mitigation of its impacts should be addressed through the Planning System. All reasonable opportunities should be taken to reduce South Gloucestershire's carbon footprint and reduce its vulnerability to changes in our climate and to extreme weather events. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Victoria & John Vlietstra |
| **Comment ID** | 19843937/854 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **Energy Management in New Development; and Renewable and Low Carbon Energy Systems:**<br><br>We agree that issues related to Climate Change and the mitigation of its impacts should be addressed through the Planning System. All reasonable opportunities should be taken to reduce South Gloucestershire's carbon footprint and reduce its vulnerability to changes in our climate and to extreme weather events. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christina Fussell |
| **Comment ID** | 19843969/865 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **Energy Management in New Development; and Renewable and Low Carbon Energy Systems:**<br><br>I agree that issues related to Climate Change and the mitigation of its impacts should be addressed through the Planning System. All reasonable opportunities should be taken to reduce South Gloucestershire's carbon footprint and reduce its vulnerability to changes in our climate and to extreme weather events.<br><br>Special consideration should be given to Renewables, Solar Panels, PV and also rainwater tanks to conserve water and give proper consideration to water drain off. I believe unless stringent guidelines are given to developers, whose main concern is bottom line profits, we will continue to miss Climate Change targets and also miss opportunities for a change in the way we allow large companies to deliver the people's homes with regard to their future sustainability. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Paul Fussell |
| **Comment ID** | 19844001/876 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **Energy Management in New Development; and Renewable and Low Carbon Energy Systems:**<br><br>I agree that issues related to Climate Change and the mitigation of its impacts should be addressed through the Planning System. All reasonable opportunities should be taken to reduce South Gloucestershire's carbon footprint and reduce its vulnerability to changes in our climate and to extreme weather events. |

| | |
|---|---|
| | Special consideration should be given to Renewables, Solar Panels, PV and also rainwater tanks to conserve water and give proper consideration to water drain off. I believe unless stringent guidelines are given to developers, whose main concern is bottom line profits, we will continue to miss Climate Change targets and also miss opportunities for a change in the way we allow large companies to deliver the people's homes with regard to their future sustainability. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Oliver Fussell |
| **Comment ID** | 10784449/888 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **Energy Management in New Development; and Renewable and Low Carbon Energy Systems:**<br><br>I agree that issues related to Climate Change and the mitigation of its impacts should be addressed through the Planning System. All reasonable opportunities should be taken to reduce South Gloucestershire's carbon footprint and reduce its vulnerability to changes in our climate and to extreme weather events.<br><br>Special consideration should be given to Renewables, Solar Panels, PV and also rainwater tanks to conserve water and give proper consideration to water drain off. I believe unless stringent guidelines are given to developers, whose main concern is bottom line profits, we will continue to miss Climate Change targets and also miss opportunities for a change in the way we allow large companies to deliver the people's homes with regard to their future sustainability. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tom Barnes |
| **Comment ID** | 19844673/899 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **Energy Management in New Development; and Renewable and Low Carbon Energy Systems:**<br><br>I agree that issues related to Climate Change and the mitigation of its impacts should be addressed through the Planning System. All reasonable opportunities should be taken to reduce South Gloucestershire's carbon footprint and reduce its vulnerability to changes in our climate and to extreme weather events.<br><br>Special consideration should be given to Renewables, Solar Panels, PV and also rainwater tanks to conserve water and give proper consideration to water drain off. I believe unless stringent guidelines are given to developers, whose main concern is bottom line profits, we will continue to miss Climate Change targets and also miss opportunities for a change in the way we allow large companies to deliver the people's homes with regard to their future sustainability. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Peter Barker - Latteridge Road Community Group |
| **Comment ID** | 6622945/944 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **Energy Management in New Development; and Renewable and Low Carbon Energy Systems:**<br><br>I agree that issues related to Climate Change and the mitigation of its impacts should be addressed through the Planning System. All reasonable opportunities should be taken to reduce South Gloucestershire's carbon footprint and reduce its vulnerability to changes in our climate and to extreme weather events.<br><br>See Comment above about the need for mandatory double glazing in new-build homes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kate Edmonds |
| **Comment ID** | 19883393/955 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **Energy Management in New Development; and Renewable and Low Carbon Energy Systems:**<br><br>I agree that issues related to Climate Change and the mitigation of its impacts should be addressed through the Planning System. All reasonable opportunities should be taken to reduce South Gloucestershire's carbon footprint and reduce its vulnerability to changes in our climate and to extreme weather events. |

| | |
|---|---|
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David and Tracey Jones |
| **Comment ID** | 19883585/975 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **Energy Management in New Development; and Renewable and Low Carbon Energy Systems:**<br><br>I agree that issues related to Climate Change and the mitigation of its impacts should be addressed through the Planning System. All reasonable opportunities should be taken to reduce South Gloucestershire's carbon footprint and reduce its vulnerability to changes in our climate and to extreme weather events. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Cate Davidson - Sodbury Town Council |
| **Comment ID** | 4877793/1023 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | Dear Planning Team,<br><br>Sodbury Town Council responds as follows to the Local Plan (non strategic) Consultation:<br><br>Q. 16 STC supports the use of Renewables wherever possible but every site should be considered on its own merits.<br><br>Please note the Comments as appropriate. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Andrew Rigler |
| **Comment ID** | 1029377/1044 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | 4. I am unable to find any truly progressive proposals such as (I suggest) "all new housing to incorporate PV Panels as part of basic design." |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Felicity Harrison |
| **Comment ID** | 4391425/1060 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **Environmental Policies re: Development:**<br><br>The current Planning Policies that are in place are:<br><br>CS1(8) - High Quality Design (Point 8 - Sustainable Construction). This should include the passivhaus as we move towards the target of zero carbon by 2050.<br><br>CS3 - Renewable and low carbon energy generation.<br><br>CS4 - Renewable or low carbon district heat networks.<br><br>PSP6 - On site renewable and low carbon energy. All houses should have at least one South facing roof for the automatic installation of Solar Panels or tiles.<br><br>It is proposed that the four Policies set out in the Core Strategy and PSP Plan will be replaced by two Policies in the new Local Plan, which will cover:<br><br>♦ Energy Management in new development; and |

| | |
|---|---|
| | ♦ Renewable and Low Carbon Energy Systems.<br><br>The new Policies will cover the same issues that are covered by the four current Policies, but the wording will be rationalised and refined. In addition, the Policies may be expanded to address other key issues that are currently being explored. These *additions would enable the Policies to go further in addressing the impacts of Climate Change and also grasping related economic opportunities. The findings of Evidence Studies being undertaken, and the Responses received to this Consultation, could result in significant changes to the Policy position proposed in the new Local Plan.*<br><br>**CO2 Emissions and Renewable Energy Generation:**<br><br>1. We are considering incorporating the South Gloucestershire Climate Change Strategy targets for CO2 emissions and Renewable Energy generation into Planning Policy in order to: reflect good practice; give the targets appropriate weight in Planning terms; and, make it clear to Applicants that we expect all new development to contribute to the targets. The Policy will require development proposals to demonstrate how they will help to deliver the targets in a manner proportionate to the scale of development. We are suggesting that all major development proposals (10 or more dwellings, and 1000sqm or more of 'non-domestic' floorspace) should contribute to their maximum potential where technically feasible and viable Design Standards<br><br>2. Existing Policy encourages high standards of energy conservation and efficiency in the design of development, for example BREEAM 'very good.' This will be a primary indicator of good design. It is suggested that a similar approach is retained in the new Policies, but that higher standards are encouraged, for example the Passivhaus Standard and/or BREEAM 'Excellent.'<br><br>3. Overheating is an increasingly significant impact of Climate Change and other Local Authorities are exploring ways of addressing the issue through Planning Policies. We are proposing to incorporate the issue into the list of factors that are to be addressed through the design of development, for example, orientation of buildings, roof pitches, etc.<br><br>**Reducing CO2 Emissions:**<br><br>4. Advances in technology, building design, and also falling costs of Renewable Energy infrastructure means that the scope of the current 'Merton Rule' Policy (set out in Policy PSP6, which requires all major (10 dwellings) Greenfield residential developments to reduce CO2 emissions by at least 20% via the use of renewable and/or low carbon energy sources on or near the development) could potentially be extended. Research is underway which seeks to demonstrate if it is practical and viable for the Strategic Development Locations (SDLs) identified in the Joint Spatial Plan (JSP) to be developed as 'Zero Carbon.' Further evidence is being gathered to explore how far the requirement to reduce CO2 emissions by at least 20% using Renewable Energy or Low Carbon energy generation figure can be extended towards 100% (Zero Carbon) for all developments and types of site. For example, we are exploring:<br><br>a. The extension of the 'Merton Rule' Policy to include major residential Brownfield (and at what percentage);<br><br>b. The potential for increasing the requirement beyond 20% for major Greenfield residential development;<br><br>c. The extension of the Policy to cover non-domestic development over 1000sqm of floor space, and if so at what percentage;<br><br>d. The potential for SDLS to achieve 100% (zero carbon);<br><br>e. The future potential for developments to become carbon positive (i.e. over 100%). |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan E. Green - Home Builders Federation (HBF) |
| **Comment ID** | 10761601/1142 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | The HBF is supportive of the amalgamation of Policies CS1(8) - High Quality Design (Point 8 - Sustainable Construction), CS3 - Renewable & Low Carbon Energy Generation, CS4 - Renewable or Low Carbon District Heat Networks and PSP6 - On Site Renewable & Low Carbon Energy into two new Policies on Energy Management in New Development and Renewable & Low Carbon Energy Systems provided that any significant changes do not place more onerous requirements on future development. The HBF is particularly concerned about the Council's proposals for:-<br><br>o **CO2 Emissions and Renewable Energy Generation -** The Council is considering the incorporation of South Gloucestershire Climate Change Strategy targets for CO2 Emissions and Renewable Energy Generation into Planning Policy so that development proposals will be required to demonstrate how they will help to deliver the targets. It is suggested that all major development proposals (10 or more dwellings) should contribute to their maximum potential where technically feasible and viable. If so the Council should clearly set out the criteria to be satisfied in order to demonstrate Policy compliance.<br><br>o **Design Standards -** The Written Ministerial Statement (WMS) dated 25th March 2015 confirms that "*the optional new national Technical Standards should only be required through any new Local Plan Policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG.*" The Council *"should not set any additional standards or requirements relating to the construction, internal layout or performance of new dwellings"* such as higher design standards for Passivhaus. |

| | |
|---|---|
| | o **Reducing CO2 Emissions -** The HBF previously objected to Policy PSP6 and continue to object to the Council's proposals (1) to increase its CO2 emission reduction target from 20% up to 100% and (2) to extend the requirements of Policy PSP6 to the SDLs. The HBF does not support either of these proposals which deviate from the decision by the Government to set standards for energy efficiency through the national Building Regulations and to maintain this for the time being at the level of Part L 2013. The WMS published on 25th March 2015 sought to clarify the regulatory regime. At that time the Government decided to improve energy efficiency for residential buildings through Part L of the Building Regulations.<br><br>The HBF acknowledges that the Government has not enacted its proposed amendments to the Planning & Energy Act 2008 to prevent the Council from stipulating energy performance standards that exceed the Building Regulations but consider that the Council should comply with the spirit of the Government's intentions. It is the HBF's opinion that the Council should not be interfering in the Building Regulations by setting different targets or Policies outside of a national Framework. The HBF support the movement towards greater energy efficiency via a nationally consistent set of standards and a timetable for achieving any enhancements which is understood by everyone and is technically implementable. Standardisation is the key to success avoiding every Council in the country specifying its own approach to energy efficiency which would mitigate against economies of scale for both product manufacturers, suppliers and developers. There should be a single standard for the whole country to which the Council should adhere. The Government had set Part L of the Building Regulations at the 2013 level (through *Fixing the Foundations*, HM Treasury, July 2015). There is also a practical problem associated with measuring compliance with the Council's proposal. If the Council insists on stipulating targets that are higher than current Part L by establishing a 100% CO2 emission reduction(zero carbon) target then the Council will have to define what this is and how it can be achieved.<br><br>In 2015 the Government dropped its ambition to achieve zero carbon homes by 2016 because of a failure to define a technically feasible and practical solution to move from Part L 2013 to zero carbon. All new homes are required by law to comply with Part L of the Building Regulations. As a consequence new homes built in the last Decade are far more energy efficient than the rest of the existing housing stock. The new homes to be built over the next Decade will constitute a very small percentage of the District's overall dwelling stock therefore these proposals will have minimal impact on reducing CO2 emissions or improving energy efficiency across South Gloucestershire. However such targets may have a much greater negative impact on the ability for new development to contribute to other Policy requirements such as Affordable Housing provision and infrastructure including Public Transport. It is the HBF's opinion that the improvement of Public Transport connections through Section 106 Payments and/or Community Infrastructure Levy (CIL) would have a far more beneficial effect on reducing CO2 emissions than the negligible gains to be attained by exceeding the current Part L Building Regulations.<br><br>o **Heat Networks & Energy Systems -** The Council should not require developments to connect or be ready to connect to a specified district Heat Network thereby limiting future consumer choice to that particular provider of heat. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Emma Powell - Redrow Homes Limited |
| **Comment ID** | 19737921/1163 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | Part 3 - Policy Discussion Points:<br><br>Section 3 of the Local Plan Consultation sets out the titles of proposed Strategic Polices that will be included in the next version of the Local Plan. As such we do not have any Comments on the titles, but reserve our position to Comment on the detailed wording at the next Consultation. All Policies will need to be prepared in the context of the emerging NPPF, a final version is expected to published in the next few Months. The Strategic Policies will also need to reflect any changes to the West of England JSP as it progresses through the Examination towards adoption anticipated later in 2019.<br><br>**Question 16:**<br><br>**M. Energy Management in New Development; and Renewable and Low Carbon Energy Systems**<br><br>**What are your views on our intended approach and the Questions in Italics under Points 1 – 8 above?**<br><br>It is noted that the current Planning Policies that are in place are:<br><br>CS1(8) - High Quality Design (Point 8 - Sustainable Construction)<br><br>CS3 - Renewable and Low Carbon Energy Generation<br><br>CS4 - Renewable or Low Carbon District Heat Networks<br><br>PSP6 - On Site Renewable and Low Carbon Energy<br><br>And that the Council propose that the four Policies set out in the Core Strategy and PSP Plan will be replaced by two Policies in the new Local Plan, which will cover:<br><br>♦ Energy Management in new development; and |

| | |
|---|---|
| | ♦ Renewable and Low Carbon Energy Systems<br><br>It is noted that the new Policies will cover the same issues that are covered by the four current Policies, but the wording will be rationalised and refined. In addition, the Policies may be expanded to address other key issues that are currently being explored.<br><br>We reserve our position to Comment on the revised Policies, but they should be prepared so that they are consistent with Government Guidance in the NPPF, NPPG and Written Ministerial Statement and Policies should not mean that development is subject to such a scale of obligations and Policy burdens that viability is threatened. |
| **Attached documents** | Redrow Homes Limited (Emma Powell) - Pegasus Group (Mrs. Sarah Hamilton-Foyn).pdf (34.1 MB) |

| | |
|---|---|
| **Respondent Name** | Bovis Homes Limited |
| **Comment ID** | 20044801/1207 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | Please refer to enclosed letter. |
| **Attached documents** | Bovis Homes Limited - Rapleys LLP (Mr. Tony Clements).pdf (259 KB) |

| | |
|---|---|
| **Respondent Name** | IM Land Ltd and The Davison Family |
| **Comment ID** | 19925889/1295 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | Please see enclosed Representations Report on behalf of IM Land Ltd and The Davison Family prepared by Peter Brett Associates dated 30th April 2018. |
| **Attached documents** | IM Land Ltd and The Davison Family - Peter Brett Associates (Mr. Colin Danks).pdf (673 KB) |

| | |
|---|---|
| **Respondent Name** | Bloor Homes South West |
| **Comment ID** | 20096097/1311 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | Bloor Homes' Response to this issue and this Question is set out in a separate Report prepared by Briary Energy which is appended to this letter. |
| **Attached documents** | Consultation Report Vs 2.pdf (453 KB) |

| | |
|---|---|
| **Respondent Name** | Adrian Edmonds |
| **Comment ID** | 19926305/1345 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **Energy Management in New Development; and Renewable and Low Carbon Energy Systems:**<br><br>I agree that issues related to Climate Change and the mitigation of its impacts should be addressed through the Planning System. All reasonable opportunities should be taken to reduce South Gloucestershire's carbon footprint and reduce its vulnerability to changes in our climate and to extreme weather events. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Daniel Kelly - South Gloucestershire Liberal Democrat Council Group |
| **Comment ID** | 10311137/1447 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | Under Point 1 - We do not agree with the threshold of 10 or more dwellings. We believe that all developments of whatever size should demonstrate how they will contribute to $CO_2$ targets, in line with the scale of the development. Criteria should include investigating the viability for Solar Panels and other means of Renewable Energy production.<br><br>Under Point 4b – We believe that the requirement should be extended beyond 20%.<br><br>Under Point 4e – Yes, we believe the Plan should have a programme to consider this. |

| | |
|---|---|
| | Under Point 5 – We would support reducing the floor space threshold to 1,000sq ft.<br><br>We believe that the current Policy on smaller developments connecting to heat networks should remain unchanged.<br><br>Under Point 6 – We would strongly support this Policy to help meet the Council's Climate Change Strategy.<br><br>Under Point 7 – We agree with this proposal.<br><br>**Battery Storage:**<br><br>In addition to the above points, we believe that there should be a full Policy on Battery Storage in the Local Plan, not just a brief mention. Planning Applications are starting to come in and this is potentially a very important part of the country's future energy mix, so Planning Committees urgently need the Policies they can rely on when considering these Applications. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hannah Saunders - Dodington Parish Council |
| **Comment ID** | 19931969/1622 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **COMMENTS (*below in Bold Italics):***<br><br>**CO2 Emissions and Renewable Energy Generation:**<br><br>1. "We are considering incorporating the South Gloucestershire Climate Change Strategy targets for CO2 Emissions and Renewable Energy Generation into Planning Policy .... We are suggesting that all major development proposals (10 or more dwellings, and 1,000sqm or more of 'non-domestic' floor space) should contribute to their maximum potential where technically feasible and viable. The Policy would need to set out criteria that should be satisfied in order to demonstrate contribution to the targets."<br><br>What do you think about this approach? ***Members feel it is highly desirable.***<br><br>What criteria should be set? ***Unable to Comment without being given technical background.***<br><br>**Design Standards:**<br><br>2. Existing Policy encourages high standards of energy conservation and efficiency in the design of development, for example BREEAM 'very good.' This will be a primary indicator of good design. It is suggested that a similar approach is retained in the new Policies, but that higher standards are encouraged, for example the Passivhaus Standard and/or BREEAM 'Excellent.'<br><br>What are your views on this? ***We agree with this. The Policy should be firm enough that it does not leave developers an affordability "get-out."***<br><br>3. Overheating is an increasingly significant impact of Climate Change and other Local Authorities are exploring ways of addressing the issue through Planning Policies. We are proposing to incorporate the issue into the list of factors that are to be addressed through the design of development, for example, orientation of buildings, roof pitches, etc.<br><br>What are your views on this? ***We agree that design for Climate Change is essential.***<br><br>**Reducing CO2 Emissions:**<br><br>4. Advances in technology, building design, and also falling costs of Renewable Energy infrastructure means that the scope of the current 'Merton Rule' Policy (set out in Policy PSP6, which requires all major (10 dwellings) Greenfield residential developments to reduce CO2 emissions by at least 20% via the use of renewable and/or low Carbon energy sources on or near the development) could potentially be extended. Research is underway which seeks to demonstrate if it is practical and viable for the Strategic Development Locations (SDLs)identified in the Joint Spatial Plan (JSP) to be developed as 'Zero Carbon.' Further evidence is being gathered to explore how far the requirement to reduce CO2 emissions by at least 20% using Renewable Energy or Low Carbon energy generation figure can be extended towards 100% (Zero Carbon) for all developments and types of site. For example, we are exploring:<br><br>a. The extension of the 'Merton Rule' Policy to include major residential Brownfield (and at what percentage);<br><br>b. The potential for increasing the requirement beyond 20% for major Greenfield residential development;<br><br>c. The extension of the Policy to cover non-domestic development over 1,000sqm of floor space, and if so at what percentage;<br><br>d. The potential for SDLS to achieve 100% (zero carbon);<br><br>e. The future potential for developments to become carbon positive (i.e. over 100%). |

| | |
|---|---|
| | What are your views on this? ***We support this approach. Carbon emission reduction is a key national priority. Technologies fitted to individual dwellings such as Solar Panels and heat pumps could be major contributors to this aim.***<br><br>**Heat Networks & Energy Systems:**<br><br>5. With regard to the Policy that covers heat networks, we are considering removing the rigid density threshold criteria (50 dwellings per hectare (dph)) to make the Policy apply more flexibly, and to future proof it to take into account advances in technology and falling costs which could enable heat networks to be viable at densities below 50dph. We are also considering reducing the 10,000sqm of floor space threshold to 1,000sqm, but need to undertake some research to see whether this is feasible.<br><br>What are your views on this? ***We support the general approach, subject to the technology being viable. New criteria will need to be set, and reviewed periodically to take account of advances in technology.***<br><br>Some concern has been expressed over the current Policy which requires smaller developments to connect or be ready to connect to a District heat network if it is practical and viable. The concerns relate to tying developments into a particular provider of heat, thereby limiting consumer choice.<br><br>What are your views on this? ***Customer choice is important - monopolies need suitable regulation. To overcome the absence of such regulation, housing design must allow for alternative heating to be installed. This would also overcome the risk of a supplier just deciding that they are going to withdraw the facility - something similar happened in the 1980's in South Yate, when Avon Oils withdrew from supplying mains oil, leaving thousands of houses without Central Heating.***<br><br>6. We wish to consider the implications and where appropriate support the development of renewable and low carbon energy generation installations, District heat networks, and the move towards smarter energy systems including distribution and storage.<br><br>What are the Policy implications and other technologies that are coming forward which should be taken into consideration? ***This is a large-scale question that needs to be discussed with energy distributors, because local generation connections can have a major impact on electricity distribution networks.***<br><br>7. We have commissioned a study jointly with Bristol City Council to look at the delivery of a Strategic Heat Network to serve both Bristol and South Gloucestershire. Evidence is emerging and the Study is due to report in 2018. The Study will include the identification of the land that is needed for essential heat network infrastructure. It is our intention to safeguard the land identified through the new Local Plan as this will elp to deliver the heat networks and associated infrastructure.<br><br>What are your views on this? ***We need more information about the Study to be able to Comment in detail, but we are sympathetic to the idea in principle. We would like to find out more about the technology and the potential impact on the landscape.***<br><br>**Geothermal Energy:**<br><br>8. There is Geothermal Energy potential in South Gloucestershire, for example, at Coalpit Heath (SDL), where there is minewater (that is at a temperature of 14 degrees C) which could be extracted from a well, heated up (using electric power) and then pumped to heat residential development. There are potential funding sources available to undertake a Feasibility Study.<br><br>Is this an opportunity that we should explore further? ***We would support such a Study. However we are surprised that technology such as heat pumps has not been mentioned on an individual dwelling scale.*** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | E. H. Schubert Will Trust |
| **Comment ID** | 12403425/1688 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | *CO2 Emissions and Renewable Energy Generation:*<br><br>We consider that any targets in respect of CO2 emissions and Renewable Energy generation must be flexible in their application. Developments where it is not viable to install such measures (such as smaller developments, or those with specific technical issues) should not be required to meet the requirements if evidence as to why can be provided.<br><br>*Design Standards:*<br><br>Design Standards such as BREEAM and Passivhaus should be applied flexibly and have consideration to site specific considerations, rather than just a blanket, or rigid approach.<br><br>Policies relating to designing buildings to reduce overheating would be welcomed, where feasible.<br><br>*Reducing CO2 Emissions:*<br><br>Similarly to the above Responses, we consider that any targets on reductions in CO2 emissions must be applied flexibly and have regard to site specific technical and viability issues.<br><br>*Heat Networks:* |

| | |
|---|---|
| | We consider that the provision of new Heat Networks is only realistic for very large developments (over 500 homes). Smaller developments should only be required to connect to existing networks if there is a network in very close proximity which can be viably connected to. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Frampton Cotterell Parish Council |
| **Comment ID** | 20175105/1700 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | Frampton Cotterell Parish Council believes that there needs to be strong Policies on battery storage to eliminate electricity wastage. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | G. E. Forward |
| **Comment ID** | 20176577/1724 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | No Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Bloor Homes |
| **Comment ID** | 17351489/1742 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **Energy Management in New Development:**<br><br>5.7 The South Gloucestershire Policies, Sites and Places Plan currently requires major Greenfield housing developments to reduce CO2 emissions by at least 20% via the use of renewable and/or low carbon energy sources on or near the development. This is an ambitious Policy that was only adopted 5 Months ago. Now the Council is considering the requirement for all of its SDLs to achieve 100% zero carbon. Bloor Homes object to this and consider this to be a significant jump from the current position which developers are currently adjusting to. This could have significant implications for viability when coupled with the Affordable Housing requirements and other Planning obligations and CIL Payments that SDLs will be liable for.<br><br>5.8 The current NPPF Consultation Proposals (March 2018) state clearly at the top of Page 22:<br><br>**"Paragraph 149b [of the NPPF Draft Text for Consultation] reflects that Local Planning Authorities are tied to national Technical Standards, and there is limited scope to extend local ambition."**<br><br>5.9 South Gloucestershire is proposing to go well beyond any centralised standards to require zero carbon SDLs and this is not considered to be viable, would be inconsistent with national Policy and would be unsound.<br><br>6.13 Bloor Homes also object to a zero carbon Policy (Policy M) for the SDLs. Bloor Homes object to the significant jump from the current position (carbon emissions reduced by 20%) which developers are currently adjusting to. This could have significant implications for viability when coupled with the Affordable Housing requirements and other Planning obligations and CIL Payments that SDLs will be liable for. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David Jonathan Redgewell - South West Transport Network, TSSA, Railfuture, Bu... |
| **Comment ID** | 20209665/1920 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | The Study with Bristol City Council on a Strategic Heat Network is welcomed but the Network will only function in Greater Bristol built up area.<br><br>I can see the system being piped up the A38 to THORNBURY or Falfield or Chipping Sodbury, Badminton, or Marshfield.<br><br>The Council is failing to address rural inclusion in this Policy.<br><br>A38 Village have only Just received Gas Supplies from British Gas Networks.<br><br>Please explain your Rural Smart Energy Policy. |

| | |
|---|---|
| | We Would Welcome More Wind Turbines in South Gloucestershire and Geothermal Energy at Coalpit Heath. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Bloor Homes (South West) |
| **Comment ID** | 20211105/1954 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | Please find attached Representation. |
| **Attached documents** | Appendix 1 - Part 5.pdf (6.4 MB)<br>Local Plan 2018-36 - Coalpit Heath.pdf (205 KB)<br>Appendix 1 - Part 4.pdf (6.0 MB)<br>Appendix 1 - Part 2.pdf (6.7 MB)<br>Appendix 1 - Part 1.pdf (11.3 MB)<br>Appendix 1 - Part 6.pdf (17.4 MB)<br>Appendix 2.pdf (453 KB)<br>Appendix 1 - Part 3.pdf (7.3 MB) |

| | |
|---|---|
| **Respondent Name** | Douglas Homes |
| **Comment ID** | 20120033/2014 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | Similarly, although it is agreed that the improvement of energy efficiency of buildings should be encouraged, this is also covered by Building Regulations (Part L) and should not be repeated, or made more onerous, by Planning Policy.<br><br>I trust the above Comments will be taken into account in drafting the next stage of the Local Plan. If you have any questions regarding the above, or wish to discuss, please do not hesitate to contact me. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sebastian Loyn - YTL Developments (UK) Limited |
| **Comment ID** | 19779841/2082 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | M: Energy Management:<br><br>It is difficult to be precise as to what contribution the Airfield can make. However, some expert input would be useful as a means of helping SGC with its deliberations. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alex Atkinson - Edward Ware Homes (Land East of Coalpit Heath) |
| **Comment ID** | 20247169/2112 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Edward Ware Homes (Mr. Alex Atkinson) - Pegasus Group (Mr. Daniel Weaver).pdf (57.6 MB) |

| | |
|---|---|
| **Respondent Name** | Colin Gardner - TRAPP'D |
| **Comment ID** | 19845537/2135 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **5. The Plan will undermine critical Climate Change commitments:**<br><br>The Council has an obligation to meet specified CO2 reduction commitments which it will fail to meet if it pursues the proposed Spatial Strategy.<br><br>The South Gloucestershire Annual Monitoring Report (AMR) specifies a 35% CO2 reduction target by 2020 (from a 1990 base) and a 50% reduction by 2025 and 80% by 2050. The 2017 AMR also shows progress to 2015 towards meeting that target:<br><br>Please see the attached Document for the missing information. |

| | |
|---|---|
| | This shows a steady improvement in CO2 levels from Industry and Commerce and from Domestic sources, but a flat performance from transport. This means that transport is becoming increasingly important in the mix:<br><br>Please see the attached Document for the missing information.<br><br>If we simply project forward current trends to 2025 we will see Transport based emissions approaching 50% of the total CO2 generated:<br><br>Please see the attached Document for the missing information.<br><br>Therefore, without tackling a reduction in CO2 from transport it can be demonstrated that it will be impossible to meet the specified overall target reductions. Returning to those targets, a 35% reduction by 2020 would mean reducing the overall levels of CO2 to 816kt, and if transport remained flat (despite rising population) then the non-transport elements would have to deliver a 52% reduction. Extending that argument to 2025 and 2050 for the respective targets in those years would require impossible reductions in non-transport levels of CO2 of 74% and 118% respectively:<br><br>Please see the attached Document for the missing information.<br><br>What this analysis demonstrates is that South Gloucestershire has a duty to reduce transport-based CO2 emissions, which will be a major challenge given the projected increase in population. However, by setting out a Spatial Strategy that creates a separation between where people live and where they will work it is patently obvious that they will fail to do so.<br><br>**It is therefore our assertion that South Gloucestershire is deliberately or recklessly proposing a Spatial Strategy that will illegally breach target CO2 reductions, and on these grounds alone the Plan is unsound**. |
| **Attached documents** | New Local Plan 2018.pdf (348 KB) |

| | |
|---|---|
| **Respondent Name** | Paul Davis - Persimmon Homes Severn Valley |
| **Comment ID** | 3553569/2150 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | Question 16 – Energy Management in New Development and Renewable and Low Carbon Energy Systems:<br><br>8.29 Consideration of introducing the South Gloucestershire Climate Change Strategy targets for CO2 to introduce a 100% CO2 emission target and is completely unrealistic and contrary to Government Policy, which is to control energy efficiency through the Building Regulations. A proposal for a 100% emission target would exceed the target set out in the current requirements in Part L of the Building Regulations and is contrary to the guidance set out in the Written Ministerial Statement of 25th March 2015.<br><br>8.30 It is important that a nationally consistent approach is taken to Energy Standards and that improvements on changes to the Standards are implemented through a realistic timetable and assessed and measured against achievable Standards. There is currently no practical way to achieve a zero Carbon standard, which was recognised by the Government in postponing its own timetable. Until a solution is found to the imposition of a 100% Carbon Reduction Standard the Council's proposed approach will only act as a brake on development and fail to deliver necessary housing.<br><br>8.31 In addition we have the following Comments:<br><br>1. Whilst it is right to include technical and viability tests any Policies should not then be expressed as a requirement.<br><br>2. It will have a substantial impact on the ability for development to contribute to other requirements (for example Affordable Housing).<br><br>3. There is no certainty on how the Standards could be met.<br><br>4. The proposal as set out would not pass the CIL and obligations test (NPPF204) to be necessary, directly related and fairly related in scale and kind to the development.<br><br>5. The South Gloucestershire Climate Change Strategy targets exceed the target of a 50% reduction in Carbon Dioxide emissions by 2035 set out in the West of England JSP and the Joint Transport Study.<br><br>6. By accelerating the need for zero Carbon and even Carbon positive on the SDLs will threaten to delay delivery and increase costs of the allocations needed to deliver the housing requirements of the JSP and Local Plan. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Peter D. Box |
| **Comment ID** | 19453441/2153 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |

| | |
|---|---|
| **Comment** | **3. Environmental Issues:**<br><br>**3.1 Pollution:**<br><br>Like all local Councils within the UK, SG has an obligation to meet specified reductions in CO2 emissions (Green-House Gases - GHG). At present the target reductions are framed in EU Regulations but will almost certainly be transferred to UK Regulations post Brexit.<br><br>http://ec.europa.eu/environment/air/quality/standards.htm<br><br>Any and all increases in commuting within the County will all but guarantee that these targets will not be met. It should be borne in mind that housing schemes have been rejected on the grounds of predicted increases in air pollution.<br><br>https://www.airqualitynews.com/2015/07/03/plan-for-97-sussex-homes-rejected-on-air-quality-grounds/<br><br>https://www.airqualitynews.com/2017/11/14/planning-decision-upheld-after-air-quality-ruling/<br><br>Pollution is not confined to the atmosphere: soil and water courses are also polluted within metres of even minor roads. Nitrogen Dioxide (NO2), common in diesel exhaust, is particularly toxic as with water, it produces Nitric Acid. Other relevant forms of pollution include noise and the detritus which seems to accumulate in roadside verges and hedgerows: various forms of plastic are of particular concern because of their durability.<br><br>An effective way of controlling pollution is therefore to reduce commuting by locating housing developments as close as possible to places of employment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Baylis Estates Ltd |
| **Comment ID** | 19740609/2160 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | M. Energy Management in New Development; and Renewable and Low Carbon Energy Systems<br><br>This discussion point seeks to include non-domestic development over 1,000 sqm in the Council's current percentage emission reduction in CO2 target advising at Paragraph 4 that further work is being carried out to explore the extension of the Council's current Policy and to determine the appropriate percentage for non-domestic developments. Baylis Estates Ltd are committed to Climate Change adaptation which forms an integral part of their developments, however, the proposal to increase the target 100% for all developments is concerning and we would urge the Council to provide the Evidence Base to demonstrate that this is a realistic and viable target as soon as possible.<br><br>The Policy should adopt a flexible approach which seeks to balance 'fabric first' adaptation with the introduction of sensible Renewable Energy solutions which are appropriate to the site and its context. The approach should indeed seek to encourage maximum fabric efficiency as a priority before any other options for CO2 emission savings are explored.<br><br>I hope that the Comments set out above will be duly considered and will assist in informing the next iteration of the Local Plan Document. Please do not hesitate to contact me on should you wish to discuss the content of this letter in further detail. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | CEG and The Charfield Landowners Consortium |
| **Comment ID** | 16664993/2223 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **M: Energy Management in New Development; and Renewable and Low Carbon Energy Systems:**<br><br>Point 4 under this part of the Document suggests that the current requirements to achieve a 20% reduction in CO2 emissions via use of on-site renewables and/or low Carbon energy sources could be extended towards 100% (i.e. Zero Carbon). It suggests that research is underway to determine if it is 'practical and viable' for the SDLs to be developed as Zero Carbon in this manner.<br><br>Our Client supports measures to encourage and support sustainable construction and design. However, if a 100% reduction in CO2 emissions is sought, this would be an ambitious Policy and set a very high level of design expectation for new development. Whilst our Client supports the move towards greater energy efficiency, we object to this proposal because its requirements go significantly beyond the Energy Performance Standards set by Part L of Building Regulations. It is also contrary to the Government's stated intention to establish improved standards for energy efficiency through amendments to the Planning & Energy Act 2008. Whilst amendments to statute have not yet been enacted, the Government's clear view is that Councils should not introduce Energy Performance Standards that exceed Building Regulations.<br><br>It is critical also that any such Policy acknowledges physical and environmental constraints on sites which may limit the scope to which a |

| | |
|---|---|
| | 100%Carbon reduction can be met. There must be flexibility to deal with design and sites on a case by case basis without putting additional pressure on the viability of new development.<br><br>With such an ambitious target, this is clearly likely to be a difficult balance when dealing with constrained, historic and contaminated sites, and an inflexible approach is likely to hinder development coming forward. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Amanda Scott |
| **Comment ID** | 20374561/2296 |
| **Document Part Name** | Question 16 - Energy Management in New Development; and Renewable and Low Carbon Energy Systems |
| **Comment** | **Energy Management in New Development; and Renewable and Low Carbon Energy Systems:**<br><br>I agree that issues related to Climate Change and the mitigation of its impacts should be addressed through the Planning System. All reasonable opportunities should be taken to reduce South Gloucestershire's Carbon footprint and reduce its vulnerability to changes in our climate and to extreme weather events. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Jodie Bailey - Pucklechurch Parish Council |
| **Comment ID** | 1061057/102 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | Please see attached Comment. |
| **Attached documents** | Q17 Gypsy Traveller comment.docx (13 KB) |

| | |
|---|---|
| **Respondent Name** | Anne Gale |
| **Comment ID** | 16344321/133 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | Provide sites, yes BUT when they camp illegally, deal with it promptly rather than ignoring the local residents. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mr. Wilson |
| **Comment ID** | 14406177/135 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | **Additional Text Sought:**<br><br>This Policy and that of site Intensification do not apply to those Gypsy/Traveller Sites that have been previously Approved solely on the basis of very special circumstances specific to a case and in which the permit is conditional on the site being returned to its original state if the Applicant and his/her resident dependants cease to occupy the site or are no longer classed as a gypsy/traveller. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Thompson |
| **Comment ID** | 17795873/171 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | Unable to Comment until proposed sites are identified. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christopher Tippetts |
| **Comment ID** | 19452065/180 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | Gypsy Traveller Sites should not be allocated using Green Belt Land. I have witnessed many times the total lack of regard shown by Travellers towards the upkeep of Green Belt land they decide to take over illegally. Brownfield sites should be used for official Traveller Sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Carolyn Baker |
| **Comment ID** | 17252193/214 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | Traveller Sites should not be approved in a situation when any other resident applying for the same, would be refused. All too often Green Belt land is built on by Travellers when anyone else would be refused Planning, it should be a level playing field for everyone regardless of ethnicity. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Helen Johnstone - Stroud District Council |
| **Comment ID** | 14317537/264 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | See Comments at Q. 18 below.<br><br>1. The Council observes that the Government has just announced a review of Gypsy and Traveller matters including definition, stronger enforcement and site provision (20.04.18). This will need to be taken into account in formulating an appropriate Policy response to Gypsy and Traveller matters.<br>2. Whilst it is welcomed that, all existing and authorised Gypsy/Traveller sites within South Gloucestershire are proposed to be allocated in the new Local Plan as a permanent site for Gypsy/Traveller use this does not appear to meet the current overall shortfall nor achieve a 5 years' supply of sites. It is therefore important that the Plan sets out how the current and future needs of travelling communities will be met.<br>3. It is noted that the need for Travelling Showpeople sites is not considered to be at a level that the Council could demonstrate a case for exceptional circumstances, required to justify removing the Green Belt designation ("insetting") and allocating for this use. Yet the need for new Travelling Showpeople plots in South Gloucestershire is 24 for the period 2017 - 2032 i.e. there remains inadequate deliverable supply annually or in five year periods starting last year. It is important that Local Plans set out how current and future needs will be met. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Claire Young |
| **Comment ID** | 916289/351 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | Providing small managed stopping places rather than large scale transit sites would benefit both people from the Gypsy and Travelling communities, who would have somewhere to stop as a family group, and the settled community, who would avoid the disruption of unlawful encampments in inappropriate locations.<br><br>Safeguarding and intensifying existing permanent sites reduces the need for new areas of Green Belt land to be developed, however the concerns about "insetting" raised in the 2014 PSP Consultation still remain. If it is possible to safeguard Travelling Show People sites without removing them from the Green Belt, could this same approach be taken with the Gypsy and Traveller sites? Bearing in mind that if the sites were no longer required, this Document says consideration would be given to returning them to the Green Belt, what is the benefit of removing the designation in the first place? |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David White |
| **Comment ID** | 5522945/367 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | All pointless unless you have a stronger Enforcement action to follow through. At present Planning restrictions on one site have been ignored and contravened since 2001 with no adequate Enforcement action. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Simmons - Westerleigh Parish Council |
| **Comment ID** | 17221409/416 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | **17N Gypsy and Traveller Accommodation:**<br><br>**Do you have any views on our intended approach to Gypsy and Traveller Accommodation?**<br><br>**WPC agrees with the Policy and in particular utilising existing sites where possible.**<br><br>**Not allowing permanent building is also important.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alveston, Rudgeway, and Earthcott Parish Council |
| **Comment ID** | 19784545/448 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | **Support the need to provide pitches etc in line with Policy. And ensure where illegal encampments occur people move on swiftly. Council should protect its assets from risk of encroachment.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Donna Ford - Iron Acton Parish Council |
| **Comment ID** | 1060385/470 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | **Gypsy and Traveller Accommodation:**<br><br>South Gloucestershire Council is required by National Planning Policy to identify and update annually, a supply of specific sites for Gypsies and Travellers sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against locally assessed need. Consistent with its response to Question 4 above, Iron Acton Parish Council supports the approach proposed in the Local Plan Prospectus to ensuring that provision of sites for our Gypsy and Traveller Community meets assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christine Hunter |
| **Comment ID** | 19809025/495 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | **Gypsy and Traveller Accommodation:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Gypsies and Travellers sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against locally assessed need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for our Gypsy and Traveller Community in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alan Jones - Hanham District Green Belt Conservation Society |
| **Comment ID** | 17236353/543 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | From review SGC posted information, 66% are not travellers, so is there a duty to accommodate these people on these sites?<br><br>Cannot understand why SGC has to 'share' load with adjacent Authorities. |
| **Attached documents** | Hanham District Green Belt Conservation Society (Alan Jones).pdf (20.3 MB) |

| | |
|---|---|
| **Respondent Name** | Paul Chapman - Iron Acton Parish Council |
| **Comment ID** | 19809537/561 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | **Gypsy and Traveller Accommodation:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Gypsies and Travellers sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for our Gypsy and Traveller Community in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David Hatherell |
| **Comment ID** | 19830849/576 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | **Gypsy and Traveller Accommodation:** |

| | |
|---|---|
| | South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Gypsies and Travellers sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for our Gypsy and Traveller Community in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | John O'Donnell |
| **Comment ID** | 18604385/587 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | **Gypsy and Traveller Accommodation:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Gypsies and Travellers sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for our Gypsy and Traveller Community in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Joseph Hatherell |
| **Comment ID** | 19831681/598 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | **Gypsy and Traveller Accommodation:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Gypsies and Travellers sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for our Gypsy and Traveller Community in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Jane Driver |
| **Comment ID** | 5134785/631 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | **Gypsy and Traveller Accommodation:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Gypsies and Travellers sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for our Gypsy and Traveller Community in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Diana Porter-Smith |
| **Comment ID** | 10874433/642 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | **Gypsy and Traveller Accommodation:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Gypsies and Travellers sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for our Gypsy and Traveller Community in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Michael Keenan |
| **Comment ID** | 2796353/654 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | **Gypsy and Traveller Accommodation:** |

| | |
|---|---|
| | South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Gypsies and Travellers sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for our Gypsy and Traveller Community in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Richard Hunter |
| **Comment ID** | 12513441/669 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | **Gypsy and Traveller Accommodation:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Gypsies and Travellers sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for our Gypsy and Traveller Community in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Zoe Hancock - Bristol Avon Catchment Partnership |
| **Comment ID** | 19832225/692 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | No additional Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Rosemary White |
| **Comment ID** | 10707009/703 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | Gypsy and Traveller Accommodation:<br><br>South Gloucestershire Council is required by national Planning policy to identify and update annually, a supply of specific sites for Gypsies and Travellers sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for our Gypsy and Traveller Community in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Purchase |
| **Comment ID** | 2804385/714 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | **Gypsy and Traveller Accommodation:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Gypsies and Travellers sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for our Gypsy and Traveller Community in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Suzanna Keenan |
| **Comment ID** | 17805057/757 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | **Gypsy and Traveller Accommodation:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Gypsies and Travellers sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed |

| | |
|---|---|
| | Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for our Gypsy and Traveller Community in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Simon Whittard |
| **Comment ID** | 12489153/769 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | **Gypsy and Traveller Accommodation:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Gypsies and Travellers sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for our Gypsy and Traveller Community in line with assessed need.<br><br>However, I feel that the provision of sites already agreed, have over compensated for the requirement, and more consideration should be given to existing householders who do not want more travellers' sites near their homes, and the proven increase in local reported crime instigated by some of the travelling community. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Heather Elgar - West of England Nature Partnership |
| **Comment ID** | 19839553/804 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | Please find below Comments from the West of England Nature Partnership (WENP) in response to the South Gloucestershire Local Plan Consultation.<br><br>For transparency, please know that Dominic Mellon (Consultant in Public Health for South Gloucestershire Council) sits on the WENP Board and thus note a declared conflict of interests. This Response reflects the aims and objectives of the Partnership and does not reflect views of individual Board members.<br><br>Question 17: Gypsy and Traveller Accommodation:<br><br>No Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Robert and Diana Pardoe |
| **Comment ID** | 10784545/816 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | **Gypsy and Traveller Accommodation:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Gypsies and Travellers sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for our Gypsy and Traveller Community in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Brian Hackland |
| **Comment ID** | 8354337/833 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | **Gypsy and Traveller Accommodation:**<br><br>Concerns about unauthorised Gypsy and Traveller encampments are a perennial target for reports in the local and national media. The answer is simple and is set out clearly in national Planning Policy – adequate provision of authorised sites to meet this community's housing needs. South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Gypsies and Travellers sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that authorised sites are available for our Gypsy and Traveller Community |

| | |
|---|---|
| | in line with assessed need, thus reducing the resort of unauthorised encampments and the concern these cause in local non-Gypsy and Traveller communities. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anna Webster |
| **Comment ID** | 19843617/844 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | **Gypsy and Traveller Accommodation:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Gypsies and Travellers sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for our Gypsy and Traveller Community in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Victoria & John Vlietstra |
| **Comment ID** | 19843937/855 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | **Gypsy and Traveller Accommodation:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Gypsies and Travellers sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for our Gypsy and Traveller Community in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christina Fussell |
| **Comment ID** | 19843969/866 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | **Gypsy and Traveller Accommodation:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Gypsies and Travellers sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for our Gypsy and Traveller Community in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Paul Fussell |
| **Comment ID** | 19844001/877 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | **Gypsy and Traveller Accommodation:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Gypsies and Travellers sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for our Gypsy and Traveller Community in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Oliver Fussell |
| **Comment ID** | 10784449/889 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | **Gypsy and Traveller Accommodation:** |

| | |
|---|---|
| | South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Gypsies and Travellers sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for our Gypsy and Traveller Community in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tom Barnes |
| **Comment ID** | 19844673/900 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | **Gypsy and Traveller Accommodation:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Gypsies and Travellers sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for our Gypsy and Traveller Community in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Peter Barker - Latteridge Road Community Group |
| **Comment ID** | 6622945/945 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | **Gypsy and Traveller Accommodation:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Gypsies and Travellers sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for our Gypsy and Traveller Community in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anne L. Heyes |
| **Comment ID** | 14400193/958 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | Dear Sir/Madam,<br><br>In the above Document you set out the intention of intensifying existing Gypsy/Traveller Sites, making permanent current sites and dropping the Green Belt designation.<br><br>I think this is a dangerous and ill thought out Policy. If you are to pursue this line, then the matter requires more thought and certain caveats need to be applied.<br><br>In particular, where a site in the Green Belt has been given temporary permission for the use of Gypsy/Travellers, or permission specific to the current inhabitants, then this permanent status should by no account be given permanent status.<br><br>Additional Comments sent to us on 9th April 2018 as per the below:<br><br>I have just submitted this letter. I now see that the final paragraph is incorrect; please amend to:<br><br>In particular, where a site in the Green Belt has been given temporary permission for the use of Gypsy/Travellers, or permission specific to the current inhabitants, then these sites should on no account be automatically granted permanent status.<br><br>Thank you. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David and Tracey Jones |
| **Comment ID** | 19883585/976 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |

| | |
|---|---|
| **Comment** | **Gypsy and Traveller Accommodation:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Gypsies and Travellers sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for our Gypsy and Traveller Community in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Cate Davidson - Sodbury Town Council |
| **Comment ID** | 4877793/1024 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | Dear Planning Team,<br><br>Sodbury Town Council responds as follows to the Local Plan (non strategic) Consultation:<br><br>Q. 17 STC feels consideration needs to be given on a site by site Policy rather than a blanket approach.<br><br>Please note the Comments as appropriate. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan E. Green - Home Builders Federation (HBF) |
| **Comment ID** | 10761601/1143 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | Generally the HBF is supportive of the Council's intended approach with the exception of the proposal to provide additional pitches on the SDLs. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Emma Powell - Redrow Homes Limited |
| **Comment ID** | 19737921/1164 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | Part 3 - Policy Discussion Points:<br><br>Section 3 of the Local Plan Consultation sets out the titles of proposed Strategic Polices that will be included in the next version of the Local Plan. As such we do not have any Comments on the titles, but reserve our position to Comment on the detailed wording at the next Consultation. All Policies will need to be prepared in the context of the emerging NPPF, a final version is expected to published in the next few Months. The Strategic Policies will also need to reflect any changes to the West of England JSP as it progresses through the Examination towards adoption anticipated later in 2019.<br><br>**Question 17:**<br><br>**N. Gypsy and Traveller Accommodation**<br><br>**Do you have any views on our intended approach to Gypsy and Traveller accommodation?**<br><br>No Comments. |
| **Attached documents** | Redrow Homes Limited (Emma Powell) - Pegasus Group (Mrs. Sarah Hamilton-Foyn).pdf (34.1 MB) |

| | |
|---|---|
| **Respondent Name** | Richard Bull - Environment Agency |
| **Comment ID** | 11527745/1259 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | N. Gypsy and Traveller Accommodation: |

| | |
|---|---|
| | Flood Risk mitigation will need to be considered for expansion and intensification on existing gypsy traveller sites. The identification of potential new sites must be in accordance with the Sequential Test and directed to areas in Flood Zone 1, where available.<br><br>Any proposed use of non-mains foul drainage and the potential to impact on the water environment must be carefully assessed, prior to any approval. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Gill Penberth - Tormarton Parish Council |
| **Comment ID** | 19943937/1288 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | **N. Gypsy and Traveller Accommodation – PP 96 - 99:**<br><br>In a recent Planning Decision (PK17/2008/F) the Local Planning Authority permitted a Gypsy/Traveller Site with the Conditions that only the Applicant, his wife and their resident dependants occupied the site and that they continued to be defined as gypsies or travellers. The Conditions also stipulated that no more than two caravans are stationed on the site at one time and that the site should be restored to its former state (an agricultural field) if the above named persons ceased to occupy the site.<br><br>The proposed wording in the Local Plan Paragraphs headed *Permanent Allocation of Existing Sites* and *Intensification* contradict the Conditions stipulated in the above Planning Decision and this contradiction needs to be addressed by inserting the following paragraph or similar into the text of this Section of the Local Plan:-<br><br>*The Policies concerning Permanent Allocation of Existing Sites and Intensification do not apply to those gypsy/traveller sites that have been previously Approved solely on the basis of very special circumstances specific to a case and in which the permit is conditional on the site being returned to its original state if the Applicant and his/her resident dependants cease to occupy the site or are no longer classed as a gypsy/traveller.* |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Bloor Homes South West |
| **Comment ID** | 20096097/1312 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | It is suggested that in the period 6 - 10 and 11 - 15 years the Council will investigate how additional sites for Gypsy/Traveller provision could be made through the delivery of the Strategic Development Locations; when looking at this approach the Council will need to take a robust approach to identify the genuine availability of land for this purpose, and any impact on overall scheme viability which may impact on the delivery of development at the Strategic Development Locations.<br><br>We hope that this Response is of use and look forward to participating in the latter stages of the Plan preparation. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Adrian Edmonds |
| **Comment ID** | 19926305/1346 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | **Gypsy and Traveller Accommodation:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Gypsies and Travellers sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for our Gypsy and Traveller Community in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sue Hope |
| **Comment ID** | 411169/1520 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | Providing small managed stopping places rather than large scale transit sites would benefit both people from the gypsy and travelling communities, who would have somewhere to stop as a family group, and the settled community, who would avoid the disruption of unlawful encampments in inappropriate locations.<br><br>Safeguarding and intensifying existing permanent sites reduces the need for new areas of Green Belt land to be developed, however the concerns about “insetting” raised in the 2014 PSP Consultation still remain. If it is possible to safeguard Travelling Show People sites without removing them from the Green Belt, could this same approach be taken with the Gypsy and Traveller sites? Bearing in mind that if the sites were no longer |

| | |
|---|---|
| | required, this Document says consideration would be given to returning them to the Green Belt, what is the benefit of removing the designation in the first place? |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hannah Saunders - Dodington Parish Council |
| **Comment ID** | 19931969/1623 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | **COMMENTS:**<br><br>Members feel that Transit Provision/Temporary Stopping Places are required and essential, this would help the situation when unauthorised encampments are set up.<br><br>Agree that those sites that are currently safeguarded become permanent sites – this approach makes sense.<br><br>The intensification of these sites – to accommodate more pitches is a good approach – but how do the existing Gypsy and Traveller community feel about this…. this matter would have to be handled very carefully. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | E. H. Schubert Will Trust |
| **Comment ID** | 12403425/1689 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | No Comments at this time. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Frampton Cotterell Parish Council |
| **Comment ID** | 20175105/1701 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | Frampton Cotterell Parish Council is in favour providing there is a size limit to the sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | G. E. Forward |
| **Comment ID** | 20176577/1725 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | If a site were to be provided in our area, and I question why, as they are not travelling, I hope it would be better monitored and managed than the appalling site at Almondsbury by the side of the M4. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Fiona Thornton - Badminton Parish Council |
| **Comment ID** | 19696993/1747 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | **Page 98 of Draft Local Plan:**<br><br>The Local Plan proposes that all existing gypsy/traveller sites in South Glos should be made permanent. Badminton Parish Council considered this matter at their recent meeting on Thursday 10th May, and the Parish Councillors voted unanimously to ask that the following text is added to the Local Plan:-<br><br>This Policy and that of site Intensification do not apply to those gypsy/traveller sites that have been previously Approved solely on the basis of very special circumstances specific to a case and in which the permit is conditional on the site being returned to its original state if the Applicant and his/her resident dependants cease to occupy the site or are no longer classed as a gypsy/traveller.<br><br>Badminton Parish Council is aware of a Conditional Planning Consent granted for a gypsy/traveller site in Norley Lane, Tormarton (PK17/2008/F) which included in Condition No. 3 that the gypsy/traveller site could continue provided it was occupied by the occupant, his wife and their resident dependants and that they are gypsy/travellers. If this Condition no longer applies, the site has to be returned to its original condition i.e. an agricultural field. |

| | |
|---|---|
| | Badminton Parish Council feels strongly that the Conditions imposed when the Planning Consent was granted should remain in force, and should not be overridden by the proposed new provision in the Draft Local Plan.<br><br>**We appreciate that, strictly speaking, the Consultation period has ended. Last week's meeting was the first opportunity the Parish Council had to consider this matter, and we would be grateful if our Response could be considered.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hydrock Consultants Ltd and Mojo Active Ltd |
| **Comment ID** | 19740577/1793 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | N. Gypsy and Traveller Accommodation (Page 96):<br><br>The Tall Trees site was designated as a Gypsy and Traveller site through the Core Strategy, however, the site is now under different ownership and it has ceased to be used by Gypsies and Travellers. The Gypsy and Traveller Accommodation Assessment (February 2018) highlights sites and yards that represent the Council's supply of Gypsy and Traveller sites. Tall Trees is not identified as a site to provide pitches and the need has been calculated based on other sites in the District.<br><br>**Recommended Amendments:**<br><br>There is no intention for the site to be managed or maintained as a gypsy and traveller site and alternative proposals are being developed for the future use of the site to make optimum use of the land. Therefore, any future Policy within the Local Plan should omit Tall Trees from the schedule of gypsy and traveller sites.<br><br>I hope that the Comments set out above will be duly considered and will assist in informing the next iteration of the Local Plan Document. Please do not hesitate to contact me on should you wish to discuss the content of this letter in further detail. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tony Albon-Crouch - Marshfield Parish Council |
| **Comment ID** | 15617697/1878 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | **Gypsy and Traveller Accommodation:**<br><br>With regard to Gypsy and Traveller Accommodation, although we are unable to offer any suitable sites within the Parish we would support proper planning and associated allocations to address this matter elsewhere. We are concerned at recent developments in the neighbouring village of Tormarton, where unauthorised development has retrospectively been given Planning Permission and the feeling of local residents is that the Planning System is not functioning as it should. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ian Beckey - TSSA, South West Transport Network, Railfuture, Bus User UK |
| **Comment ID** | 20207969/1901 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | Question 17 - Page 99.<br><br>Gypsy and Traveller Accommodation.<br><br>There is a need to address a new site in the Severn Vale area so as to add a rival Travellers site to take pressure off rural encroachment in villages such as Alveston.<br><br>With the Main site being at Patchway Bristol a need to address further Traveller sites and allocation should be address this issue.<br><br>Would also help With the camping on SISTON Common.<br><br>Traveller site needs to be close to School, village centres, shops etc. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Bloor Homes (South West) |
| **Comment ID** | 20211105/1955 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | Please find attached Representation. |
| **Attached documents** | Appendix 1 - Part 5.pdf (6.4 MB)<br>Local Plan 2018-36 - Coalpit Heath.pdf (205 KB)<br>Appendix 1 - Part 4.pdf (6.0 MB)<br>Appendix 1 - Part 2.pdf (6.7 MB)<br>Appendix 1 - Part 1.pdf (11.3 MB)<br>Appendix 1 - Part 6.pdf (17.4 MB)<br>Appendix 2.pdf (453 KB)<br>Appendix 1 - Part 3.pdf (7.3 MB) |

| | |
|---|---|
| **Respondent Name** | Sue Radford-Hancock - Acton Turville Parish Council |
| **Comment ID** | 1060353/2089 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | Mention is made of provision for Gypsy and Traveller Accommodation, but such provision could be challenged as being discriminatory towards one sector of the population and this could then result in there being a 'free-for-all' development right.<br><br>The Parish Council is conscious of the need to have provision for Travellers but we feel that there are sufficient 'Brownfield' sites within South Gloucestershire for adequate provision to be made without appropriating Green Belt land. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alex Atkinson - Edward Ware Homes (Land East of Coalpit Heath) |
| **Comment ID** | 20247169/2113 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Edward Ware Homes (Mr. Alex Atkinson) - Pegasus Group (Mr. Daniel Weaver).pdf (57.6 MB) |

| | |
|---|---|
| **Respondent Name** | Paul Davis - Persimmon Homes Severn Valley |
| **Comment ID** | 3553569/2151 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | Question 17 – Gypsy and Traveller Accommodation:<br><br>8.32 PHSV consider the provision of specific sites for gypsies and travellers should be ringfenced and we fundamentally object to the proposal to seek to provide pitches through the delivery of the SDLs, whether this is through provision on site or through financial contributions.<br><br>8.33 Government Planning Policy for traveller sites was updated in August 2015. It does not advocate gypsy sites as part of major development proposals. In the Policy Document, the Policy on Planning for Traveller Sites includes the following:<br><br>- *'Local Authorities should set pitch targets for gypsies and travellers.'*<br><br>- *'Criteria should be set to guide land supply allocations where there is an identified need.'*<br><br>- *'Where is there no identified need, Criteria-based Policies should be included to provide a basis for decisions in Case Applications nevertheless come forward.'*<br><br>8.34 Therefore the Council should update its assessment of need and land supply for gypsy and traveller sites and set out a Criteria-based Policy providing criteria for meeting provision in response to the needs of the travelling community and not prejudge the SDLs are suitable for providing sites that meet those needs. A good up-to-date example of such a Policy is contained in the recently adopted Gloucester, Cheltenham, Tewkesbury Joint Core Strategy.<br><br>8.35 In this respect we also note that further guidance contained in the DCLG August 2015 Policy Document is that Authorities should *'consider production of Joint Development Plans that set targets on a cross-boundary basis.'* We note this was not done in preparing the JSP and neither does it propose including gypsy and traveller provision within its SDL Policies. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | CEG and The Charfield Landowners Consortium |
| **Comment ID** | 16664993/2224 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |

| | |
|---|---|
| **Comment** | **N: Gypsy and Traveller Accommodation:**<br><br>The Consultation text notes that needs for Gypsy and Traveller Accommodation for the periods 6 - 10 and 11 - 15 in the Plan may require allocation of additional pitches. Any allocations must be predicated on up-to-date evidence of need. The most recent assessment was undertaken in 2013.<br><br>We would welcome any further opportunities to participate in and support the preparation of the New Local Plan as it progresses. Should you wish to discuss these Representations further please contact Tristan Dewhurst or me. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Amanda Scott |
| **Comment ID** | 20374561/2297 |
| **Document Part Name** | Question 17 - Gypsy and Traveller Accommodation |
| **Comment** | **Gypsy and Traveller Accommodation:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Gypsies and Travellers sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against locally assessed need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for our Gypsy and Traveller Community in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Thompson |
| **Comment ID** | 17795873/172 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | Unable to Comment until sites are identified. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Helen Johnstone - Stroud District Council |
| **Comment ID** | 14317537/265 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | 1. The Council observes that the Government has just announced a review of Gypsy and Traveller matters including definition, stronger enforcement and site provision (20.04.18). This will need to be taken into account in formulating an appropriate Policy response to Gypsy and Traveller matters.<br>2. Whilst it is welcomed that, all existing and authorised Gypsy/Traveller sites within South Gloucestershire are proposed to be allocated in the new Local Plan as a permanent site for Gypsy/Traveller use this does not appear to meet the current overall shortfall nor achieve a 5 years' supply of sites. It is therefore important that the Plan sets out how the current and future needs of travelling communities will be met.<br>3. It is noted that the need for Travelling Showpeople sites is not considered to be at a level that the Council could demonstrate a case for exceptional circumstances, required to justify removing the Green Belt designation ("insetting") and allocating for this use. Yet the need for new Travelling Showpeople plots in South Gloucestershire is 24 for the period 2017 - 2032 i.e. there remains inadequate deliverable supply annually or in five year periods starting last year. It is important that Local Plans set out how current and future needs will be met. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David White |
| **Comment ID** | 5522945/370 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | See above Comment which refers to Showman site. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Simmons - Westerleigh Parish Council |
| **Comment ID** | 17221409/417 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | **18O. Travelling Showpeople:**<br><br>**Do you have any views on the intended approach to Travelling Showpeople?**<br><br>**WPC agrees with the Policy.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Donna Ford - Iron Acton Parish Council |
| **Comment ID** | 1060385/471 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | **Travelling Showpeople:**<br><br>South Gloucestershire Council is required by National Planning Policy to identify and update annually, a supply of specific sites for Travelling Showpeople sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against locally assessed need. Consistent with its response to Question 4 above, Iron Acton Parish Council supports the approach proposed in the Local Plan Prospectus to ensuring that provision of sites for Travelling Showpeople meets assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christine Hunter |
| **Comment ID** | 19809025/496 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | **Travelling Showpeople:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Travelling Showpeople sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against locally assessed need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for Travelling Showpeople in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alan Jones - Hanham District Green Belt Conservation Society |
| **Comment ID** | 17236353/547 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | Similar Comments to 17 above.<br><br>(Response to Question 17:<br><br>Traveller Accommodation:<br><br>From review SGC posted information, 66% are not travellers, so is there a duty to accommodate these people on these sites?<br><br>Cannot understand why SGC has to 'share' load with adjacent Authorities.) |
| **Attached documents** | Hanham District Green Belt Conservation Society (Alan Jones).pdf (20.3 MB) |

| | |
|---|---|
| **Respondent Name** | Paul Chapman - Iron Acton Parish Council |
| **Comment ID** | 19809537/562 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | **Travelling Showpeople:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Travelling Showpeople sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for Travelling Showpeople in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David Hatherell |
| **Comment ID** | 19830849/577 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | **Travelling Showpeople:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Travelling Showpeople sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed |

| | |
|---|---|
| | Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for Travelling Showpeople in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | John O'Donnell |
| **Comment ID** | 18604385/588 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | **Travelling Showpeople:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Travelling Showpeople sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for Travelling Showpeople in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Joseph Hatherell |
| **Comment ID** | 19831681/599 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | **Travelling Showpeople:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Travelling Showpeople sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for Travelling Showpeople in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Jane Driver |
| **Comment ID** | 5134785/632 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | **Travelling Showpeople:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Travelling Showpeople sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for Travelling Showpeople in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Diana Porter-Smith |
| **Comment ID** | 10874433/643 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | **Travelling Showpeople:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Travelling Showpeople sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for Travelling Showpeople in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Michael Keenan |
| **Comment ID** | 2796353/655 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | **Travelling Showpeople:** |

| | |
|---|---|
| | South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Travelling Showpeople sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for Travelling Showpeople in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Richard Hunter |
| **Comment ID** | 12513441/670 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | **Travelling Showpeople:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Travelling Showpeople sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for Travelling Showpeople in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Zoe Hancock - Bristol Avon Catchment Partnership |
| **Comment ID** | 19832225/693 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | No additional Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Rosemary White |
| **Comment ID** | 10707009/704 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | Travelling Showpeople:<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Travelling Showpeople sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for Travelling Showpeople in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Purchase |
| **Comment ID** | 2804385/715 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | **Travelling Showpeople:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Travelling Showpeople sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for Travelling Showpeople in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Suzanna Keenan |
| **Comment ID** | 17805057/758 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | **Travelling Showpeople:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Travelling Showpeople sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for Travelling Showpeople in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Simon Whittard |
| **Comment ID** | 12489153/770 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | **Travelling Showpeople:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Travelling Showpeople sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for Travelling Showpeople in line with assessed need.<br><br>I believe that Travelling Showpeople are reducing in numbers, and therefore the current provision for local sites is adequate. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Heather Elgar - West of England Nature Partnership |
| **Comment ID** | 19839553/805 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | Please find below Comments from the West of England Nature Partnership (WENP) in response to the South Gloucestershire Local Plan Consultation.<br><br>For transparency, please know that Dominic Mellon (Consultant in Public Health for South Gloucestershire Council) sits on the WENP Board and thus note a declared conflict of interests. This Response reflects the aims and objectives of the Partnership and does not reflect views of individual Board members.<br><br>Question 18: Travelling Showpeople:<br><br>No Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Robert and Diana Pardoe |
| **Comment ID** | 10784545/817 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | **Travelling Showpeople:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Travelling Showpeople sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for Travelling Showpeople in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Brian Hackland |
| **Comment ID** | 8354337/834 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | **Travelling Showpeople:**<br><br>The same needs and arguments apply here as for the Gypsy and Traveller community. South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Travelling Showpeople sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for Travelling Showpeople in line with assessed need. This in turn will ensure that Travelling Showpeople do not feel forced to settle on unauthorised sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anna Webster |
| **Comment ID** | 19843617/845 |
| **Document Part Name** | Question 18 - Travelling Showpeople |

| | |
|---|---|
| **Comment** | **Travelling Showpeople:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Travelling Showpeople sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for Travelling Showpeople in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Victoria & John Vlietstra |
| **Comment ID** | 19843937/856 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | **Travelling Showpeople:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Travelling Showpeople sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for Travelling Showpeople in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christina Fussell |
| **Comment ID** | 19843969/867 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | **Travelling Showpeople:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Travelling Showpeople sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for Travelling Showpeople in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Paul Fussell |
| **Comment ID** | 19844001/878 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | **Travelling Showpeople:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Travelling Showpeople sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for Travelling Showpeople in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Oliver Fussell |
| **Comment ID** | 10784449/890 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | **Travelling Showpeople:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Travelling Showpeople sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for Travelling Showpeople in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tom Barnes |
| **Comment ID** | 19844673/901 |
| **Document Part Name** | Question 18 - Travelling Showpeople |

| | |
|---|---|
| **Comment** | **Travelling Showpeople:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Travelling Showpeople sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for Travelling Showpeople in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Peter Barker - Latteridge Road Community Group |
| **Comment ID** | 6622945/946 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | **Travelling Showpeople:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Travelling Showpeople sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for Travelling Showpeople in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David and Tracey Jones |
| **Comment ID** | 19883585/977 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | **Travelling Showpeople:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Travelling Showpeople sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for Travelling Showpeople in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Cate Davidson - Sodbury Town Council |
| **Comment ID** | 4877793/1025 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | Dear Planning Team,<br><br>Sodbury Town Council responds as follows to the Local Plan (non strategic) Consultation:<br><br>Q. 18 No Comment.<br><br>Please note the Comments as appropriate. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Emma Powell - Redrow Homes Limited |
| **Comment ID** | 19737921/1165 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | Part 3 - Policy Discussion Points:<br><br>Section 3 of the Local Plan Consultation sets out the titles of proposed Strategic Polices that will be included in the next version of the Local Plan. As such we do not have any Comments on the titles, but reserve our position to Comment on the detailed wording at the next Consultation. All Policies will need to be prepared in the context of the emerging NPPF, a final version is expected to published in the next few Months. The Strategic Policies will also need to reflect any changes to the West of England JSP as it progresses through the Examination towards adoption anticipated later in 2019.<br><br>**Question 18:** |

| | |
|---|---|
| | **O. Travelling Showpeople**<br><br>**Do you have any views on the intended approach to Travelling Showpeople?**<br><br>No Comments. |
| **Attached documents** | Redrow Homes Limited (Emma Powell) - Pegasus Group (Mrs. Sarah Hamilton-Foyn).pdf (34.1 MB) |

| | |
|---|---|
| **Respondent Name** | Richard Bull - Environment Agency |
| **Comment ID** | 11527745/1260 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | O. Travelling Showpeople:<br><br>See Response to N above.<br><br>Comments relating to N. are copied below:<br><br>Flood Risk mitigation will need to be considered for expansion and intensification on existing gypsy traveller sites. The identification of potential new sites must be in accordance with the Sequential Test and directed to areas in Flood Zone 1, where available.<br><br>Any proposed use of non-mains foul drainage and the potential to impact on the water environment must be carefully assessed, prior to any approval. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Adrian Edmonds |
| **Comment ID** | 19926305/1347 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | **Travelling Showpeople:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Travelling Showpeople sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against Locally Assessed Need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for Travelling Showpeople in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Daniel Kelly - South Gloucestershire Liberal Democrat Council Group |
| **Comment ID** | 10311137/1448 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | There is no mention of storage of equipment in this Policy, which is a significant issue that needs to be taken into account. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hannah Saunders - Dodington Parish Council |
| **Comment ID** | 19931969/1624 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | **COMMENTS:**<br><br>Members feel that Travelling Showpeople are a long standing and valuable part of our community. They regard it as essential that existing sites are safeguarded and new sites are looked upon favourably so long as they aren't in the Green Belt…. (this would have to be justified if it was allowed to happen). |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | E. H. Schubert Will Trust |
| **Comment ID** | 12403425/1690 |

| | |
|---|---|
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | No Comments at this time.<br><br>**Conclusion:**<br><br>We trust that these Comments are helpful. We look forward to receiving confirmation of receipt. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Frampton Cotterell Parish Council |
| **Comment ID** | 20175105/1702 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | There is no mention of Winter storage - Frampton Cotterell Parish Council is of the opinion that this needs to be addressed. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | G. E. Forward |
| **Comment ID** | 20176577/1726 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | If a site were to be provided in our area, and I question why, as they are not travelling, I hope it would be better monitored and managed than the appalling site at Almondsbury by the side of the M4. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sue Hope |
| **Comment ID** | 411169/2039 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | **Travelling Showpeople:**<br><br>There is no mention of storage of equipment in this Policy, which is a significant issue that needs to be taken into account. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Amanda Scott |
| **Comment ID** | 20374561/2298 |
| **Document Part Name** | Question 18 - Travelling Showpeople |
| **Comment** | **Travelling Showpeople:**<br><br>South Gloucestershire Council is required by national Planning Policy to identify and update annually, a supply of specific sites for Travelling Showpeople sufficient to provide a five year supply of deliverable sites and a further five year supply of developable sites against locally assessed need. The approach proposed in the Local Plan Prospectus will ensure that sites are available for Travelling Showpeople in line with assessed need. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Joanne Severinsen |
| **Comment ID** | 16468545/43 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | I believe there is a current, Plan wide Policy, that allows residential development within an existing residential curtilage subject to the property lying within an existing Settlement Boundary. As there is an obvious need for additional housing across South Gloucestershire it would seem sensible to allow residential development, within an existing residential curtilage, of properties that do not lie within a Settlement Boundary. Such a Policy would enable additional housing to be provided in the rural areas without affecting open countryside whether in the Green Belt or not.<br><br>**Attachments** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Margaret Pinder - Sustainable Thornbury |

| | |
|---|---|
| **Comment ID** | 19372321/70 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Do not agree with third element of overall Strategy. We wish to make clear our opposition to the JSP Policy of SDLs, as presently designated. Developments at Thornbury and Buckover are too far from designated employment with insufficient infrastructure to connect via sustainable transport options. They will add to the congestion at Aztec West/Filton which will result from the large scale housing and employment planned for these areas.<br><br>However, if these developments go ahead in the JSP, we agree the need for specific Policies for each development. We would strongly support the 'red line edge' Policy if red line edge etc does permanently define boundary of settlement with no further development allowed outside the red line. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anne Gale |
| **Comment ID** | 16344321/134 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Yes. Nurture our Green Spaces instead of this fixation to cover it in concrete. Once it's gone, it's gone and you are the ones future generations will hold to account. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Thompson |
| **Comment ID** | 17795873/173 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | The Consultation Document is premature – the JSP is still subject to the Examination in Public process. The Consultation Document assumes that the JSP will emerge from the Examination in Public process unaltered and by doing this the Council are effectively demonstrating that they plan to completely dismiss/ignore the contributions made by the public to the JSP Examination process.<br><br>I draw attention to my Comments on the JSP in my Submission to the Examination in Public Process.<br><br>Since the JSP Consultation the Sustainable Access Profile for Thornbury has been updated and this is now included with the Local Plan Consultation Documents. This clearly shows how further housing expansion to the East and North of the edge of Thornbury is completely unsustainable. Walking distances from the existing East and North perimeters to every facility fall outside the recommended maximum and thus all such development will promote the use of cars.<br><br>I note the Report on the Autumn 2017 Strategic Development Location events is now also included with the Local Plan Consultation Documents. The summaries of these events are very simplistic and certainly do not reflect local concerns over the SDLs at Buckover and Thornbury. I would also draw attention to the many detailed written Responses which were submitted after the events. These have been lumped into an Appendix at the end of the Report but are not referred to in the main text. Effectively these detailed written Responses have not been taken into account and this is not therefore in accordance with good Plan making Policy as set out in 2.30 of the Council's Local Plan Consultation Document. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Philip Box |
| **Comment ID** | 19453025/216 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | There are two general areas with low coverage in the Consultation Document which are of significant concern, namely air-quality and Biodiversity preservation. Likewise the Document highlights principles and aims which contradict existing proposals, such as the Buckover "Garden Village," in relation to transport problems.<br><br>**Air Quality:**<br><br>The Consultation Document identifies air quality as an issue in several areas, such as Kingswood, but does not fully expand upon measures to tackle it or consider the impacts of future development. Nor does the Consultation consider tackling harmful air pollution as a consistent, headline priority throughout, this is despite its legal ramifications and potential to rightly obstruct harmful development.<br><br>Instead, cursory reference to air-quality is met by cursory reference to solutions, such as "more street trees" or "greater Public Transport opportunities," these are not fleshed out adequately or given the commitment in language necessary to provide confidence in substantial (adequate) delivery.<br><br>The Document makes a welcome acknowledgement of the over reliance on cars and extensive car use associated with former developments, including particularly the problems of commuting. However it does not fully elaborate on the links between this, air pollution and detrimental impacts on air-quality. Cursory reference to greater Public Transport consideration and solutions does not do enough to tackle the extent of the |

| | |
|---|---|
| | problem. This connects to concerns highlighted by local press regarding the discovery of internal Council communications, which suggested transport provision had been optimistically "fudged" to sound more reassuring and extensive than the potential reality i.e. through phrases such as "potential link to the MetroBus" in fact referring to nothing other than initial, abstract thoughts, with no extensive grounding in practical reality.<br><br>Given the extensive research into the ongoing health problems and deaths associated with air pollution, more comprehensive and thorough consideration of this is required in the Document, rather than cursory bullet point references on the occasional development. Given the early acknowledgement of the ubiquity of cars, air-quality concerns logically applied to every development in question, unless it is very minor in size.<br><br>This means that air quality impacts should be a key point of detailed consideration in each development, with robust and strategic thinking a precondition to development. Currently, these omissions suggest rather than overcoming the deficiencies identified at the start of the Strategy, the Local Plan and JSP will exacerbate them. With warnings of housing plans potentially overshooting transport investment, there is little in the current Document to reassure that this would not happen, particularly in the case of Buckover.<br><br>**Biodiversity:**<br><br>Tackling Biodiversity decline is not adequately reflected throughout the Document as a key principle of development.<br><br>Given the dramatic decline in the UK's native species, both fauna and flora, as evidenced by the RSPB et al.'s State of Nature Report 2016, it is imperative that the impact of new developments on Biodiversity be extensively considered.<br><br>This imperative is affirmed in the UK' s current Biodiversity Action Plan, following the UN Convention on Biodiversity. The national Government has committed to tackling this problem, as detailed in the 25 Year Plan for nature. The national Capital Committee was also created and designated to advise with this regard, and has recommended a thorough and far-reaching Strategy to be robustly enforced (hence the 25 Year Plan).<br><br>Mention of Biodiversity, environmental protection and enhancement is severely lacking from the Consultation Document, and should be present throughout. High quality design principles, as well as discussion of specific developments, should reflect these concerns in detail. This is not only to future proof such developments in line with forthcoming legislative expectations, such as the principle of "net gain for nature" in new housing developments, but also to fit with current objectives. At present, there is clear reassurance that these concerns will be considered, raising significant concerns over whether new developments will substantially harm natural infrastructure, wildlife and contribute negatively to the UK's fight to preserve its Biodiversity.<br><br>No mention is given to a proposed definition of net gain, or use of the 2011 different Biodiversity metric in this capacity, as recommended by the Wildlife Trusts. This should be integrated in order to future proof Plans and accord with the trajectory of current Central Government thinking.<br><br>**Buckover Garden Village 2.31:**<br><br>The Local Plan fails to help mitigate the deficiencies of the Joint Spatial Plan, despite its emphasis on transport requirement principles. In particular, it does not fully elaborate on the transport problems identified for the Strategic Development Areas, or provide meaningful solution principles (Despite emphasising its intention to do so!).<br><br>This is most evident in the case of the Buckover Garden Village, whose transport case included a proposed "connection to the MetroBus." This was one of the primary pillars of the transport case, but this has since predictably been called into doubt through the shrinkage in continued delays associated with the MetroBus project in Bristol.<br><br>This reiterates concern about traffic on the A48, an already congested road, tying to concerns about breaching legal air pollution limits. The High Court recently upheld the decision in Kent against a housing development, which would have caused illegal levels of air pollution (https://www.airqualitynews.com/2017/11/14/planning-decision-upheld-after-air-quality-ruling/ ), with a similar case also occurring in Sussex (https://www.airqualitynews.com/2015/07/03/plan-for-97-sussex-homes-rejected-on-air-quality-grounds/).<br><br>The likelihood of Buckover increasing traffic into Bristol is illustrated by the data from DataShine, (also used in the West of England Joint Transport Study) http://commute.datashine.org.uk. This data shows that a significant majority of Thornbury residents commute into Bristol for work, and given that the proposed site is essentially next door to Thornbury, it logically follows that the lion's share of residents and vehicles follow this trend.<br><br>Given the inadequacy of current transport provision and plans, and the failure to thoroughly integrate reducing and tackling air pollution as a key principle of the Local Plan, the development of Buckover must be reconsidered. It clearly runs against the principles outlined at the start of the Local Plan Consultation on what should be avoided, i.e., highly - car reliant, commuter dormitory settlements with inadequate Public Transport. This also runs the risk of exceeding both illegal pollution limits and increasing Carbon emissions. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tamzen Bury |
| **Comment ID** | 19416385/221 |
| **Document Part Name** | Question 19 Other Comments |

| | |
|---|---|
| **Comment** | Hanham - Regarding the proposal to build up to 180 houses on the field that backs onto Hencliffe Way and knock down two houses numbers 64 and 66 to provide access through Hencliffe Way. The access route through Hencliffe Way is not suitable for the additional number of cars the new houses would bring to the area. As you can see from the attached photos, there are cars parked on either side of the road and the road is not wide enough to allow cars in both directions at times. This is not a problem currently due to the number of residents, however if another 180+ cars were driving through the Estate, there would be traffic congestion and it would be dangerous for an area that has a mix of elderly people or families with young children. Currently there are a group of Junior School children that often play by the roadside or cycle their bikes around. It would be a major change to the purpose of the Hencliffe Way road, and the thought of this is causing people a lot of distress, and stress. |
| **Attached documents** | 5E5401D9-C7E4-4FB9-BFFA-70E903700829.pdf (1.7 MB)<br>6EC8430A-BFF7-4DA5-89F3-8008C2B81EFB.pdf (1.7 MB) |

| | |
|---|---|
| **Respondent Name** | Helen Johnstone - Stroud District Council |
| **Comment ID** | 14317537/266 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **Other Comments on the Consultation Document:**<br><br>Following on from Comments made as part of the New South Gloucestershire Local Plan 2018 - 2036 Prospectus Consultation, we would like to make the following additional Comments on the South Gloucestershire New Local Plan: Consultation Document (February 2018).<br><br>**Part 1: Introduction, Setting the Scene:**<br><br>1. 1.16 should refer to the locational relationship with the protected environments of the Severn Estuary alongside Green Belt and Cotswold AONB designations.<br>2. Population and housing priorities should include ensuring new housing development is located in the right place, supported by the right services and infrastructure to create sustainable development; is flexible and adaptable to meet changing needs across lifetimes and maximises the potential of Brownfield and underused sites to contribute to housing supply.<br>3. Local economy priorities should include delivering sufficient employment land, job opportunities, infrastructure and Policy support to ensure employment growth at the identified Strategic Development Locations to meet sustainable development principles.<br>4. Infrastructure and service provision priorities should refer to master planning of Strategic Development Locations to ensure development, infrastructure and service provision takes place in a co-ordinated manner.<br>5. Travel accessibility priorities should include specific reference to the required comprehensive Junction improvements at M5 Junction 14 to tackle growth arising from this Plan and allow for existing planned growth to be completed within the area.<br>6. Environment, Climate Change and Flood Risk priorities should include enhancing local identity and distinctiveness at Strategic Development Locations to integrate and mitigate the impact of large scale development on existing communities.<br><br>**Part 2: Strategic Development Locations:**<br><br>Whilst it is acknowledged that this element is related to the West of England Joint Spatial Plan and is not the subject of any of the prescribed Consultation Questions 1 – 18 above, Stroud District Council reiterate that the contents of the West of England Joint Spatial Plan and New South Gloucestershire Local Plan should reflect the following concerns raised:<br><br>1. As included in our Consultation Response to the West of England Joint Spatial Plan: Publication Document November 2017, Stroud District Council can only support the SDLs at Thornbury, Buckover and Charfield where they avoid unsustainable commuting through:<br><br>• Provision of Public Transport alternatives locally to Strategic Employment Locations.<br>• Provision of employment opportunities and links with employment and regeneration opportunities nearby, such as at former Berkeley Power Station and at Sharpness Docks.<br>• Tackling traffic capacity issues at J14 of M5.<br>• Reopening of Charfield Station.<br>• Improvements to local infrastructure at Charfield and elsewhere locally and linkages to sustainable settlements within Stroud District.<br>• Linking Buckover Garden Village to surrounding villages and towns, including in Stroud District.<br><br>2. Welcome a proposed Local Plan Policy for each SDL to also include:<br><br>• Inclusion of the Cotswolds AONB and its landscape setting on any Framework Diagram for Charfield.<br>• Specific reference to minimum employment land provision and distribution at each SDL.<br>• Specific reference to infrastructure and service provision linkages in relation to settlements and other key destinations within the wider local area, including within Stroud District.<br><br>3. 2.42 Alongside working with key infrastructure delivery partners, Stroud District Council wish to see a commitment to working with neighbouring Local Authorities with statutory interests, across social, economic and environmental issues, affected by proposed SDLs, to inform the emerging Local Plan SDL Policies and emerging Infrastructure Delivery Plan.<br><br>4. 2.44 Stroud District Council wish to see a strong reference to master planning of SDLs to ensure development takes place in a co-ordinated manner. The Council would also wish to see Consultation with Stroud District Council, as a neighbouring Planning Authority, included as part of any future master Planning Consultation process.<br><br>**Part 2: Non-strategic Development in the Rest of South Gloucestershire:** |

1. 2.52 Emerging Government guidance is now for 20% of allocations to be on sites of 0.5ha or less (NPPF Draft text for Consultation March 2018).

**Appendix 3: Non strategic growth – Green Belt and Areas of Outstanding Natural Beauty (AONB):**

1. *Stroud District Council request that the reference to Stroud in the Paragraph below is deleted as misleading and incorrect.*

*"Within the South Gloucestershire areas of the AONB, as in many rural areas of South Gloucestershire, there has not been planned, allocated development for some time. Nearby Authorities in Stroud and Wiltshire regularly allocate new homes in larger urban centres and villages, to ensure communities in the AONB are able to benefit from the positives provided by an appropriate scale and design of growth."*

2. The adopted Local Plan November 2015 allocates land at urban centres **outside the Cotswolds AONB** to provide for planned growth within the Plan Period to 2031. The previous 2005 Local Plan contained a single allocation for a nursing home complex with associated ancillary dwellings within the Cotswolds AONB at Painswick. The implication of regularly allocating new homes in Stroud District to benefit communities in the AONB is therefore factually incorrect, misleading and should be removed.

**Comments on Supporting Evidence Base:**

**Sustainability Appraisal Report and Sustainability Appraisal Scoping Report (Feb 18):**

1. The Council acknowledges that for many elements of the new Local Plan at this stage there are no realistic alternatives to the proposed high level approach set down in the JSP. The Council recognises that components at this stage do not yet contain a level of detail which allows exploration of different options to achieve the high level approach and the assessment of reasonable alternatives. However the Council would welcome the opportunity to review these options when sufficient detail is available with regards to both Policy approaches and/or broad options as the Plan develops. At present the Council reserve the right to Comment until more data is provided and it is possible to accurately appraise the effects and compliance with the identified objectives adequately. As part of any future assessment the Council would like to see reference to the accessibility and location of surrounding facilities and infrastructure beyond the Plan area included as part of the SA process analysis. This can also be used to highlight the potential for negative, positive or uncertain effects with more certainty as the Plan progresses. The Council believe this is important when assessing rural places in the non-strategic growth options.

**Habitats Regulations Assessment (HRA) Statement – Feb 18:**

1. Habitats Regulations Assessment should ensure that Plans and projects do not have a likely significant effect on any European designated sites for nature conservation. The Scoping Report should ideally provide the background and review of evidence to support the commencement of Screening and the final Habitats Regulations Assessment. We suggest that the Scoping Report at this stage should still usefully refer to:
    - The characteristics of these sites and their conservation objectives.
    - Any other relevant Plans, Policies and projects that need to be considered.

2. In assessing the implications of any Plan or project, it is essential to fully understand the sites in question, their interest features, current condition, sensitivities and any other on-going matters that are influencing each of the sites. The Council advises that every European site has a set of 'interest features,' which are the ecological features for which the site is designated or classified, and the features to ensure the site is maintained or, where necessary restored. Furthermore each site has a set of 'conservation objectives' that set out the objectives for the site interest, i.e. what the site should be achieving in terms of restoring or maintaining the special ecological interest of European importance. They identify the objectives to be achieved for the site, and r whether any Plan or project may compromise the achievement of those objectives.

3. This Scoping Report should provide evidence of what is already available and what further evidence needs to be gathered to inform the development of the new Local Plan. The Document should set out relevant Documents to base a likely significant impact upon. It should start to draw together available evidence relating to potential impacts on European sites and possible opportunities to prevent those impacts from occurring, to enable the Council to consider the level, type and locations for growth that could occur whilst maintaining adequate protection for European sites. Without this the Report provides no initial guidance to the reader to support the Council's consideration of possible impacts on European sites and how the scoping work will inform later stages of the Habitats Regulations Assessment.

4. We also suggest that Paragraph 3.6 could usefully make reference to cumulative impacts. You may wish to make reference to the work undertaken by Stroud District and the identified likely significant impacts from growth which has required mitigation upon Rodborough Common and the Severn Estuary arising primarily from recreational pressure. There is also anecdotal evidence of adverse impacts on the Cotswold Beechwoods arising from recreational pressure just to the North of the 15km boundary line.

5. At Paragraph 4.5 the Council strongly welcomes potential follow up engagement to developing a Draft HRA. This Council sees the HRA as an iterative process and would wish to see and input into a Draft in the spirit of co-operation in order to develop an agreed HRA with South Gloucestershire. The current Scoping Report should allow the reader to assess how any current and future predicted impacts on the District's European sites will inform the preparation of a full Appropriate Assessment for the Local Plan as the Policies and Plan start to emerge. The HRA Scoping should enable deliverable mitigation to be identified early on in the Plan making process. A Scoping Report for the Habitat Regulations should give a review of evidence. It should consider the Habitats Regulations Assessment work to date, and how that previous work now provides the foundations for the assessment of the newly emerging Local Plan. As part of this work the Scoping should provide an ability to consider how well the measures put in place previously to protect European site interest have worked, and what evidence there is available to support the continuation of such measures, or to indicate that they may need modification.

| | |
|---|---|
| | 6. Finally, in addition to the preceding points it would be helpful if Figure 1 the Context Map could identify the varied landscape scale Biodiversity interests so as to help identify what potential exists to avoid fragmentation and isolation of those Biodiversity interests. The inclusion of the Gloucestershire Nature Map and Strategic Nature Areas work could assist this context understanding. |
| **Attached documents** | Question 19 Response.pdf (59 KB) |

| | |
|---|---|
| **Respondent Name** | D. Dawkins |
| **Comment ID** | 19457889/271 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | The proposal to build 3,000 extra houses on the edge of Thornbury is ridiculous!<br><br>• There is little or no local support for the proposal.<br>  ◦ Nor has it the support of Central Government, the local MP nor the Metro Mayor.<br>• The local infrastructure will not cope.<br>  ◦ The Council has not supplied any evidence showing how the infrastructure will cope with 3,000 extra houses.<br>• The development will be less than 100 meters from the edge of Thornbury if all Planning Applications are Approved and built.<br>  ◦ Therefore it is not a distinct settlement.<br>• The Council has a legal obligation to ***reduce*** CO2 emissions.<br>  ◦ Building 3,000 extra houses on the edge of Thornbury where the main centre of employment is down the A38 in Bristol will ***increase*** CO2 emissions.<br>• The 3,000 houses could be built on the other side of the M5 and would satisfy the criteria for Garden Villages. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Roger Hall |
| **Comment ID** | 6216257/278 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | I have deliberately not answered the previous 18 Questions as many of them are irrelevant to the points I wish to make in response to this Consultation and my Comments below relate to specific issues.<br><br>My Response is as follows:<br><br>• My Comments made below should be read in conjunction with the Submission made by Thornbury Residents Against Poorly Planned Development (TRAPP'D) which I support in full.<br><br>• South Gloucestershire Council is failing in its duty to take the Draft Joint Spatial Plan (JSP) for the West of England and convert this into a Local Authority based Plan to show how, where and when this housing will be delivered, and more importantly what infrastructure will need to be in place in order to deliver it. This is a lightweight Document that performs none of these functions. It represents back to front Planning.<br><br>• This Document is premature, in that the JSP has yet to undergo its Examination in Public, and we don't yet know what will be included. The Document seeks to prepare the ground for an overlapping process of approval for Buckover Garden Village prior to adoption of the Local Plan.<br><br>• The JSP uses the Strategic Housing Market Assessment (SHMA) as the basis for its forecast demand. Onto this is added a "market adjustment" (which tilts the balance in favour of supply) to derive an Objectively Assessed Need (OAN) of 97,600 houses for the West of England overall. This compares with a planned build of 105,500, giving a margin for error of 8%. This build has then been allocated to each of the four Authorities, of which South Gloucestershire gets 32,500. However, the SHMA forecast is prepared on a Local Authority basis, so compare this allocated build target with an OAN for South Gloucestershire of 24,000**. This gives an astonishing margin of a 35% excess build over the forecast need**.<br><br>• I cannot tell if this outrageous excess is because our Authority has negotiated poorly, or simply desires to create an artificially high requirement to justify vanity projects such as Buckover Garden Village. This excess build will have consequences for all of us; it means we lose more Greenfield space than needed, we absorb more strain on the infrastructure than is necessary, and endure more congestion and pollution than we should. It will also make it much more likely that this Authority is perpetually below target in its rate of build (the so-called five-year land supply rule) which gives open season for developers to build anywhere they like. The Local Plan has no choice but to take the allocated build within the JSP, but **this Authority should come clean and explain why it has volunteered to take so many more houses than the forecast demand suggests**.<br><br>• This Document is long on describing the challenges that South Gloucestershire faces (congestion and pollution through high levels of commuting, failure of infrastructure to keep pace with development etc), but then offers no explanation as to why the Spatial Strategy proposed (creating a separation, a total disconnect between where people live and where they work) will do precisely the opposite of alleviating these problems.<br><br>• South Gloucestershire has a commitment to achieve specified reductions in the level of CO2 emissions which this Spatial Policy will all but guarantee to cause the Authority to miss. This is a wilful neglect of duty which may also be illegal.<br><br>• South Gloucestershire is alone in the four Authorities in not specifying which transport infrastructure projects are a pre-requisite for the specified Strategic Development Locations to go ahead. In particular there are rumours that the MetroBus will not be extending North to Thornbury and the proposed Buckover Garden Village site. This Authority has a statutory duty to explain what transport and infrastructure it proposes and how this will be funded, which it is clearly failing to do, and to guarantee that these developments will only be allowed if the infrastructure is built first. Even the Council's own Strategic Planning Officers cast aspersions on the ability to deliver the necessary Highways and Public Transport infrastructure to support this Plan.<br><br>• There is no firm Joint Transport Plan in place to support this overall Plan. Even if the necessary infrastructure is fully funded and in place, there is no indication of how the Council will implement a Travel Plan to change the commuting behaviour of new (let alone existing) residents to use Public Transport, which will be essential if pollution reduction targets are to be met. |

| | |
|---|---|
| | • It is all very well stating that Thornbury will always be a sustainable location compared to other areas within South Gloucestershire. However, as more businesses close through lack of footfall (caused by shortage of parking), online shopping etc, and are replaced by eating establishments, the Town will become an 'evening only' venue. This in turn will increase pollution levels as residents will drive to further afield Shopping Centres with a wider, more comprehensive choice of retail outlets. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Emma Jarvis |
| **Comment ID** | 2745345/284 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Re Paragraph 2.39:<br><br>Please refer to my previous Comments in the attached Document. |
| **Attached documents** | JSPPublication9223797.pdf (769 KB) |

| | |
|---|---|
| **Respondent Name** | Lesley Brown |
| **Comment ID** | 16384673/296 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | An accurate review of the Sustainability Appraisals should take place. Although it states that this was done in February 2018, at present they are completely inaccurate. This gives a wrong impression of which areas can sustainably take more housing e.g. Winterbourne is stated as having only 3 comparison retail stores. In fact it has at least 27! Many of it's facilities have been omitted. Frampton Cotterell is said to have a Post Office in Church Road, when in fact this was closed at least 12 years ago. I forwarded the correct information to the Planning Department via Cllr Claire Young. These are just the areas that I know of as I am not familiar with others but it does cast doubt on all the Appraisals I would suggest. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Claire Young |
| **Comment ID** | 916289/352 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | • Having seen previous Plans developed then rendered irrelevant by the lack of a 5 year housing land supply, I would like more clarity on how this Plan will be different. What will the Council do to ensure it doesn't end up back in the same position it is in now two or three years into the Plan? How will it make sure that developers deliver the houses on the sites allocated, rather than getting Permission to build on other sites?<br>• I am concerned that stating that the release of the contingency at Chipping Sodbury and in the rural areas will only take place where it is demonstrated that housing provision is not being delivered at the levels being planned for gives developers another incentive to slow delivery on allocated sites.<br>• Similarly, having seen developers successfully negotiate down Affordable Housing requirements on previous large developments, how will this Plan ensure that local people can afford the houses provided?<br>• The Vision on Page 4 in the Introduction should also cover improving the health & wellbeing of residents and preventing & adapting to Climate Change.<br>• It is important that Policies for the SDLs in the final Plan safeguard land for sustainable transport links and green infrastructure and makes their provision a requirement of the development. For example, I would like to see the route of the old Frog Lane Colliery railway turned into a path for pedestrians, cyclists and horse riders, providing a link into the Yate Spur cycle path and via that to the Bristol to Bath Railway Path. If following the Joint Spatial Plan Inquiry any of these sites are not taken forward, I would still want the land safeguarded for this use in a Policy in the Local Plan. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David White |
| **Comment ID** | 5522945/373 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Although you provide plenty of details you make it very difficult for people to respond as they have to wade through so many words of "Council Speak." As a result it will not encourage many to respond, or is that the idea? |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Hicks - Falfield Action Group |
| **Comment ID** | 16618369/375 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **Joint Spatial Plan (JSP) & South Glos Local Plan:**<br><br>The JSP and Local Plan are not 'ensuring the right growth in the right places' with SDLs being located in rural areas away from Strategic Employment Locations. |

The JSP is yet to be reviewed, inspected, Examined in Public or Approved, hence the Local Plan is premature.

**Housing Need Data:**

The housing need forecast for the JSP was produced in 2015 and is now out of date and does not take into consideration the impact of Brexit. It also fails to take into consideration the impact of reduced (from 08/1/2018) and zero Tolls on the Severn Crossings (from January 2019), which are likely to reduce the need for housing in the WoE JSP area due to better travel flexibility and lower housing cost options on the Welsh side of the River Severn. The JSP and ergo the Local Plan, do not account for the reality of the situation.

Under the NPPF, Local Authorities must use latest available information in their calculations. The housing need should be revisited using the most recent forecasts available. There should be an aligned committed timetable (across the JSP & Local Plan) for reviews throughout the Policy Period. The Local Plan makes reference to reviewing the number of the 'contingency,' but fails to make any commitment to reviewing the Local Plan itself or volumes therein during the period it is valid. This should include a review to coincide with publication of the Census results to ensure the Strategy and housing numbers are ratified at the earliest opportunity.

Investigations and analysis by our colleages at TRAPP'D established:

- The JSP uses the Strategic Housing Market Assessment (SHMA) as the basis for its forecast demand.
- Onto this is added a “market adjustment” (to tilt the balance in favour of supply) to derive an Objectively Assessed Need (OAN) of 97,600 houses for the West of England overall.
- This compares with a planned build of 105,500, giving a margin for error of 8%.
- This build is then allocated to each of the four Authorities, of which South Gloucestershire gets 32,500. However, the SHMA forecast is prepared on a Local Authority basis, so we can compare this allocated build target with an OAN for South Gloucestershire of 24,000. This gives an astonishing margin of a 35% excess build over forecast need.

Falfield Action Group challenge the allocation as this excess build will have consequences for all of us:

- It means we lose more Greenfield space than we need to, absorb more strain on the infrastructure than is necessary.
- We will endure more congestion and pollution than we should.
- It will also make it much more likely that this Authority is perpetually below target in its rate of build (the so-called five-year land supply rule) which gives open season for developers to build anywhere they like.

The Local Plan has no choice but to take the allocated build within the JSP, but we concur with our colleagues from TRAPP'D:

- South Glos should come clean and explain why it has volunteered to take so many more houses than the forecast demand suggests.

**The Green Belt & Satellite Growth:**

61% of South Gloucestershire is Green Belt. The Green Belt boundaries were defined predominantly between the 1950’s and 1980’s. Calls for the Green Belt boundaries to be redefined during previous Consultations have been disregarded. Without a revision of the Green Belt boundaries, Greenfield areas will be lost, including those of high agricultural quality and the Map of South Glos clearly demonstrates that the only significant 'band' of non-Green Belt land is to the North of the region, the furthest away from major employment centres and the least sustainable. South Glos have a duty to ensure Greenfield sites do not suffer disproportionately because of boundaries which are upwards of 20 years old, which do not consider recent or future population and economic growth.

The strategic residential developments are located long distances from the strategic/main employment areas. This create a separation between where people work and where they live (satellite development), creating Dormitory Towns. It is not conducive with reducing the use of private motor vehicles.The transport solutions proposed in the JSP will not be able to accommodate the range or flexibility of routes required and will not satisfy the needs of commuters needing to travel beyond the boundaries of the local Public Transport routes. The inconvenience and lack of well-planned connections will result in commuters choosing to continue to travel by car. This is contrary to one of the key principles set of the JSP, namely to minimise the number of car journeys. Congestion and air pollution will be increased by taking this satellite approach.

There should be a comprehensive review of the residential and employment sites identified in parallel with the Green Belt review as detailed above, to ensure that housing locations are in the right places to enable them to be sustainable in transport and employment terms. The reviews will highlight the fact that there are housing solutions available much closer to areas of employment growth, for example around the M4/M5 Interchange. Although these sites are within Green Belt they are not areas of great environmental value, and can be developed without the detrimental environment impact or the sustainability issues. Alternative proposed Strategic Locations such as Woodlands Garden Village (adjacent to M4/M5 Interchange) should be revisited and the merits of proposed locations analysed thoroughly with transparent outcomes being made available.

**Call For Sites:**

The locations of future development are being driven by landowners who have offered their land up for development, rather than being based on sound Planning principles and decisions. This is not a sound basis upon which to shape our future. The JSP & Local Plan should change the basis

of where developments should take place and if land is not available, use Compulsory Purchase Rights to ensure residential and employment development is located on the most appropriate, rather than the most readily available land.

**Infrastructure Provision:**

South Gloucestershire is the only Authority that did commit in the JSP to ensuring the provision of Transport infrastructure being in place before the SDL's developments start. The Local Plan follows suit as there is no commitment for any infrastructure implementation schedules to be in place before the Strategic Locations are Approved. Without this commitment, what is likely to ensue is development before infrastructure improvements, which will have a significant detrimental impact on communities. Infrastructure MUST lead rather than follow development. The Local Plan should have a Policy to commit to this provision and to give priority to infratructure provision for SDLs. The provision of the necessary infrastructure and transport either ahead or alongside the development should be made a precondition for granting Approval of the strategic development sites.

**Strategic Developments Locations (SDLs):**

The absence of **ANY** Questions concerning the SDLs is of great concern and implies a total disregard for local residents' views on them. They have NOT been Approved under the JSP, indeed the JSP states it will be Local Plans that determine the actual location:

- Page 4 of the Local Plan states – 'The driving force is the Joint Spatial Plan which is the higher level Plan for the West of England area and **sets** the strategic housing and employment numbers and **locations for development**.'
- The JSP states – '**Policy 7: Strategic Development Locations (SDL): This Policy sets out the specific Policy requirements for each of the proposed SDLs. <u>These locations will not be allocated through the JSP it will be the role of the new Local Plans prepared by individual Authorities</u> to make the allocations for the SDLs and provide delivery guidance.**

The two statements contradict each other. There is NO evidence that SGC have undertaken any material consideration for the location of the SDLs within the Local Authority. In the case of Buckover Garden Village, two alternatives have been put forward, but have been effectively 'swept under the carpet' and this is NOT acceptable.

**Buckover Garden Village:**

There is local opposition at all levels (including Parish and Town Councillors and our local MP); general dissatisfaction with the JSP Consultation process and the disregard given to very valid issues and concerns by South Gloucestershire Council. Having asked for alternative locations at initial public event hosted by TRAPP'D for suggestions for alternative locations (question asked by ), the two proposed Woodland Garden Village and 'the Tortworth Garden Village (proposed by local Architects) have been disregarded. These, along with unsustainable developments being Approved in recent years, result in very little confidence in the Planning process.

Buckover Garden Village is not a village. It is a town and would be one of the largest in South Gloucestershire, but without the supporting infrastructure, employment and services to make it sustainable. It is high density housing with a mere 11 hectares of land set aside for employment which would offer limited employment opportunities for the thousands of working-age adults. Buckover Garden Village would not be a discreet settlement. It would be an extension of Thornbury and was originally marketed as just that (as per key on Map of final page of West of England Joint Spatial Plan (JSP): Issues and Options for Consultation (November 2015) Document) - *attached*, until Tortworth Estate and South Glos Planning Department decided to apply for inclusion in the Government's Garden Cities Towns and Villages Initiative, when it was suddenly renamed a 'new settlement' to try and align to the Government's criteria for a Garden Village, which it fails to do.

It is not locally led development. It is opposed by Falfield Parish Council and Thornbury Town Council. The application to the Government Scheme and inclusion in the JSP was without Consultation with either. It is opposed by Luke Hall MP and twice failed in its attempt to get Government backing. The development is favoured by SGC as the land is offered by a single landowner which simplifies the process. This is not a sound basis upon which to select the site for such a major development.

We have already seen 'compromises' to the original offering proposed by Tortworth Estate - the 'new' M5 Junction has disappeared as has the re-routing of the A38, hence the 'village' will be dissected by this very busy A Road, which is the Relief Road to the M5. Simply stating "a solution must be found for the A38" is unsatisfactory. This location would be a mere 500m away from the outskirts of Thornbury. The proposed 'buffer' is inadequate; in reality a thin strip of land. If Tortworth Estate wish to proceed with the Garden Village, the location should be reconsidered - they have a vast Estate with scope to site the 'village' elsewhere and create a genuine new settlement, which would not impact the busy A38 or have a detrimental impact on Thornbury. The Buckover proposal would be far more sustainable if the location was changed to an area East of the M5 Junction 14, East of the M5 alongside the main railway line serving Bristol, Yate, Cam, Gloucester and Cheltenham where there are opportunities for new railway stations to serve the residents. This would be in harmony with the aspirations of the Joint Transport Plan which aims to reduce car usage and road congestion.

The site is within a few miles of the proposed new Nuclear Plant which will be delivered in a similar time frame, yet there is no mention if the significant population increase in Buckover would be permissible due to its proximity to the new nuclear site.

A full review of housing demand, the Green Belt and sustainable locations is needed. Following which, if a Strategic Location/Garden Village is needed in South Gloucestershire, the JSP & South Glos Local Plan need to consider and fully analyse the alternative 'Tortworth Garden Village' (proposed by local Architects, but disregarded by Tortworth Estate and South Glos) and 'Woodlands Garden Village' to ensure that the most appropriate location is selected.

**Flood Risk:**

| | |
|---|---|
| | The current process of granting Planning Permission in areas prone to flooding on the general basis that SUDs provision will be made without first confirming the viability of such systems is inadequate and causes anguish and concern to residents in the locality of proposed developments who might be adversely impacted by these developments if the SUDs systems are inadequate. This results in:<br><br>• Objections to Planning Applications due to the perceived increased isk of flooding.<br>• Development Committees approving Applications without being fully informed.<br>• Delays in progressing developments (e.g. Park Farm in Thornbury) whilst issues encountered are overcome, leaving opportunities for land banking and other speculative developers making Applications when targets are not hit by the original developer.<br>• Increase in costs that developers can use to offset against the provision of Affordable Housing. If developers have to undertake full analysis at their expense, without the security that if costs increase they can apply for a reduction in the Affordable Housing quota to protect their profits, then developers would be less likely to proceed with Applications likely to hit their pockets.<br><br>**Infrastructure:**<br><br>We would like to see a local Policy whereby developers are required to consider the extension of new utilities (e.g. mains foul waste sewers, gas) to existing residents living close to the new development site in rural areas. |
| **Attached documents** | BGV Original Submission to JSP.pdf (2.6 MB) |

| | |
|---|---|
| **Respondent Name** | Jill White |
| **Comment ID** | 10710785/388 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | I have found this Document incredibly difficult to navigate. As it is intended for public Comment it should be easy to use and understand. I know many people who wished to Comment on this Local Plan but have given up trying as it is too complicated. Each time you submit a Comment you have to go back to the beginning of the Document. It is frustrating and I wonder if this is deliberate to deter people from doing so. I suggest you ask an elderly relative who would like to put forward their views, to try to complete it on their own and see if they can manage it! |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Lesley Brown |
| **Comment ID** | 16384673/390 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Sustainability Appraisals although updated in February 2018, are still very inaccurate and need to be repeated with the correct, accurate information. I have sent a list of inaccuracies to the Planning Dept. These refer to Winterbourne and Frampton Cotterell as these are areas that I know. On that basis, I suspect that there are many inaccuracies in the other areas. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christopher Edwards - Cheltenham Borough Council |
| **Comment ID** | 19779905/395 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Cheltenham Borough Council welcomes the opportunity to comment on the South Gloucestershire Local Plan.<br><br>We note the Plan's contents, particularly the challenges faced in terms of identifying sufficient and appropriate land to meet considerable future development needs.<br><br>We note the particular challenges in relation to new residential and employment provision and the need to facilitate a shift away from travel by private motor vehicle to more sustainable Public Transport options instead.<br><br>The historic pattern of car-led developments in the area over many years coincides with the continuing lack of choice in other transport modes, congestion and pollution, and a dearth of integrated/mixed-use communities that rely less on the need for travel and more on the principles of sustainability and self-sufficiency.<br><br>At this stage, Cheltenham Council does not propose to comment further but looks forward to being kept informed of progress on the Plan with a view to making more detailed comments in future. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Victoria Bywater - Pilning & Severn Beach Parish Council |
| **Comment ID** | 7858721/396 |

| | |
|---|---|
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Severn Beach:<br><br>Pilning & Severn Beach Parish Council would like the Local Plan to reconsider the development of the former railway land at Severn Beach which is (i) a Brownfield site, (ii) is raised above the Flood Plain and as such is least likely to flood, (iii) is within the development boundary of the village. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David Mansfield |
| **Comment ID** | 16945441/397 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | I am using the opportunity offered by the Local Council to raise my objection to the potential threat to the green space shown as 'The Batch' (between Castle Farm Road/Water Lane/Hencliffe Way/and Avon Valley Woodland.<br><br>This area of green space, which is in the Green Belt, is of huge significance to those residents who live close to or in the area under threat, whilst the benefit from the potential of 180 houses added to the total houses built in the South Glos area, is likely to be insignificant. Particularly when compared to the numbers that could for example be provided on the Kleeneze site.<br><br>At the present time the area under threat is a natural break in the slow expansion of the boundary of the City of Bristol. When viewed at night it is easy to see there is almost no break in the urban sprawl from East Bristol. It is not difficult to see how the Bristol boundary will soon reach Keynsham.<br><br>At this present time the area known as the Batch is used daily for recreation in the form of walking, running, dog walking, horse riding, off road cycling, all these activities would be severely curtailed if the area were to be developed. The increase in traffic will be to the detriment of the area as the main entrance to the site will be via Castle Farm Road, the width of which reduces to only single lane traffic close to the entrance to what was Castle Farm. The introduction of priority control will add to the frustration of motorists and pedestrians who will be forced to use the road as the pavement does not extend the full length of Castle Farm Road, particularly through what is in effect a pinch point. It is likely the increase in car use would be to the detriment of the residents of a new site taking into account of at least one or two cars per household will concentrate over 300 vehicles to a small inaccessible site.<br><br>Throughout the time we have lived in the area the wildlife has continued to offer at least a glimpse of what this area of natural countryside has to offer. Recently we have seen Deer, foxes, squirrels and heard evidence of badgers. All this is likely to be severely disrupted by any development.<br><br>This site must be allowed to remain in the Green Belt now and into the future otherwise the encroachment of the Bristol boundary will be to the detriment of the entire community of Hanham. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kevin Wilkinson - Avon and Somerset Police |
| **Comment ID** | 1052481/418 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Please see attached Document. |
| **Attached documents** | Avon and Somerset Police (Kevin Wilkinson).pdf (590 KB) |

| | |
|---|---|
| **Respondent Name** | Donna Ford - Iron Acton Parish Council |
| **Comment ID** | 1060385/455 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Other (a):<br><br>**Engagement with Local Councils:**<br><br>While South Gloucestershire has offered opportunities for Parish and Town Councils to send Representatives to briefing events, and has invited them to respond (along with individual members of the public) to its proposals, it has not sought direct engagement with local Councils, even on proposals for development within their boundaries. Whether or not it is required by legislation, as a matter of good practice South Gloucestershire should approach local Councils for specific discussions about their areas and potential development therein before further refining its Local Plan proposals. Before any proposed Plan-led development within a local Council's boundaries South Gloucestershire should tap into local knowledge of public opinion, significance locally, sustainability, land ownership, historic or ecological value etc through Officer and Elected Member engagement. This would be consistent with the spirit of the South Gloucestershire Statement of Community Involvement and alert the Authority to issues of particular local sensitivity or concern. |

| | |
|---|---|
| | Iron Acton Parish Council would welcome a meeting with local South Gloucestershire Councillors and Planning Officers to discuss the current proposals affecting the Parish and alternatives to these. Such a discussion might include other local Councils with a particular interest in the Yate/ Chipping Sodbury area. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Donna Ford - Iron Acton Parish Council |
| **Comment ID** | 1060385/456 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Other (b):<br><br>**M4 Junction 18A:**<br><br>The decision in March 2018 by South Gloucestershire Cabinet Members to recommend the Lyde Green option for the new Junction 18A on the M4 following the public Consultation in 2017 means that Highways England is now in a position to make a firm recommendation to the Department for Transport on its location. The new Junction would include a link to Yate effectively redrawing the strategic transport routes and changing significantly the relative sustainability of different locations for new development in the Yate/Chipping Sodbury area. Yet despite the fact that work on the new Junction could begin as soon as 2025, according to reports in the "Bristol Post" newspaper, it seems that there is no intention to take account of this in a Local Plan that would run to 2036. The Parish Council strongly urges South Gloucestershire to work with Highways England and neighbouring Local Authorities now to take account of this in both its new Local Plan and the Draft Joint Spatial Plan (through the Inquiry process). Failing to do so will undermine fundamentally the Spatial proposals in both Plans.<br><br>The proposed new Junction 18A on the M4 would be a major enhancement of the strategic transport links between Yate/Chipping Sodbury, the greater Bristol conurbation and the Motorway Network. It would increase considerably the capacity of connections running North/South. It would be likely to eclipse the A432/A46 route running East to the M4 and greatly reduce the importance of the B4059/B4509 route North to the M5 and the B4058/B4059 Bristol Road route West to Bristol via Frampton Cotterell. By pulling commuter and heavy goods traffic off the Bristol Road it would help reduce both the chronic congestion and the blight caused by lorry movement. It would enhance rural tranquillity and might even preclude the need for the expensive Frampton Cottrell/Winterbourne Bypass proposed in the Draft Joint Spatial Plan. It would throw into question the Draft Plan's proposals to locate major new development to the North West of Yate, in Coalpit Heath and to the South East of Chipping Sodbury.<br><br>Despite this the implications of the proposed new Junction are not addressed in proposals for either Plan. South Gloucestershire should remedy this omission by reconsidering the sustainability of the different locations (including revisiting the Sustainability Appraisal) in its further work on its new Local Plan. Where such a review indicates that the locations proposed in the Draft Joint Spatial Plan are sub-optimal South Gloucestershire should acknowledge this to the Inquiry Inspector and offer to rework the proposals (in conjunction with the other three Authorities) rather than press ahead with a Plan which will quickly be shown to be inadequate and ill-conceived, causing confusion and loss of confidence amongst local communities and developers alike. This would, in turn, change the proposed approach to its Local Plan revision. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Donna Ford - Iron Acton Parish Council |
| **Comment ID** | 1060385/457 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Other (c):<br><br>**General approach proposed for the Local Plan:**<br><br>The Parish Council supports the key issues and priorities identified in the Consultation Document, the aspirations for the future and the broad approach set out. It is not satisfied, however, that the steps proposed and the means for achieving these constitute the best way to address these issues. It considers that in some respects the details of the proposals run counter to the interests of Iron Acton Parish's residents and its settlements. Current proposals would be unfair, disproportionate, and would have an overall adverse impact on the Parish.<br><br>The Parish Council supports the proposal that the starting point should be the completion of existing Core Strategy developments in South Gloucestershire. Further, it supports the proposal that priority should be given to urban renewal and maximising the use of Brownfield land in Yate/Chipping Sodbury in order to minimise Greenfield take. This is in line with conventional Planning wisdom, and while individual initiatives might prove controversial in the future (for instance the current public controversy over the proposed demolition of the Yate Magistrates' Court) the principles are sound. As the Consultation Document makes clear, the effect would be to increase the viability and vitality of town centres while reducing development on Greenfield sites outside the urban area. The Western part of the area covered by the Nash Partnership Study lies within Iron Acton Parish and the Parish Council would expect to be fully involved in the development of proposals for this area. It also borders on, or may form part of the North West Yate Strategic Development Location proposed in the Draft Joint Spatial Plan to which the Parish Council is strongly opposed (see comments below).<br><br>The Parish Council has yet to be persuaded of the need for, and viability of proposals for Greenfield development in the Yate/Chipping Sodbury area that go beyond the completion of existing Core Strategy Plans and those for urban renewal. For Iron Acton Parish, the most significant of the Core Strategy provisions is the North Yate New Neighbourhood which, 12 years after the Core Strategy was agreed, has yet to proceed beyond "a very advanced stage of Planning." It would provide around 3,000 new homes for Yate. The extraordinarily slow progress on the New Neighbourhood raises questions about housebuilders' perception of the extent of demand in the Yate/Chipping Sodbury area and whether over the |

| | |
|---|---|
| | next 20 years demand will be sufficient to support additionally the proposed North West Yate development (up to 2,000 plus homes), the proposed strategic development at Coalpit Heath (1,800 homes) and a further contingency in Yate/Chipping Sodbury (1,500 homes), a total of 8,300 homes (excluding Brownfield/urban renewal, non-strategic and windfall). This massive increase in housing is proposed in an urban area where the existing total dwelling stock is 15,611 (Yate/Chipping Sodbury plus Coalpit Heath). Over the 20 year Plan Period that would mean a 53% increase or over 2.5% sustained annual growth in provision. Since the South Gloucestershire population has grown by only 1% over the past 25 years the implied level of demand and sales simply does not look credible. Assuming an average of 2.3 people per dwelling, it would necessitate a 2.7% annual increase in the population of the Yate area for the next 20 years, well over the historic rate for South Gloucestershire. No evidence is provided to show that levels of demand would make this possible, let alone likely. Further, there is no assessment to show that South Gloucestershire's aspirations for increases in infrastructure would be anywhere near adequate to meet a 50% rise in population over the Plan Period.<br><br>The Parish Council notes that the Prospectus provides, properly, for the inclusion in the new Local Plan of the proposals contained in the Draft Joint Spatial Plan. There is a national requirement in Planning Policy for Local Plans to reflect the relevant content of superior Plans, since they sit under these and must provide the detail of how the superior Plan will be implemented. The Parish Council notes, further, that the Draft Joint Spatial Plan states specifically that it will be for South Gloucestershire's Local Plan to set out the "exceptional circumstances" to justify development in the Green Belt (specifically, the North West Yate Strategic Development Location) specified in the Strategic Plan. This introduces a circularity in the logic. The Local Plan must be compliant (it has to include North West Yate) and it must establish whether "exceptional circumstances" justify that development in the Green Belt. What happens if a proper consideration concludes that "exceptional circumstances" do not exist (as Iron Acton Parish Council contends). The Prospectus does not set out where or whether South Gloucestershire will make the "exceptional circumstances" assessment. So how will the test be applied?<br><br>When this was put to a South Gloucestershire Planning Officer at a briefing event for Parish Councillors, his oral advice was that inclusion in the Joint Spatial Plan would of itself constitute those "exceptional circumstances." That is puzzling, however, since it would mean that the test required by the National Planning Policy Framework was effectively bypassed. The "exceptional circumstances" judgment would not be made through the Joint Spatial Plan process. The Draft Spatial Plan specifically passed the responsibility for this to the Local Plan. And it would not be made through the Local Plan process since this, as the subsidiary Plan, would simply have to include the Strategic Development Location because it was in the superior Plan (this appears to be the assumption in the Local Plan Prospectus). The judgment, even if it were taken somewhere, would not be visible in either Plan process, making it untestable. What seems more likely is that it would simply be bypassed. It does not seem possible that this could have been the Secretary of State's intention when setting out in National Policy Guidance the strong presumptions against development in the Green Belt.<br><br>Since the West of England Joint Spatial Plan is the first in England to progress to a Planning Inquiry, this issue has, to the best of the Parish Council's knowledge, not been previously tested and yet will be central to whether or not the Draft Spatial Plan and the Draft Local Plan are compliant. The Parish Council urges South Gloucestershire, therefore, to seek independent, expert legal advice on this issue ahead of the next Consultation on the new Local Plan and before the start of the Spatial Plan Inquiry. Once received, it should share that advice with the Joint Spatial Plan Inquiry Inspector and with Local Councils, make it public ahead of the Inquiry, and take it into account in the next iteration of the Local Plan making process. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Donna Ford - Iron Acton Parish Council |
| **Comment ID** | 1060385/458 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Other (e):<br><br>**Proposed Strategic Development Locations in Yate/Chipping Sodbury area:**<br><br>Iron Acton Parish Council reiterates its opposition to the proposed North West Yate Strategic Development Location. The Draft Joint Spatial Plan failed to demonstrate that it was the most sustainable location for strategic development on the Yate periphery; it failed to demonstrate that there were exceptional circumstance such as to justify development in the Green Belt; and it failed properly to Consult local communities in line with South Gloucestershire's Statement of Community Involvement (the basis for this conclusion is set out in the Parish Council's Response to the Consultation on the Draft Joint Spatial Plan). The Parish Council regards it as unsound, unnecessary, unjustified and unsustainable. It urges South Gloucestershire to reconsider its support for the North West Yate proposal. It should not be included in the new Local Plan for South Gloucestershire.<br><br>Failing that, it should take proper note of the very strong opposition of Yate Town Council, Westerleigh Parish Council and Iron Acton Parish Council to the strategic developments proposed for the Yate/Chipping Sodbury area as a whole. They have put forward strong arguments that the Draft Joint Spatial Plan is both unsound and legally non-compliant, a view the Joint Spatial Plan Inquiry may support. Given this, South Gloucestershire should, as a matter of sensible Plan making, put in place contingency arrangements for a version of the new Local Plan that does not include the Strategic Development Locations currently proposed for the Yate/Chipping Sodbury area.<br><br>In the Consultation Document South Gloucestershire makes great play of the importance it attaches to the views, vision and aspirations of local people. And yet the reaction of local people and their representatives in local Councils has been overwhelmingly negative – not only to the proposals, but to the way they have been Consulted. The Prospectus Document says:<br><br>"good Plan making also requires that the vision and aspirations of local communities are taken into account and that Plan Objectives are clear, viable and deliverable" (Section 2.30).<br><br>It continues: |

| | |
|---|---|
| | "We are using this opportunity to explain how we will continue to ensure our communities and other partners will play a central part in helping to shape these new Strategic Development Locations. This will help to ensure that the aspirations that local people may have for their particular communities are incorporated into the development where possible" (Section 2.32).<br><br>It explains that the intention of the 'Concept Diagrams' in the Draft Joint Spatial Plan was to obtain reactions and feedback including:<br><br>"to understand what aspirations local people have for the type of place and community that could eventually be created" (Section 2.34).<br><br>"We did this because we felt it was essential that as a Council we heard from communities directly about the things they want us to consider in drafting Planning Policies" (Section 2.35).<br><br>The Parish Council welcomes this strong commitment to effective engagement with local communities – an indication, perhaps, that South Gloucestershire has taken note of the unhappiness in so many communities, including our own. If it is to live up to its words, South Gloucestershire must engage much more directly with the Parishioners of Iron Acton. It should not regard the North West Yate location as "empty fields" ready and willing to be colonised by an expanding urban area. These green fields, most of them in the Green Belt, are known, cherished and used by local people. It is misguided to take the view (implicit in Documentation and correspondence from South Gloucestershire) that since the development would be an extension of Yate, Consultation on it should be focussed on, and held in Yate rather than Iron Acton Parish.<br><br>South Gloucestershire needs to take a long, hard look at the disparity between its declared aspirations and the reaction it has had to its Plans. It needs to re-engage with its communities, hear what they say, value their opinions and expertise and reframe its proposals accordingly. To do otherwise will feed cynicism and the perception that its declarations are no more than the pious words of an Authority going through the motions of Consultation. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Donna Ford - Iron Acton Parish Council |
| **Comment ID** | 1060385/459 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Other (f):<br><br>**Design of new development:**<br><br>Iron Acton Parish Council welcomes South Gloucestershire's commitment to a "master-planning approach" to strategic development "in Consultation with local and community interests." Where Strategic Development Locations do proceed, and notwithstanding its opposition to the North West Yate proposal, the Parish Council welcomes the commitment to a "Framework Diagram" with a red line edge and showing the location of key transport links and green infrastructure. It sees the inclusion of at least 35% Affordable Housing as essential. Planning Applications in Strategic Development Locations which do not deliver this should be refused. It regards design as all important - including attention to, and requirements on the form, scale and appearance of development. It shares South Gloucestershire's view that no development should be begun without pre-delivery of essential infrastructure.<br><br>However, the Parish Council does not agree with the proposal, contained in the Draft Joint Spatial Plan Documents and reiterated in the Local Plan Prospectus that the style and aesthetic of any new strategic development in the Parish should be consistent with the "modernist" feel of post 1960's housing in Yate. If there is to be a "new neighbourhood" it should reflect the traditional pennant stone building tradition that is characteristic of Iron Acton Parish and can still be found in the surviving buildings from Yate's past as a small historic village. As English Heritage's 2011 publication, "Strategic Stone Study: A Building Stone Atlas of Avon" makes clear, the geological heritage of the West of England is rich, diverse and unique. Local stone has been used in buildings in the West of England since Roman times, and the characteristics of that stone have often determined the local look, feel and the form of buildings. Pennant stone was the historic building material of choice in much of South Gloucestershire and Bristol (the Arnolfini Gallery in Bristol is a notable pennant stone building as is Acton Court in Iron Acton), with deposits stretching from Bristol through Winterbourne, Frampton Cotterell, Iron Acton and into Yate, and including outcrops in Westerleigh/Coalpit Heath. Localised beds of thin pennant occur in Westerleigh, Iron Acton and Yate and this stone, probably quarried in Ram Hill (in Coalpit Heath), was used to build and roof Westerleigh Church. Red Pennant is characteristic of most of the historic buildings in the Iron Acton Conservation Area and was used to build the Grade I Listed Acton Court, the 14th Century Church of St James-the-Less, and most if not all of the other 16 Listed Buildings.<br><br>South Gloucestershire's Supplementary Planning Document on the Conservation Area notes that the stone used in Iron Acton was also quarried locally. As part of the local vernacular, pennant stone buildings and walls should be valued for their historic significance, beauty and distinctiveness. Iron Acton Parish Council considers that this vernacular should be reflected in the design of any new development within the Parish. In Frampton Cotterell the new, infill development, "Mayfair Park," (built on the former Western Coach House car park) has tastefully incorporated pennant stone walling into the design of the homes so that it sits comfortably alongside the Locally Listed pennant walled Western Coach House building. A smaller two home development in Rangeworthy, "West View," has been designed to reference the local vernacular, reusing pennant stone on front elevations visible from the B4058. By contrast the cloned buildings characteristic of many "modern" estates (often using the stock designs of developers reproduced with no reference to local style, form or character) are spiritless and unimaginative. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Donna Ford - Iron Acton Parish Council |
| **Comment ID** | 1060385/461 |
| **Document Part Name** | Question 19 Other Comments |

| | |
|---|---|
| **Comment** | SDL - Yate:<br><br>**Urban Localities – Yate:**<br><br>The Parish Council welcomes the proposed "whole town" approach to future Planning for Yate but does not support the inclusion of the proposed North West Yate Strategic Development Location in this approach. As set out above, it believes that in the absence of credible evidence of the massive demand implied by a 50% increase in housing stock over 20 years, and in the absence of credible evidence that building in the Green Belt is justified and the most sustainable option, the North West Yate proposal should not proceed. The Draft Joint Spatial Plan, if implemented through the new Local Plan, would result in either a massive oversupply of housing in and around Yate; or cherry picking of readily developable sites fatally undermining South Gloucestershire's master-planning aspirations; or, which is most likely, the blighting of locations (and homes and businesses) over many years without commencement of development (c.f. the 12 years in which the North Yate New Neighbourhood has failed to be developed).<br><br>The Parish Council supports the proposed focus on the "Western Gateway" around Yate Railway Station and including more intensive and mixed use of the employment areas within the Parish (in particular the Stover Road and Beeches Industrial Estates). It would expect to be closely involved in plans for these and would seek opportunities to reduce the impact of heavy goods traffic on homes on the B4058 Bristol/Wotton Road and the B4059 Latteridge Road, principally by supporting proposals for the new M4 Junction 18A and encouraging heavy goods vehicles to use that route. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | J. Bond |
| **Comment ID** | 17779105/473 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | SDL - Yate:<br><br>Strategic Area. Yate extension in to Iron Acton<br><br>The excessive upgrade of the necessary infrastructure would prohibit the building of affordable and disability user friendly homes at an acceptable cost. There is no gas, high-speed Broadband or sewerage existing infrastructure and the water supply is inadequate and so are the roads. There is already much queuing and stationary traffic both in the morning and evening rush hours.<br><br>Even if employment is adjacent to residential housing:-<br><br>The aspirational aims for multi-modal, non-car, transport and for employment to be immediately adjacent to the housing needed by the relevant work force, is worthy but unrealistic, so better roads would still be needed.<br><br>People not in work need to find a job as soon as possible, a person has to find an employer who currently needs the skills he or she has to offer even if there is no such employer with vacancies locally. The only currently available job is likely to require transport home to work and vice-versa and it would be fortuitous if there happened to be a useable direct Public Transport route that would serve.<br><br>These days both husband and wife need to work. It is unlikely that "green" sustainable travel to work arrangements could be found for both.<br><br>Building character:-<br><br>Yate may have 1960's "modernism" buildings, but Iron Acton has traditional stone which would add to the building costs as new buildings should be in harmony with the existing local character. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Philip Matthews - NuLeAF (The Nuclear Legacy Advisory Forum) |
| **Comment ID** | 19802273/482 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | 1. **Introduction:**<br><br>NuLeAF (the Nuclear Legacy Advisory Forum) is the Local Government Association (LGA) Representative Body on Legacy Wastes and Decommissioning. NuLeAF is directly supported by over Local Authorities and National Park Authorities across England and Wales and speaks for the wider Local Government community. Our remit encompasses all aspects of the management of the UK's nuclear waste legacy. Our primary objectives are:<br><br>• To provide a mechanism to identify, where possible, a common, local Government viewpoint on nuclear legacy management issues; |

| | |
|---|---|
| | • To represent that viewpoint, or the range of views of its member Authorities, in discussion with national bodies, including Government, the NDA and the regulators;<br>• To seek to influence Policy and Strategy for nuclear legacy management in the interests of affected communities; and<br>• To develop the capacity of its member Authorities to engage with nuclear legacy management at a local level.<br><br>NuLeAF's Radioactive Waste Planning Group (RWPG) draws together Planning Officers from English and Welsh Local Authorities with the aim of enhancing Local Authority capacity and supporting the development of Local Plans and Minerals and Waste Plans with clear Policies on Radioactive Waste.<br><br>Through our RWPG, of which South Gloucestershire Council is an active member, we provide opportunities for Local Authorities to engage with the Nuclear Decommissioning Authority(NDA), Magnox Ltd, Government and regulators to inform and comment on developing Policy, Strategy and practice in the management and clean up of existing Magnox sites such as Oldbury.<br><br>This has proved useful in encouraging effective engagement with Local Planning Authorities by Magnox, and in raising their understanding of the Planning System and the needs of Local Government and communities. The RWPG also enables exchange of information between Local Authorities and supports the Duty to Co-operate.<br><br>Given our remit, we have focussed our Comments on Policies **K: Decommissioning of the Oldbury Power Station** and **L: The Storage of Radioactive Waste and Other Hazardous Waste**. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christine Hunter |
| **Comment ID** | 19809025/486 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **(a) Engagement with Local Councils:**<br><br>Before the next stage of producing the new Local Plan South Gloucestershire should tap into local knowledge in Iron Acton about the significance locally of particular sites and areas, their sustainability, land ownership, historic or ecological value etc. This should be a genuine reaching-out to local people rather than simply general "drop-in" events. This would be consistent with the spirit of the South Gloucestershire Statement of Community Involvement and alert the Authority to issues of particular local sensitivity or concern.<br><br>**(b) M4 Junction 18A:**<br><br>The decision in March 2018 by South Gloucestershire Cabinet Members to recommend the Lyde Green option for the new Junction 18A on the M4 following the public Consultation in 2017 means that Highways England is now in a position to make a firm recommendation to the Department for Transport on its location. The new Junction should include a link to Yate. It would change significantly the relative sustainability of different locations in the Yate/Chipping Sodbury area. This should be taken into account in the new Local Plan and in the Joint Spatial Plan. Failure to do so will undermine both Plans and render them unsound.<br><br>**(c) General Approach Proposed for the Local Plan:**<br><br>I agree that the starting point should be the completion of existing, agreed Core Strategy developments in South Gloucestershire, and that priority should be given to urban renewal and maximising the use of Brownfield land in Yate/Chipping Sodbury in order to minimise loss of Greenfield land. This would include proceeding with the North Yate New Neighbourhood which would provide up to 3,000 new homes for Yate.<br><br>Although it is 12 years since the North Yate New Neighbourhood was agreed nothing has been built. This means that there is no justification for the further proposal for 2,000 homes in the neighbouring North West Yate location. North West Yate should not proceed in the absence of clear evidence that there is a demand for another 4,000 homes in the Yate, Chipping Sodbury and Coalpit Heath area. Over-supply of development sites will simply encourage developers to cherry-pick the easiest ones resulting in a piecemeal approach rather than the "master-planning" South Gloucestershire says it wants.<br><br>I also object strongly to siting the proposed North West Yate development in the Iron Acton Green Belt without demonstrating the "exceptional circumstances" required by National Guidance. No justification is given in the Draft Joint Spatial Plan and it appears that no justification will be given in the new Local Plan. So how will the national requirements be demonstrated? South Gloucestershire should rethink. If it has to identify sites for major new development additional to North Yate they should be in areas close to the new M4 Junction 18A, rather than in Iron Acton (which is separated from it by a railway line, the River Frome and unspoilt Green Belt).<br><br>**(d) Design of New Development:**<br><br>I welcome South Gloucestershire's commitment to a "master-planning" approach to strategic developments "in Consultation with local and community interests" and to setting out clearly exactly where it proposes new development should occur. But in villages and other non-urban settlements the design of smaller, non-strategic developments is just as important. This includes paying close attention to the shape, scale and appearance of development to ensure it sits harmoniously within its context. Historic England has pointed out that from Roman times buildings in the West of England have used local stone and other materials giving a characteristic look and feel to our historic settlements. In Iron Acton local |

| | |
|---|---|
| | pennant stone was the most commonly used material along with oak structural timbers. Even the name, Iron Acton, means village of oak. This "local vernacular" should be reflected in the design of any new developments, large or small, in Iron Acton Parish.<br><br>I do not agree that the proposed North West Yate development, if it goes ahead, should have a "modernist" feel to match the post 1960's housing in Yate. Even though it is referred to as North West Yate it would be effectively a separate neighbourhood in Iron Acton separated from Yate by the industrial areas East of the Yate Road/Armstrong Way roundabout. If it is to go ahead despite the overwhelming opposition of local people it should at least be designed with reference to local historic building traditions so that the existing beautiful pennant stone buildings and walls in the area are not overwhelmed and turned into historical anomalies by a "modernist" aesthetic.<br><br>I share South Gloucestershire's view that no development should be begun without pre-delivery of essential infrastructure. In Iron Acton Parish that would include increasing transport capacity to avoid worsening the existing congestion and lorry blight on the B4058 Wotton/Bristol Road, and B4059 Yate/Latteridge Road. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christine Hunter |
| **Comment ID** | 19809025/487 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | SDL - Yate:<br><br>**Urban Localities – Yate:**<br><br>I welcome the proposed "whole town" approach to future planning for Yate but do not support the inclusion of the proposed North West Yate Strategic Development Location in this. In the absence of credible evidence that the Yate/Chipping Sodbury/Coalpit Heath area needs the proposed 50% increase in housing stock (over 20 years, meaning an unprecedented 2.5% average annual population increase), and in the absence of credible evidence that building in the Green Belt is justified and the most sustainable option, the North West Yate proposal should not proceed.<br><br>I support the suggested "Western Gateway" around Yate Railway Station and the aim of more intensive and mixed use of the employment areas within the Parish (in particular the Industrial Estates East of the Yate/Armstrong Road Roundabout). As part of this steps should be taken to reduce the impact of heavy goods traffic on homes on the B4058 Wotton/Bristol Road and the B4059 Yate/Latteridge Road, principally by supporting proposals for the new M4 Junction 18A and encouraging heavy goods vehicles to use that route. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alan Jones - Hanham District Green Belt Conservation Society |
| **Comment ID** | 17236353/499 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Please see attached Document. |
| **Attached documents** | Hanham District Green Belt Conservation Society (Alan Jones).pdf (20.3 MB) |

| | |
|---|---|
| **Respondent Name** | Roy Crew |
| **Comment ID** | 3973121/527 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | With reference to the latest Local Plan Feb 2018 and the Call for Sites I would like to make the following Submission.<br><br>I fully understand that there is a requirement for new Affordable Housing not just in the South Gloucestershire area but across the country. A need brought about by an increasing population, due to birth rates, people living longer, more single occupancy of dwellings due to social factors and uncontrolled immigration. Perhaps Government should where possible be tackling the root causes or do we go on building and building until there is no more land available? We are only a small island and pollution levels are already impacting on the populations' mental and physical health.<br><br>I do not agree with losing our very special Green Belt and green spaces. Listed below.<br><br>**Green Belt:**<br><br>The Batch, Castle Farm Road, Hanham<br><br>Rear of Mount Pleasant Farm, Longwell Green |

| | |
|---|---|
| | Williams Close, Longwell Green<br><br>Larksleaze Farm, Longwell Green<br><br>Court Farm Road, Longwell Green<br><br>**Green Spaces:**<br><br>Hanham Cricket Ground<br><br>Gover Road Park<br><br>The Council should look on this requirement as a golden opportunity to build Affordable Housing on the derelict Kleeneze site at Hanham and the many Brownfield sites in Kingswood. Not so profitable for the developers! but an opportunity to clear up these terrible sites with little additional infrastructure required. It's about time that the rundown derelict Kingswood High Street got some serious attention. Planning is not just about throwing up more and more houses in our precious green spaces. It should look to reducing pollution, removing the requirement for private transport and concentration on Public Transport services. How about a tram system along the old East Bristol to Bath Railway Line? Clever Planning should have a zero or negative effect on the use of private vehicles. Houses should be built close to or in easy reach of centres of employment not in an area made into a Green Belt to prevent urban sprawl.<br><br>Are we to see more and more development until all our green spaces are gone? It has been proved that these spaces are extremely impotent for both physical and mental wellbeing. These green spaces are the barriers to the pollution that is already far too high in parts of South Gloucestershire. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Paul Chapman - Iron Acton Parish Council |
| **Comment ID** | 19809537/552 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **(a) Engagement with Local Councils:**<br><br>Before the next stage of producing the new Local Plan South Gloucestershire should tap into local knowledge in Iron Acton about the significance locally of particular sites and areas, their sustainability, land ownership, historic or ecological value etc. This should be a genuine reaching-out to local people rather than simply general "drop-in" events. This would be consistent with the spirit of the South Gloucestershire Statement of Community Involvement and alert the Authority to issues of particular local sensitivity or concern.<br><br>**(b) M4 Junction 18A:**<br><br>The decision in March 2018 by South Gloucestershire Cabinet Members to recommend the Lyde Green option for the new Junction 18A on the M4 following the public Consultation in 2017 means that Highways England is now in a position to make a firm recommendation to the Department for Transport on its location. The new Junction should include a link to Yate. It would change significantly the relative sustainability of different locations in the Yate/Chipping Sodbury area. This should be taken into account in the new Local Plan and in the Joint Spatial Plan. Failure to do so will undermine both Plans and render them unsound.<br><br>**(c) General Approach Proposed for the Local Plan:**<br><br>I agree that the starting point should be the completion of existing, agreed Core Strategy developments in South Gloucestershire, and that priority should be given to urban renewal and maximising the use of Brownfield land in Yate/Chipping Sodbury in order to minimise loss of Greenfield land. This would include proceeding with the North Yate New Neighbourhood which would provide up to 3,000 new homes for Yate.<br><br>Although it is 12 years since the North Yate New Neighbourhood was agreed nothing has been built. This means that there is no justification for the further proposal for 2,000 homes in the neighbouring North West Yate location. North West Yate should not proceed in the absence of clear evidence that there is a demand for another 4,000 homes in the Yate, Chipping Sodbury and Coalpit Heath area. Over-supply of development sites will simply encourage developers to cherry-pick the easiest ones resulting in a piecemeal approach rather than the "master-planning" South Gloucestershire says it wants.<br><br>I also object strongly to siting the proposed North West Yate development in the Iron Acton Green Belt without demonstrating the "exceptional circumstances" required by National Guidance. No justification is given in the Draft Joint Spatial Plan and it appears that no justification will be given in the new Local Plan. So how will the national requirements be demonstrated? South Gloucestershire should rethink. If it has to identify sites for major new development additional to North Yate they should be in areas close to the new M4 Junction 18A, rather than in Iron Acton (which is separated from it by a line, the River Frome and unspoilt Green Belt).<br><br>**(d) Design of New Development:**<br><br>I welcome South Gloucestershire's commitment to a "master-planning" approach to strategic developments "in Consultation with local and community interests" and to setting out clearly exactly where it proposes new development should occur. But in villages and other non-urban settlements the design of smaller, non-strategic developments is just as important. This includes paying close attention to the shape, scale and appearance of development to ensure it sits harmoniously within its context. Historic England has pointed out that from Roman times buildings in the West of England have used local stone and other materials giving a characteristic look and feel to our historic settlements. In Iron Acton local |

| | |
|---|---|
| | pennant stone was the most commonly used material along with oak structural timbers. Even the name, Iron Acton, means village of oak. This "local vernacular" should be reflected in the design of any new developments, large or small, in Iron Acton Parish.<br><br>I do not agree that the proposed North West Yate development, if it goes ahead, should have a "modernist" feel to match the post 1960's housing in Yate. Even though it is referred to as North West Yate it would be effectively a separate neighbourhood in Iron Acton separated from Yate by the industrial areas East of the Yate Road/Armstrong Way roundabout. If it is to go ahead despite the overwhelming opposition of local people it should at least be designed with reference to local historic building traditions so that the existing beautiful pennant stone buildings and walls in the area are not overwhelmed and turned into historical anomalies by a "modernist" aesthetic.<br><br>I share South Gloucestershire's view that no development should be begun without predelivery of essential infrastructure. In Iron Acton Parish that would include increasing transport capacity to avoid worsening the existing congestion and lorry blight on the B4058 Wotton/Bristol Road, and B4059 Yate/Latteridge Road. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Paul Chapman - Iron Acton Parish Council |
| **Comment ID** | 19809537/553 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **SDL - Yate:**<br><br>**Urban Localities – Yate:**<br><br>I welcome the proposed "whole town" approach to future planning for Yate but do not support the inclusion of the proposed North West Yate Strategic Development Location in this. In the absence of credible evidence that the Yate/Chipping Sodbury/Coalpit Heath area needs the proposed 50% increase in housing stock (over 20 years, meaning an unprecedented 2.5% average annual population increase), and in the absence of credible evidence that building in the Green Belt is justified and the most sustainable option, the North West Yate proposal should not proceed.<br><br>I support the suggested "Western Gateway" around Yate Railway Station and the aim of more intensive and mixed use of the employment areas within the Parish (in particular the Industrial Estates East of the Yate/Armstrong Road Roundabout). As part of this steps should be taken to reduce the impact of heavy goods traffic on homes on the B4058 Wotton/Bristol Road and the B4059 ate/Latteridge Road, principally by supporting proposals for the new M4 Junction 18A and encouraging heavy goods vehicles to use that route. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David Hatherell |
| **Comment ID** | 19830849/567 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **(a) Engagement with Local Councils:**<br><br>Before the next stage of producing the new Local Plan South Gloucestershire should tap into local knowledge in Iron Acton about the significance locally of particular sites and areas, their sustainability, land ownership, historic or ecological value etc. This should be a genuine reaching-out to local people rather than simply general "drop-in" events. This would be consistent with the spirit of the South Gloucestershire Statement of Community Involvement and alert the Authority to issues of particular local sensitivity or concern.<br><br>**(b) M4 Junction 18A:**<br><br>The decision in March 2018 by South Gloucestershire Cabinet Members to recommend the Lyde Green option for the new Junction 18A on the M4 following the public Consultation in 2017 means that Highways England is now in a position to make a firm recommendation to the Department for Transport on its location. The new Junction should include a link to Yate. It would change significantly the relative sustainability of different locations in the Yate/Chipping Sodbury area. This should be taken into account in the new Local Plan and in the Joint Spatial Plan. Failure to do so will undermine both Plans and render them unsound.<br><br>**(c) General Approach Proposed for the Local Plan:**<br><br>I agree that the starting point should be the completion of existing, agreed Core Strategy developments in South Gloucestershire, and that priority should be given to urban renewal and maximising the use of Brownfield land in Yate/Chipping Sodbury in order to minimise loss of Greenfield land. This would include proceeding with the North Yate New Neighbourhood which would provide up to 3,000 new homes for Yate.<br><br>Although it is 12 years since the North Yate New Neighbourhood was agreed nothing has been built. This means that there is no justification for the further proposal for 2,000 homes in the neighbouring North West Yate location. North West Yate should not proceed in the absence of clear evidence that there is a demand for another 4,000 homes in the Yate, Chipping Sodbury and Coalpit Heath area. Over-supply of development sites will simply encourage developers to cherry-pick the easiest ones resulting in a piecemeal approach rather than the "master-planning" South Gloucestershire says it wants.<br><br>I also object strongly to siting the proposed North West Yate development in the Iron Acton Green Belt without demonstrating the "exceptional circumstances" required by National Guidance. No justification is given in the Draft Joint Spatial Plan and it appears that no justification will be |

| | |
|---|---|
| | given in the new Local Plan. So how will the national requirements be demonstrated? South Gloucestershire should rethink. If it has to identify sites for major new development additional to North Yate they should be in areas close to the new M4 Junction 18A, rather than in Iron Acton (which is separated from it by a railway line, the River Frome and unspoilt Green Belt).<br><br>**(d) Design of New Development:**<br><br>I welcome South Gloucestershire's commitment to a "master-planning" approach to strategic developments "in Consultation with local and community interests" and to setting out clearly exactly where it proposes new development should occur. But in villages and other non-urban settlements the design of smaller, non-strategic developments is just as important. This includes paying close attention to the shape, scale and appearance of development to ensure it sits harmoniously within its context. Historic England has pointed out that from Roman times buildings in the West of England have used local stone and other materials giving a characteristic look and feel to our historic settlements. In Iron Acton local pennant stone was the most commonly used material along with oak structural timbers. Even the name, Iron Acton, means village of oak. This "local vernacular" should be reflected in the design of any new developments, large or small, in Iron Acton Parish.<br><br>I do not agree that the proposed North West Yate development, if it goes ahead, should have a "modernist" feel to match the post 1960's housing in Yate. Even though it is referred to as North West Yate it would be effectively a separate neighbourhood in Iron Acton separated from Yate by the industrial areas East of the Yate Road/Armstrong Way roundabout. If it is to go ahead despite the overwhelming opposition of local people it should at least be designed with reference to local historic building traditions so that the existing beautiful pennant stone buildings and walls in the area are not overwhelmed and turned into historical anomalies by a "modernist" aesthetic.<br><br>I share South Gloucestershire's view that no development should be begun without pre-delivery of essential infrastructure. In Iron Acton Parish that would include increasing transport capacity to avoid worsening the existing congestion and lorry blight on the B4058 Wotton/Bristol Road, and B4059 Yate/Latteridge Road. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David Hatherell |
| **Comment ID** | 19830849/568 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | SDL - Yate:<br><br>**Urban Localities – Yate:**<br><br>I welcome the proposed "whole town" approach to future planning for Yate but do not support the inclusion of the proposed North West Yate Strategic Development Location in this. In the absence of credible evidence that the Yate/Chipping Sodbury/Coalpit Heath area needs the proposed 50% increase in housing stock (over 20 years, meaning an unprecedented 2.5% average annual population increase), and in the absence of credible evidence that building in the Green Belt is justified and the most sustainable option, the North West Yate proposal should not proceed.<br><br>I support the suggested "Western Gateway" around Yate Railway Station and the aim of more intensive and mixed use of the employment areas within the Parish (in particular the Industrial Estates East of the Yate/Armstrong Road Roundabout). As part of this steps should be taken to reduce the impact of heavy goods traffic on homes on the B4058 Wotton/Bristol Road and the B4059 Yate/Latteridge Road, principally by supporting proposals for the new M4 Junction 18A and encouraging heavy goods vehicles to use that route. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | John O'Donnell |
| **Comment ID** | 18604385/578 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **(a) Engagement with Local Councils:**<br><br>Before the next stage of producing the new Local Plan, South Gloucestershire should tap into local knowledge in Iron Acton about the significance locally of particular sites and areas, their sustainability, land ownership, historic or ecological value etc. This should be a genuine reaching-out to local people rather than simply general "drop-in" events. This would be consistent with the spirit of the South Gloucestershire Statement of Community Involvement and alert the Authority to issues of particular local sensitivity or concern.<br><br>**(b) M4 Junction 18A:**<br><br>The decision in March 2018 by South Gloucestershire Cabinet Members to recommend the Lyde Green option for the new Junction 18A on the M4 following the public Consultation in 2017 means that Highways England is now in a position to make a firm recommendation to the Department for Transport on its location. The new Junction should include a link to Yate. It would change significantly the relative sustainability of different locations in the Yate/Chipping Sodbury area. This should be taken into account in the new Local Plan and in the Joint Spatial Plan. Failure to do so will undermine both Plans and render them unsound.<br><br>**(c) General Approach Proposed for the Local Plan:** |

| | |
|---|---|
| | I agree that the starting point should be the completion of existing, agreed Core Strategy developments in South Gloucestershire, and that priority should be given to urban renewal and maximising the use of Brownfield land in Yate/Chipping Sodbury in order to minimise loss of Greenfield land. This would include proceeding with the North Yate New Neighbourhood which would provide up to 3,000 new homes for Yate.<br><br>Although it is 12 years since the North Yate New Neighbourhood was agreed nothing has been built. This means that there is no justification for the further proposal for 2,000 homes in the neighbouring North West Yate location. North West Yate should not proceed in the absence of clear evidence that there is a demand for another 4,000 homes in the Yate, Chipping Sodbury and Coalpit Heath area. Over-supply of development sites will simply encourage developers to cherry-pick the easiest ones resulting in a piecemeal approach rather than the "master-planning" South Gloucestershire says it wants.<br><br>I also object strongly to siting the proposed North West Yate development in the Iron Acton Green Belt without demonstrating the "exceptional circumstances" required by National Guidance. No justification is given in the Draft Joint Spatial Plan and it appears that no justification will be given in the new Local Plan. So how will the national requirements be demonstrated? South Gloucestershire should rethink. If it has to identify sites for major new development additional to North Yate they should be in areas close to the new M4 Junction 18A, rather than in Iron Acton (which is separated from it by a railway line, the River Frome and unspoilt Green Belt).<br><br>**(d) Design of New Development:**<br><br>I welcome South Gloucestershire's commitment to a "master-planning" approach to strategic developments "in Consultation with local and community interests" and to setting out clearly exactly where it proposes new development should occur. But in villages and other non-urban settlements the design of smaller, non-strategic developments is just as important. This includes paying close attention to the shape, scale and appearance of development to ensure it sits harmoniously within its context. Historic England has pointed out that from Roman times buildings in the West of England have used local stone and other materials giving a characteristic look and feel to our historic settlements. In Iron Acton local pennant stone was the most commonly used material along with oak structural timbers. Even the name, Iron Acton, means village of oak. This "local vernacular" should be reflected in the design of any new developments, large or small, in Iron Acton Parish.<br><br>I do not agree that the proposed North West Yate development, if it goes ahead, should have a "modernist" feel to match the post 1960's housing in Yate. Even though it is referred to as North West Yate it would be effectively a separate neighbourhood in Iron Acton separated from Yate by the industrial areas East of the Yate Road/Armstrong Way roundabout. If it is to go ahead despite the overwhelming opposition of local people it should at least be designed with reference to local historic building traditions so that the existing beautiful pennant stone buildings and walls in the area are not overwhelmed and turned into historical anomalies by a "modernist" aesthetic.<br><br>I share South Gloucestershire's view that no development should be begun without pre-delivery of essential infrastructure. In Iron Acton Parish that would include increasing transport capacity to avoid worsening the existing congestion and lorry blight on the B4058 Wotton/Bristol Road, and B4059 Yate/Latteridge Road. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | John O'Donnell |
| **Comment ID** | 18604385/579 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | SDL - Yate:<br><br>**Urban Localities – Yate:**<br><br>I welcome the proposed "whole town" approach to future planning for Yate but do not support the inclusion of the proposed North West Yate Strategic Development Location in this. In the absence of credible evidence that the Yate/Chipping Sodbury/Coalpit Heath area needs the proposed 50% increase in housing stock (over 20 years, meaning an unprecedented 2.5% average annual population increase), and in the absence of credible evidence that building in the Green Belt is justified and the most sustainable option, the North West Yate proposal should not proceed.<br><br>I support the suggested "Western Gateway" around Yate Railway Station and the aim of more intensive and mixed use of the employment areas within the Parish (in particular the Industrial Estates East of the Yate/Armstrong Road Roundabout). As part of this steps should be taken to reduce the impact of heavy goods traffic on homes on the B4058 Wotton/Bristol Road and the B4059 Yate/Latteridge Road, principally by supporting proposals for the new M4 Junction 18A and encouraging heavy goods vehicles to use that route. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Joseph Hatherell |
| **Comment ID** | 19831681/589 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **(a) Engagement with Local Councils:**<br><br>Before the next stage of producing the new Local Plan South Gloucestershire should tap into local knowledge in Iron Acton about the significance locally of particular sites and areas, their sustainability, land ownership, historic or ecological value etc. This should be a genuine reaching-out to local people rather than simply general "drop-in" events. This would be consistent with the spirit of the South Gloucestershire Statement of Community Involvement and alert the Authority to issues of particular local sensitivity or concern.<br><br>**(b) M4 Junction 18A:** |

| | |
|---|---|
| | The decision in March 2018 by South Gloucestershire Cabinet Members to recommend the Lyde Green option for the new Junction 18A on the M4 following the public Consultation in 2017 means that Highways England is now in a position to make a firm recommendation to the Department for Transport on its location. The new Junction should include a link to Yate. It would change significantly the relative sustainability of different locations in the Yate/Chipping Sodbury area. This should be taken into account in the new Local Plan and in the Joint Spatial Plan. Failure to do so will undermine both Plans and render them unsound.<br><br>**(c) General Approach Proposed for the Local Plan:**<br><br>I agree that the starting point should be the completion of existing, agreed Core Strategy developments in South Gloucestershire, and that priority should be given to urban renewal and maximising the use of Brownfield land in Yate/Chipping Sodbury in order to minimise loss of Greenfield land. This would include proceeding with the North Yate New Neighbourhood which would provide up to 3,000 new homes for Yate.<br><br>Although it is 12 years since the North Yate New Neighbourhood was agreed nothing has been built. This means that there is no justification for the further proposal for 2,000 homes in the neighbouring North West Yate location. North West Yate should not proceed in the absence of clear evidence that there is a demand for another 4,000 homes in the Yate, Chipping Sodbury and Coalpit Heath area. Over-supply of development sites will simply encourage developers to cherry-pick the easiest ones resulting in a piecemeal approach rather than the “master-planning” South Gloucestershire says it wants.<br><br>I also object strongly to siting the proposed North West Yate development in the Iron Acton Green Belt without demonstrating the “exceptional circumstances” required by National Guidance. No justification is given in the Draft Joint Spatial Plan and it appears that no justification will be given in the new Local Plan. So how will the national requirements be demonstrated? South Gloucestershire should rethink. If it has to identify sites for major new development additional to North Yate they should be in areas close to the new M4 Junction 18A, rather than in Iron Acton (which is separated from it by a railway line, the River Frome and unspoilt Green Belt).<br><br>**(d) Design of New development:**<br><br>I welcome South Gloucestershire’s commitment to a “master-planning” approach to strategic developments “in Consultation with local and community interests” and to setting out clearly exactly where it proposes new development should occur. But in villages and other non-urban settlements the design of smaller, non-strategic developments is just as important. This includes paying close attention to the shape, scale and appearance of development to ensure it sits harmoniously within its context. Historic England has pointed out that from Roman times buildings in the West of England have used local stone and other materials giving a characteristic look and feel to our historic settlements. In Iron Acton local pennant stone was the most commonly used material along with oak structural timbers. Even the name, Iron Acton, means village of oak. This “local vernacular” should be reflected in the design of any new developments, large or small, in Iron Acton Parish.<br><br>I do not agree that the proposed North West Yate development, if it goes ahead, should have a “modernist” feel to match the post 1960's housing in Yate. Even though it is referred to as North West Yate it would be effectively a separate neighbourhood in Iron Acton separated from Yate by the industrial areas East of the Yate Road/Armstrong Way roundabout. If it is to go ahead despite the overwhelming opposition of local people it should at least be designed with reference to local historic building traditions so that the existing beautiful pennant stone buildings and walls in the area are not overwhelmed and turned into historical anomalies by a ”modernist” aesthetic.<br><br>I share South Gloucestershire’s view that no development should be begun without pre-delivery of essential infrastructure. In Iron Acton Parish that would include increasing transport capacity to avoid worsening the existing congestion and lorry blight on the B4058 Wotton/Bristol Road, and B4059 Yate/Latteridge Road. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Joseph Hatherell |
| **Comment ID** | 19831681/590 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | SDL - Yate:<br><br>**Urban Localities – Yate:**<br><br>I welcome the proposed “whole town” approach to future planning for Yate but do not support the inclusion of the proposed North West Yate Strategic Development Location in this. In the absence of credible evidence that the Yate/Chipping Sodbury/Coalpit Heath area needs the proposed 50% increase in housing stock (over 20 years, meaning an unprecedented 2.5% average annual population increase), and in the absence of credible evidence that building in the Green Belt is justified and the most sustainable option, the North West Yate proposal should not proceed.<br><br>I support the suggested “Western Gateway” around Yate Railway Station and the aim of more intensive and mixed use of the employment areas within the Parish (in particular the Industrial Estates East of the Yate/Armstrong Road Roundabout). As part of this steps should be taken to reduce the impact of heavy goods traffic on homes on the B4058 Wotton/Bristol Road and the B4059 Yate/Latteridge Road, principally by supporting proposals for the new M4 Junction 18A and encouraging heavy goods vehicles to use that route. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Karen Longden |
| **Comment ID** | 19831809/610 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **(a) Engagement with Local Councils:**<br><br>South Gloucestershire Council should obtain local knowledge of Iron Acton specifically about the historical value of existing properties and land, including the history of land ownership. Suggestions are being made by people who have little or no knowledge of the local areas and their historical value. Local people should have been and should be included before the next stage of Local Plan is produced.<br><br>**(b) General Approach Proposed for the Local Plan:**<br><br>The completion of the existing agreed Core Strategy developments in South Gloucestershire should be implemented and priority should be given to maximising the use of Brownfield land in Yate and Chipping Sodbury in order to minimise loss of Greenfield land. This would include proceeding with the North Yate New Neighbourhood which would provide up to 3,000 new homes for Yate.<br><br>It has been 12 years since the North Yate New Neighbourhood was agreed and nothing has been built. If this hasn't been completed how can there be any justification for the further proposal for 2,000 homes in the neighbouring North West Yate location? We obviously don't need the extra development in the area if the North Yate New Neighbourhood hasn't been completed after 12 years of approval.<br><br>I strongly object to the proposed North West Yate development in the Iron Acton Green Belt without demonstrating the "exceptional circumstances" required by National Guidance. No justification is given in the Draft Joint Spatial Plan and it appears that no justification will be given in the new Local Plan. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Karen Longden |
| **Comment ID** | 19831809/611 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | SDL - Yate:<br><br>**Urban Localities – Yate:**<br><br>I do not support the inclusion of the proposed North West Yate Strategic Development Location in the "whole town" approach. There is no evidence that the Yate, Chipping Sodbury, Coalpit Heath area needs the proposed increase in housing stock and there is no evidence that building in the Green Belt is justified and the most sustainable option, the North West Yate proposal should not proceed. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Carol & Derek Haycock |
| **Comment ID** | 19831841/617 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | SGJSPTESS095:<br><br>Re: Call for Sites in Hanham, we wish to object to any Application to build on Hanham Club Cricket Ground, Gover Road, or Hanham Hills. This would be a great loss of amenity for the local community now and in the future. More housing would mean an increase in pollution, congestion and a loss of amenities that all are able to enjoy now. South Gloucestershire Council should follow the lead of BANES and plant copses on and around Hanham Hills to purify the air from the excessive traffic. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Jane Driver |
| **Comment ID** | 5134785/622 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **(a) Engagement with Local Councils:**<br><br>Before the next stage of producing the new Local Plan South Gloucestershire should tap into local knowledge in Iron Acton about the significance locally of particular sites and areas, their sustainability, land ownership, historic or ecological value etc. This should be a genuine reaching-out to local people rather than simply general "drop-in" events. This would be consistent with the spirit of the South Gloucestershire Statement of Community Involvement and alert the Authority to issues of particular local sensitivity or concern. |

| | |
|---|---|
| | **(b) M4 Junction 18A:**<br><br>The decision in March 2018 by South Gloucestershire Cabinet Members to recommend the Lyde Green option for the new Junction 18A on the M4 following the public Consultation in 2017 means that Highways England is now in a position to make a firm recommendation to the Department for Transport on its location. The new Junction should include a link to Yate. It would change significantly the relative sustainability of different locations in the Yate/Chipping Sodbury area. This should be taken into account in the new Local Plan and in the Joint Spatial Plan. Failure to do so will undermine both Plans and render them unsound.<br><br>**(c) General Approach Proposed for the Local Plan:**<br><br>I agree that the starting point should be the completion of existing, agreed Core Strategy developments in South Gloucestershire, and that priority should be given to urban renewal and maximising the use of Brownfield land in Yate/Chipping Sodbury in order to minimise loss of Greenfield land. This would include proceeding with the North Yate New Neighbourhood which would provide up to 3,000 new homes for Yate.<br><br>Although it is 12 years since the North Yate New Neighbourhood was agreed nothing has been built. This means that there is no justification for the further proposal for 2,000 homes in the neighbouring North West Yate location. North West Yate should not proceed in the absence of clear evidence that there is a demand for another 4,000 homes in the Yate, Chipping Sodbury and Coalpit Heath area. Over-supply of development sites will simply encourage developers to cherry-pick the easiest ones resulting in a piecemeal approach rather than the "master-planning" South Gloucestershire says it wants.<br><br>I also object strongly to siting the proposed North West Yate development in the Iron Acton Green Belt without demonstrating the "exceptional circumstances" required by National Guidance. No justification is given in the Draft Joint Spatial Plan and it appears that no justification will be given in the new Local Plan. So how will the national requirements be demonstrated? South Gloucestershire should rethink. If it has to identify sites for major new development additional to North Yate they should be in areas close to the new M4 Junction 18A, rather than in Iron Acton (which is separated from it by a railway line, the River Frome and unspoilt Green Belt).<br><br>**(d) Design of New Development:**<br><br>I welcome South Gloucestershire's commitment to a "master-planning" approach to strategic developments "in Consultation with local and community interests" and to setting out clearly exactly where it proposes new development should occur. But in villages and other non-urban settlements the design of smaller, non-strategic developments is just as important. This includes paying close attention to the shape, scale and appearance of development to ensure it sits harmoniously within its context. Historic England has pointed out that from Roman times buildings in the West of England have used local stone and other materials giving a characteristic look and feel to our historic settlements. In Iron Acton local pennant stone was the most commonly used material along with oak structural timbers. Even the name, Iron Acton, means village of oak. This "local vernacular" should be reflected in the design of any new developments, large or small, in Iron Acton Parish.<br><br>I do not agree that the proposed North West Yate development, if it goes ahead, should have a "modernist" feel to match the post 1960's housing in Yate. Even though it is referred to as North West Yate it would be effectively a separate neighbourhood in Iron Acton separated from Yate by the industrial areas East of the Yate Road/Armstrong Way roundabout. If it is to go ahead despite the overwhelming opposition of local people it should at least be designed with reference to local historic building traditions so that the existing beautiful pennant stone buildings and walls in the area are not overwhelmed and turned into historical anomalies by a "modernist" aesthetic.<br><br>I share South Gloucestershire's view that no development should be begun without pre-delivery of essential infrastructure. In Iron Acton Parish that would include increasing transport capacity to avoid worsening the existing congestion and lorry blight on the B4058 Wotton/Bristol Road, and B4059 Yate/Latteridge Road. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Jane Driver |
| **Comment ID** | 5134785/623 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | SDL - Yate:<br><br>**Urban Localities – Yate:**<br><br>I welcome the proposed "whole town" approach to future planning for Yate but do not support the inclusion of the proposed North West Yate Strategic Development Location in this. In the absence of credible evidence that the Yate/Chipping Sodbury/Coalpit Heath area needs the proposed 50% increase in housing stock (over 20 years, meaning an unprecedented 2.5% average annual population increase), and in the absence of credible evidence that building in the Green Belt is justified and the most sustainable option, the North West Yate proposal should not proceed.<br><br>I support the suggested "Western Gateway" around Yate Railway Station and the aim of more intensive and mixed use of the employment areas within the Parish (in particular the Industrial Estates East of the Yate/Armstrong Road Roundabout). As part of this steps should be taken to reduce the impact of heavy goods traffic on homes on the B4058 Wotton/Bristol Road and the B4059 Yate/Latteridge Road, principally by supporting proposals for the new M4 Junction 18A and encouraging heavy goods vehicles to use that route. |

| | |
|---|---|
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Diana Porter-Smith |
| **Comment ID** | 10874433/633 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **(a) Engagement with Local Councils:**<br><br>Before the next stage of producing the new Local Plan South Gloucestershire should tap into local knowledge in Iron Acton about the significance locally of particular sites and areas, their sustainability, land ownership, historic or ecological value etc. This should be a genuine reaching-out to local people rather than simply general "drop-in" events. This would be consistent with the spirit of the South Gloucestershire Statement of Community Involvement and alert the Authority to issues of particular local sensitivity or concern.<br><br>**(b) M4 Junction 18A:**<br><br>The decision in March 2018 by South Gloucestershire Cabinet Members to recommend the Lyde Green option for the new Junction 18A on the M4 following the public Consultation in 2017 means that Highways England is now in a position to make a firm recommendation to the Department for Transport on its location. The new Junction should include a link to Yate. It would change significantly the relative sustainability of different locations in the Yate/Chipping Sodbury area. This should be taken into account in the new Local Plan and in the Joint Spatial Plan. Failure to do so will undermine both Plans and render them unsound.<br><br>**(c) General Approach Proposed for the Local Plan:**<br><br>I agree that the starting point should be the completion of existing, agreed Core Strategy developments in South Gloucestershire, and that priority should be given to urban renewal and maximising the use of Brownfield land in Yate/Chipping Sodbury in order to minimise loss of Greenfield land. This would include proceeding with the North Yate New Neighbourhood which would provide up to 3,000 new homes for Yate.<br><br>Although it is 12 years since the North Yate New Neighbourhood was agreed nothing has been built. This means that there is no justification for the further proposal for 2,000 homes in the neighbouring North West Yate location. North West Yate should not proceed in the absence of clear evidence that there is a demand for another 4,000 homes in the Yate, Chipping Sodbury and Coalpit Heath area. Over-supply of development sites will simply encourage developers to cherry-pick the easiest ones resulting in a piecemeal approach rather than the "master-planning" South Gloucestershire says it wants.<br><br>I also object strongly to siting the proposed North West Yate development in the Iron Acton Green Belt without demonstrating the "exceptional circumstances" required by national guidance. No justification is given in the Draft Joint Spatial Plan and it appears that no justification will be given in the new Local Plan. So how will the national requirements be demonstrated? South Gloucestershire should rethink. If it has to identify sites for major new development additional to North Yate they should be in areas close to the new M4 Junction 18A, rather than in Iron Acton (which is separated from it by a railway line, the River Frome and unspoilt Green Belt).<br><br>**(d) Design of New Development:**<br><br>I welcome South Gloucestershire's commitment to a "master-planning" approach to strategic developments "in Consultation with local and community interests" and to setting out clearly exactly where it proposes new development should occur. But in villages and other non-urban settlements the design of smaller, non-strategic developments is just as important. This includes paying close attention to the shape, scale and appearance of development to ensure it sits harmoniously within its context. Historic England has pointed out that from Roman times buildings in the West of England have used local stone and other materials giving a characteristic look and feel to our historic settlements. In Iron Acton local pennant stone was the most commonly used material along with oak structural timbers. Even the name, Iron Acton, means village of oak. This "local vernacular" should be reflected in the design of any new developments, large or small, in Iron Acton Parish.<br><br>I do not agree that the proposed North West Yate development, if it goes ahead, should have a "modernist" feel to match the post 1960's housing in Yate. Even though it is referred to as North West Yate it would be effectively a separate neighbourhood in Iron Acton separated from Yate by the industrial areas East of the Yate Road/Armstrong Way roundabout. If it is to go ahead despite the overwhelming opposition of local people it should at least be designed with reference to local historic building traditions so that the existing beautiful pennant stone buildings and walls in the area are not overwhelmed and turned into historical anomalies by a "modernist" aesthetic.<br><br>I share South Gloucestershire's view that no development should be begun without pre-delivery of essential infrastructure. In Iron Acton Parish that would include increasing transport capacity to avoid worsening the existing congestion and lorry blight on the B4058 Wotton/Bristol Road, and B4059 Yate/Latteridge Road. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Diana Porter-Smith |
| **Comment ID** | 10874433/634 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | SDL - Yate: |

| | |
|---|---|
| | **Urban Localities – Yate:**<br><br>I welcome the proposed "whole town" approach to future planning for Yate but do not support the inclusion of the proposed North West Yate Strategic Development Location in this. In the absence of credible evidence that the Yate/Chipping Sodbury/Coalpit Heath area needs the proposed 50% increase in housing stock (over 20 years, meaning an unprecedented 2.5% average annual population increase), and in the absence of credible evidence that building in the Green Belt is justified and the most sustainable option, the North West Yate proposal should not proceed.<br><br>I support the suggested "Western Gateway" around Yate Railway Station and the aim of more intensive and mixed use of the employment areas within the Parish (in particular the Industrial Estates East of the Yate/Armstrong Road Roundabout). As part of this steps should be taken to reduce the impact of heavy goods traffic on homes on the B4058 Wotton/Bristol Road and the B4059 Yate/Latteridge Road, principally by supporting proposals for the new M4 Junction 18A and encouraging heavy goods vehicles to use that route. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Michael Keenan |
| **Comment ID** | 2796353/645 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **(a) Engagement with Local Councils:**<br><br>I have found it difficult to provide feedback on the Local Plan because there is so little detail to be able to make this Consultation valid. I have personally attended a number of different SGC Consultations, none of which were able to provide the level of detail I feel is necessary to allow local people to Comment on the proposals. Even when questioning SGC Officials at these events, they themselves have confirmed there are no clear Plans of where the proposed housing, employment, transport links and/or infrastructure will sit. It seems the Plans are very vague and only outline where possible development may end up. I therefore feel the information provided is inadequate.<br><br>I also feel that SGC have attempted to conceal the JSP proposals for the strategic sites by labelling the Parish of Iron Acton, including Engine Common & Nibley as 'North West Yate.' Describing this area as North West Yate is not recognised by residents as it is not an accurate description for the area SGC have circled in the JSP therefore making this Consultation flawed.<br><br>Before the next stage of producing the new Local Plan South Gloucestershire should tap into local knowledge in Iron Acton & Engine Common about the significance locally of sites and areas, their sustainability, land ownership, historic or ecological value etc. This should be a genuine reaching-out to local people rather than simply general "drop-in" events. This would be consistent with the spirit of the South Gloucestershire Statement of Community Involvement and alert the Authority to issues of particular local sensitivity or concern.<br><br>I would also like to point to previous Planning Applications which were rejected by SGC over the past 8 years in respect of unsuccessful development Applications for the land between Dyers Lane, Mission Road and the North Road, Engine Common. Local residents have responded numerous times over the years in an attempt to protect our green spaces, local habitat, the character and feel of the area and highlight serious drainage issues due to the perched water table. I would strongly encourage SGC to re-visit these Comments and include these as valid Representations as part of the Local Plan Consultation as despite the Plans being vague, it is clear that either by virtue of the JSP strategic sites or the non-strategic sites that SGC is determined to build in this area one way or another.<br><br>**(b) M4 Junction 18A:**<br><br>The decision in March 2018 by South Gloucestershire Cabinet Members to recommend the Lyde Green option for the new Junction 18A on the M4 following the public Consultation in 2017 means that Highways England is now in a position to make a firm recommendation to the Department for Transport on its location. The new Junction should include a link to Yate. It would change significantly the relative sustainability of different locations in the Yate/Chipping Sodbury area. This should be taken into account in the new Local Plan and in the Joint Spatial Plan. Failure to do so will undermine both Plans and render them unsound.<br><br>**(c) General Approach Proposed for the Local Plan:**<br><br>I agree that the starting point should be the completion of existing, agreed Core Strategy developments in South Gloucestershire, and that priority should be given to urban renewal and maximising the use of Brownfield land in Yate/Chipping Sodbury in order to minimise loss of Greenfield land. This would include proceeding with the North Yate New Neighbourhood which would provide up to 3,000 new homes for Yate.<br><br>Although it is 12 years since the North Yate New Neighbourhood was agreed nothing has been built. This means that there is no justification for the further proposal for 2,000 homes in the neighbouring North West Yate location. North West Yate should not proceed in the absence of clear evidence that there is a demand for another 4,000 homes in the Yate, Chipping Sodbury and Coalpit Heath area. Over-supply of development sites will simply encourage developers to cherry-pick the easiest ones resulting in a piecemeal approach rather than the "master-planning" South Gloucestershire says it wants.<br><br>I also object strongly to siting the proposed North West Yate development in the Iron Acton Green Belt without demonstrating the "exceptional circumstances" required by National Guidance. No justification is given in the Draft Joint Spatial Plan and it appears that no justification will be given in the new Local Plan. So how will the national requirements be demonstrated? South Gloucestershire should rethink. If it has to identify sites for major new development additional to North Yate they should be in areas close to the new M4 Junction 18A, rather than in Iron Acton & Engine Common (which is separated from it by a railway line, the River Frome and unspoilt Green Belt).<br><br>**(d) Design of New Development:** |

| | |
|---|---|
| | I welcome South Gloucestershire's commitment to a "master-planning" approach to strategic developments "in Consultation with local and community interests" and to setting out clearly exactly where it proposes new development should occur. But in villages and other non-urban settlements the design of smaller, non-strategic developments is just as important. This includes paying close attention to the shape, scale and appearance of development to ensure it sits harmoniously within its context. Historic England has pointed out that from Roman times buildings in the West of England have used local stone and other materials giving a characteristic look and feel to our historic settlements. In Iron Acton local pennant stone was the most commonly used material along with oak structural timbers. Even the name, Iron Acton, means village of oak. This "local vernacular" should be reflected in the design of any new developments, large or small, in Iron Acton Parish.<br><br>I do not agree that the proposed North West Yate development, if it goes ahead, should have a "modernist" feel to match the post 1960's housing in Yate. Even though it is referred to as North West Yate it would effectively be a separate neighbourhood in Iron Acton/Engine Common separated from Yate by the industrial areas East of the Yate Road/Armstrong Way roundabout. If it is to go ahead despite the overwhelming opposition of local people it should at least be designed with reference to local historic building traditions so that the existing beautiful pennant stone buildings and walls in the area are not overwhelmed and turned into historical anomalies by a "modernist" aesthetic.<br><br>I share South Gloucestershire's view that no development should be begun without pre-delivery of essential infrastructure. In Iron Acton Parish that would include increasing transport capacity to avoid worsening the existing congestion and lorry blight on the B4058 Wotton/Bristol Road, and B4059 Yate/Latteridge Road. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Michael Keenan |
| **Comment ID** | 2796353/646 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | SDL - Yate:<br><br>**Urban Localities – Yate:**<br><br>I welcome the proposed "whole town" approach to future planning for Yate but do not support the inclusion of the proposed North West Yate Strategic Development Location in this. In the absence of credible evidence that the Yate/Chipping Sodbury/Coalpit Heath area needs the proposed 50% increase in housing stock (over 20 years, meaning an unprecedented 2.5% average annual population increase), and in the absence of credible evidence that building in the Green Belt is justified and the most sustainable option, the North West Yate proposal should not proceed.<br><br>I support the suggested "Western Gateway" around Yate Railway Station and the aim of more intensive and mixed use of the employment areas within the Parish (in particular the Industrial Estates East of the Yate/Armstrong Road Roundabout). As part of this steps should be taken to reduce the impact of heavy goods traffic on homes on the B4058 Wotton/Bristol Road and the B4059 Yate/Latteridge Road, principally by supporting proposals for the new M4 Junction 18A and encouraging heavy goods vehicles to use that route. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Welbeck Strategic Land LLP |
| **Comment ID** | 19840833/656 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Please see attached Document. |
| **Attached documents** | Welbeck Strategic Land LLP - Dominic Lawson Bespoke Planning (Harriet Swale).pdf (1.4 MB) |

| | |
|---|---|
| **Respondent Name** | Richard Hunter |
| **Comment ID** | 12513441/660 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **(a) Engagement with Local Councils:**<br><br>Before the next stage of producing the new Local Plan South Gloucestershire should tap into local knowledge in Iron Acton about the significance locally of particular sites and areas, their sustainability, land ownership, historic or ecological value etc. This should be a genuine reaching-out to local people rather than simply general "drop-in" events. This would be consistent with the spirit of the South Gloucestershire Statement of Community Involvement and alert the Authority to issues of particular local sensitivity or concern. The Plan should be honest and refer to Iron Acton and not just NW Yate.<br><br>**(b) M4 Junction 18A:**<br><br>The decision in March 2018 by South Gloucestershire Cabinet Members to recommend the Lyde Green option for the new Junction 18A on the M4 following the public Consultation in 2017 means that Highways England is now in a position to make a firm recommendation to the Department for Transport on its location. The new Junction should include a link to Yate. It would change significantly the relative sustainability |

| | |
|---|---|
| | of different locations in the Yate/Chipping Sodbury area. This should be taken into account in the new Local Plan and in the Joint Spatial Plan. Failure to do so will undermine both Plans and render them unsound.<br><br>**(c) General Approach Proposed for the Local Plan:**<br><br>I agree that the starting point should be the completion of existing, agreed Core Strategy developments in South Gloucestershire, and that priority should be given to urban renewal and maximising the use of Brownfield land in Yate/Chipping Sodbury in order to minimise loss of Greenfield land. This would include proceeding with the North Yate New Neighbourhood which would provide up to 3,000 new homes for Yate.<br><br>Although it is 12 years since the North Yate New Neighbourhood was agreed nothing has been built. This means that there is no justification for the further proposal for 2,000 homes in the neighbouring North West Yate location. North West Yate should not proceed in the absence of clear evidence that there is a demand for another 4,000 homes in the Yate, Chipping Sodbury and Coalpit Heath area. Over-supply of development sites will simply encourage developers to cherry-pick the easiest ones resulting in a piecemeal approach rather than the "master-planning" South Gloucestershire says it wants.<br><br>I also object strongly to siting the proposed North West Yate development in the Iron Acton Green Belt without demonstrating the "exceptional circumstances" required by National Guidance. No justification is given in the Draft Joint Spatial Plan and it appears that no justification will be given in the new Local Plan. So how will the national requirements be demonstrated? South Gloucestershire should rethink. If it has to identify sites for major new development additional to North Yate they should be in areas close to the new M4 Junction 18A, rather than in Iron Acton (which is separated from it by a railway line, the River Frome and unspoilt Green Belt).<br><br>**(d) Design of New Development:**<br><br>I welcome South Gloucestershire's commitment to a "master-planning" approach to strategic developments "in Consultation with local and community interests" and to setting out clearly exactly where it proposes new development should occur. But in villages and other non-urban settlements the design of smaller, non-strategic developments is just as important. This includes paying close attention to the shape, scale and appearance of development to ensure it sits harmoniously within its context. Historic England has pointed out that from Roman times buildings in the West of England have used local stone and other materials giving a characteristic look and feel to our historic settlements. In Iron Acton local pennant stone was the most commonly used material along with oak structural timbers. Even the name, Iron Acton, means village of oak. This "local vernacular" should be reflected in the design of any new developments, large or small, in Iron Acton Parish.<br><br>I do not agree that the proposed North West Yate development, if it goes ahead, should have a "modernist" feel to match the post 1960's housing in Yate. Even though it is referred to as North West Yate it would be effectively a separate neighbourhood in Iron Acton separated from Yate by the industrial areas East of the Yate Road/Armstrong Way roundabout. If it is to go ahead despite the overwhelming opposition of local people it should at least be designed with reference to local historic building traditions so that the existing beautiful pennant stone buildings and walls in the area are not overwhelmed and turned into historical anomalies by a "modernist" aesthetic.<br><br>I share South Gloucestershire's view that no development should be begun without pre-delivery of essential infrastructure. In Iron Acton Parish that would include increasing transport capacity to avoid worsening the existing congestion and lorry blight on the B4058 Wotton/Bristol Road, and B4059 Yate/Latteridge Road. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Richard Hunter |
| **Comment ID** | 12513441/661 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | SDL - Yate:<br><br>**Urban Localities – Yate:**<br><br>I welcome the proposed "whole town" approach to future planning for Yate but do not support the inclusion of the proposed North West Yate Strategic Development Location in this. In the absence of credible evidence that the Yate/Chipping Sodbury/Coalpit Heath area needs the proposed 50% increase in housing stock (over 20 years, meaning an unprecedented 2.5% average annual population increase), and in the absence of credible evidence that building in the Green Belt is justified and the most sustainable option, the North West Yate proposal should not proceed.<br><br>I support the suggested "Western Gateway" around Yate Railway Station and the aim of more intensive and mixed use of the employment areas within the Parish (in particular the Industrial Estates East of the Yate/Armstrong Road Roundabout). As part of this steps should be taken to reduce the impact of heavy goods traffic on homes on the B4058 Wotton/Bristol Road and the B4059 Yate/Latteridge Road, principally by supporting proposals for the new M4 Junction 18A and encouraging heavy goods vehicles to use that route. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Zoe Hancock - Bristol Avon Catchment Partnership |
| **Comment ID** | 19832225/671 |
| **Document Part Name** | Question 19 Other Comments |

| | |
|---|---|
| **Comment** | **South Gloucestershire Local Plan 2018 – 2036:**<br><br>General Comments:<br><br>Comments on behalf of the Bristol Avon Catchment Partnership (BACP):<br><br>The BACP welcomes the opportunity to Comment on this Local Plan Review. The BACP comprises a range of organisations, groups and individuals dedicated to working together to improve the river and land environment in the Bristol Avon Catchment. Some of the partners include: Environment Agency; Water companies; Natural England; the Wildlife Trusts; the River Trust; the Councils and the Local Nature Partnerships.<br><br>The BACP was one of the original Defra pilots to trial the Catchment-Based Approach in England during 2012. A Stakeholder process was developed to identify the key water-based issues and solutions at a river catchment scale. Wessex Water currently hosts the Catchment Partnership, for more information and to read our **Catchment Plan** please see the website.<br><br>The BACP has identified the key water-based issues in the Bristol Avon Catchment and is keen to engage with South Gloucestershire Council to use this Evidence Base (Environmental Services Evidence Review) to help inform future decision making and ensure sustainable development and infrastructure is supported via the Local Plan where relevant.<br><br>The BACP is keen for South Gloucestershire Council to incorporate and embed the importance of functioning, healthy river catchments within the Policy context of the Local Plan Review. There are many rivers within the South Gloucestershire area of importance to the local communities, wildlife and economy. For example, the Bristol Frome and its tributaries (e.g. Ladden Brook and Bradley Brook) and the Lower Severn Vale river catchment that includes the Little Avon River, all provide a connection to nature and recreation/amenity benefits to residents/visitors. Various river related work has been delivered via the BACP Partners to improve the habitat, wildlife and the water quality of these rivers and the BACP is keen to work with the Council to carry on protecting and restoring these rivers in the future.<br><br>The BACP Action Plan will be finalised in 2018 and identifies 30 partnership projects, including 10 priority projects. One of the priority projects is the **Bristol Frome Improvement Project.** This Project has been identified and prioritised via the Partnership and offers great opportunities for South Gloucestershire Council to work with other key Stakeholders to deliver an improved water environment and deliver multi-beneficial outcomes for the environment, local people and economy and to also work collaboratively to address the challenges and opportunities identified via the Local Plan. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Rosemary White |
| **Comment ID** | 10707009/694 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | (a) Engagement with Local Councils:<br><br>Before the next stage of producing the new Local Plan, South Gloucestershire should tap into local knowledge in Iron Acton about the significance locally of particular sites and areas, their sustainability, land ownership, historic or ecological value etc. This should be a genuine reaching-out to local people rather than simply general "drop-in" events. This would be consistent with the spirit of the South Gloucestershire Statement of Community Involvement and alert the Authority to issues of particular local sensitivity or concern.<br><br>(b) M4 Junction 18A:<br><br>The decision in March 2018 by South Gloucestershire Cabinet Members to recommend the Lyde Green option for the new Junction 18A on the M4 following the public Consultation in 2017 means that Highways England is now in a position to make a firm recommendation to the Department for Transport on its location. The new Junction should include a link to Yate. It would change significantly the relative sustainability of different locations in the Yate/Chipping Sodbury area. This should be taken into account in the new Local Plan and in the Joint Spatial Plan. Failure to do so will undermine both Plans and render them unsound.<br><br>(c) General Approach Proposed for the Local Plan:<br><br>I agree that the starting point should be the completion of existing, agreed Core Strategy developments in South Gloucestershire, and that priority should be given to urban renewal and maximising the use of Brownfield land in Yate/Chipping Sodbury in order to minimise the loss of Greenfield land. This would include proceeding with the North Yate New Neighbourhood which would provide up to 3,000 new homes for Yate.<br><br>Although it is 12 years since the North Yate New Neighbourhood was agreed nothing has been built. This means that there is no justification for the further proposal for 2,000 homes in the neighbouring North West Yate location. North West Yate should not proceed in the absence of clear evidence that there is a demand for another 4,000 homes in the Yate, Chipping Sodbury and Coalpit Heath area. Over-supply of development sites will simply encourage developers to cherry-pick the easiest ones resulting in a piecemeal approach rather than the "master-planning" South Gloucestershire says it wants. |

| | |
|---|---|
| | I also object strongly to siting the proposed North West Yate development in the Iron Acton Green Belt without demonstrating the "exceptional circumstances" required by National Guidance. No justification is given in the Draft Joint Spatial Plan and it appears that no justification will be given in the new Local Plan. So how will the national requirements be demonstrated? South Gloucestershire should rethink. If it has to identify sites for major new development additional to North Yate they should be in areas close to the new M4 Junction 18A, rather than in Iron Acton (which is separated from it by a railway line, the River Frome, and unspoilt Green Belt).<br><br>(d) Design of New Development:<br><br>I welcome South Gloucestershire's commitment to a "master-planning" approach to strategic developments "in Consultation with local and community interests" and to setting out clearly exactly where it proposes new development should occur. But in villages and other non-urban settlements the design of smaller, non-strategic developments is just as important. This includes paying close attention to the shape, scale, and appearance of development to ensure it sits harmoniously within its context. Historic England has pointed out that from Roman times buildings in the West of England have used local stone and other materials giving a characteristic look and feel to our historic settlements. In Iron Acton, local pennant stone was the most commonly used material along with oak structural timbers. Even the name, Iron Acton, means village of oak. This "local vernacular" should be reflected in the design of any new developments, large or small, in Iron Acton Parish.<br><br>I do not agree that the proposed North West Yate development, if it goes ahead, should have a "modernist" feel to match the post 1960's housing in Yate. Even though it is referred to as North West Yate it would be effectively a separate neighbourhood in Iron Acton separated from Yate by the industrial areas East of the Yate Road/Armstrong Way roundabout. If it is to go ahead despite the overwhelming opposition of local people it should at least be designed with reference to local historic building traditions so that the existing beautiful pennant stone buildings and walls in the area are not overwhelmed and turned into historical anomalies by a "modernist" aesthetic.<br><br>I share South Gloucestershire's view that no development should be begun without pre-delivery of essential infrastructure. In Iron Acton Parish that would include increasing transport capacity to avoid worsening the existing congestion and lorry blight on the B4058 Wotton/Bristol Road, and B4059 Yate/Latteridge Road. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Rosemary White |
| **Comment ID** | 10707009/695 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | SDL - Yate:<br><br>Urban Localities - Yate:<br><br>I welcome the proposed "whole town" approach to future planning for Yate but do not support the inclusion of the proposed North West Yate Strategic Development Location in this. In the absence of credible evidence that the Yate/Chipping Sodbury/Coalpit Heath area needs the proposed 50% increase in housing stock (over 20 years, meaning an unprecedented 2.5% average annual population increase), and in the absence of credible evidence that building in the Green Belt is justified and the most sustainable option, the North West Yate proposal should not proceed.<br><br>I support the suggested "Western Gateway" around Yate Railway Station and the aim of more intensive and mixed use of the employment areas within the Parish (in particular the Industrial Estates East of the Yate/Armstrong Road Roundabout). As part of this steps should be taken to reduce the impact of heavy goods traffic on homes on the B4058 Wotton/Bristol Road and the B4059 Yate/Latteridge Road, principally by supporting proposals for the new M4 Junction 18A and encouraging Heavy Goods Vehicles to use that route. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Purchase |
| **Comment ID** | 2804385/705 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **(a) Engagement with Local Councils:**<br><br>Before the next stage of producing the new Local Plan South Gloucestershire should tap into local knowledge in Iron Acton about the significance locally of particular sites and areas, their sustainability, land ownership, historic or ecological value etc. This should be a genuine reaching-out to local people rather than simply general “drop-in” events. This would be consistent with the spirit of the South Gloucestershire Statement of Community Involvement and alert the Authority to issues of particular local sensitivity or concern.<br><br>**(b) M4 Junction 18A:**<br><br>The decision in March 2018 by South Gloucestershire Cabinet Members to recommend the Lyde Green option for the new Junction 18A on the M4 following the public Consultation in 2017 means that Highways England is now in a position to make a firm recommendation to the |

| | |
|---|---|
| | Department for Transport on its location. The new Junction should include a link to Yate. It would change significantly the relative sustainability of different locations in the Yate/Chipping Sodbury area. This should be taken into account in the new Local Plan and in the Joint Spatial Plan. Failure to do so will undermine both Plans and render them unsound.<br><br>**(c) General Approach Proposed for the Local Plan:**<br><br>I agree that the starting point should be the completion of existing, agreed Core Strategy developments in South Gloucestershire, and that priority should be given to urban renewal and maximising the use of Brownfield land in Yate/Chipping Sodbury in order to minimise loss of Greenfield land. This would include proceeding with the North Yate New Neighbourhood which would provide up to 3,000 new homes for Yate.<br><br>Although it is 12 years since the North Yate New Neighbourhood was agreed nothing has been built. This means that there is no justification for the further proposal for 2,000 homes in the neighbouring North West Yate location. North West Yate should not proceed in the absence of clear evidence that there is a demand for another 4,000 homes in the Yate, Chipping Sodbury and Coalpit Heath area. Over-supply of development sites will simply encourage developers to cherry-pick the easiest ones resulting in a piecemeal approach rather than the "master-planning" South Gloucestershire says it wants.<br><br>I also object strongly to siting the proposed North West Yate development in the Iron Acton Green Belt without demonstrating the "exceptional circumstances" required by National Guidance. No justification is given in the Draft Joint Spatial Plan and it appears that no justification will be given in the new Local Plan. So how will the national requirements be demonstrated? South Gloucestershire should rethink. If it has to identify sites for major new development additional to North Yate they should be in areas close to the new M4 Junction 18A where most of the landowners in that area have completed a Call for Sites justifying why development should take place there and also demonstrating their support for it, rather than in Iron Acton where many landowners have not completed a Call for Sites as they do not support development in this naturally beautiful area (which is separated from it by a railway line, the River Frome and unspoilt Green Belt).<br><br>**(d) Design of New Development:**<br><br>I welcome South Gloucestershire's commitment to a "master-planning" approach to strategic developments "in Consultation with local and community interests" and to setting out clearly exactly where it proposes new development should occur. But in villages and other non-urban settlements the design of smaller, non-strategic developments is just as important. This includes paying close attention to the shape, scale and appearance of development to ensure it sits harmoniously within its context. Historic England has pointed out that from Roman times buildings in the West of England have used local stone and other materials giving a characteristic look and feel to our historic settlements. In Iron Acton local pennant stone was the most commonly used material along with oak structural timbers. Even the name, Iron Acton, means village of oak. This "local vernacular" should be reflected in the design of any new developments, large or small, in Iron Acton Parish.<br><br>I do not agree that the proposed North West Yate development, if it goes ahead, should have a "modernist" feel to match the post 1960's housing in Yate. Even though it is referred to as North West Yate it would be effectively a separate neighbourhood in Iron Acton separated from Yate by the industrial areas East of the Yate Road/Armstrong Way roundabout. If it is to go ahead despite the overwhelming opposition of local people it should at least be designed with reference to local historic building traditions so that the existing beautiful pennant stone buildings and walls in the area are not overwhelmed and turned into historical anomalies by a "modernist" aesthetic.<br><br>I share South Gloucestershire's view that no development should be begun without pre-delivery of essential infrastructure. In Iron Acton Parish that would include increasing transport capacity to avoid worsening the existing congestion and lorry blight on the B4058 Wotton/Bristol Road, and B4059 Yate/Latteridge Road. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Susan Purchase |
| **Comment ID** | 2804385/706 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | SDL - Yate:<br><br>**Urban Localities – Yate:**<br><br>I welcome the proposed "whole town" approach to future planning for Yate but do not support the inclusion of the proposed North West Yate Strategic Development Location in this. In the absence of credible evidence that the Yate/Chipping Sodbury/Coalpit Heath area needs the proposed 50% increase in housing stock (over 20 years, meaning an unprecedented 2.5% average annual population increase), and in the absence of credible evidence that building in the Green Belt is justified and the most sustainable option, the North West Yate proposal should not proceed.<br><br>I support the suggested "Western Gateway" around Yate Railway Station and the aim of more intensive and mixed use of the employment areas within the Parish (in particular the Industrial Estates East of the Yate/Armstrong Road Roundabout). As part of this steps should be taken to reduce the impact of heavy goods traffic on homes on the B4058 Wotton/Bristol Road and the B4059 Yate/Latteridge Road, principally by supporting proposals for the new M4 Junction 18A and encouraging Heavy Goods Vehicles to use that route. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Melanie Lindsley - The Coal Authority |

| | |
|---|---|
| **Comment ID** | 17730817/716 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **South Gloucestershire Council - Call for Sites Consultation:**<br><br>-<br><br>Thank you for your Notification received on 9th February 2018 in respect of the above Consultation.<br><br>I can confirm that the Coal Authority has no sites to put forward for inclusion in your current Call for Sites. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mark Williams |
| **Comment ID** | 19729473/718 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Representations to the South Gloucestershire Local Plan April 2018:<br><br>In regard of Land London Road, Wick:<br><br>We represent the owners of circa 1.1ha of Land North of London Road on the Eastern side of Wick. The extent of land is shown in the attached Plan and illustrates that it is adjacent to the built up area, with housing to the West, London Road to the South and the BP Petrol Filling Station and shop to the East.<br><br>The land was previously promoted to the South Gloucestershire Council (SGC) Policies, Sites and Places (PSP) Plan Consultation in January 2016 and subsequently further detailed material was issued to the Council in February of the same year. This information included Highways and Landscape Assessments which supplemented the initial land promotion and are included with this Submission.<br><br>Since the Submission of that material, Wick and Abson Parish Council have undertaken an Affordable Housing Needs Survey which was reported in October 2017. This concluded that there is an identified local need for between 8 and 11 Affordable Homes in the Parish.<br><br>It is anticipated that the Land off London Road might deliver up to 30 dwellings which might provide at least the level of Affordable Housing indicated by the Survey as necessary in the Parish.<br><br>Given the scale of potential development, the site would be considered as part of the Non Strategic Growth as defined in the SGLP Consultation Document and as such this Submission focuses on the questions posed, as set out on Page 71. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tony and Jacqueline Polonowski |
| **Comment ID** | 19442529/725 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | As residents of  for over  years it comes as a shock to be informed that the fields running alongside Nibley Lane, Hope Road and Bridge Road are now under threat of development. These fields are situated in the hitherto protected **Green Belt within the Parish of Iron Acton**.<br><br>To replace the fields within this Green Belt with the proposed dense housing would be in direct contradiction to **SGC's Supplementary Planning Document (SPD) June 2007 – Development in the Green Belt and in particular Planning Policy Guidance Note 2: Green Belts,** which identifies the following five purposes of the Green Belt:<br><br>1. *To check the unrestricted sprawl of large built-up areas;*<br>2. *To prevent neighbouring towns from merging into one another;*<br>3. *To assist in safeguarding the countryside from encroachment;*<br>4. *To preserve the setting and special character of historic towns;*<br>5. *To assist in urban regeneration, by encouraging the recycling of derelict and other urban land*<br><br>In addition, the **National Planning Policy (NPPF) 2012** states that it '*attaches great importance to Green Belts* and it declares *that the fundamental aim of the Green Belt Policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belt are their openness and their permanence.'*<br><br>**National Policy** also states that Local Planning Authorities should ensure that *'substantial weight is given to any harm to the Green Belt* and furthermore '*development which harms the openness of the Green Belt is regarded as being inappropriate and should not be approved except in 'very special circumstances.'*<br><br>With regard to 'very special circumstances;' the **adopted SPD: Green Belt (2007)** states that *'circumstances that are accepted as being 'very special' are very rare, but will usually involve a specific judgment being made that no other option is available in light of the unique circumstances and individual case. These circumstances are not common and are unique 'one-offs.'* |

**Unsound Decision:**

We feel that the decision, that the Green Belt area of Nibley, Iron Acton (and the Parish of Iron Acton) should be destroyed for the proposed dense housing development, is unsound, based on the following facts:

***Transport and Infrastructure:***

The road and rail links within the area at the moment cannot cope with the present load of traffic moving in and out of Yate and the adjoining villages let alone the massive increase in traffic that would materialise from the building of 2,000 more homes in Nibley and the Parish of Iron Acton. Together with the Plans to develop approx 2,000 more houses in Coalpit Heath.

The A4174 so-called 'Ring Road' full of roundabouts controlled by traffic lights cannot cope with the amount of traffic using it at present. The substantial increase in vehicles that would result from the dense housing planned would lead to permanent hold-ups especially during peak hours.

In addition, at present the **Joint Spatial Plan and Transport Study** is a Feasibility Study looking at the options for a new Junction 18a to **link** the M4 with the A4174 Ring Road. If this new Junction materialises, it will result in a continual flow of extra Motorway traffic pouring onto the Badminton Road.

If the new Junction 18a from the M4 was linked to the M5 using 'the road to nowhere,' as previously Approved by South Gloucestershire Council, this would have potentially provided Yate and the surrounding areas with an opportunity to grow the town. Not linking the two Motorways will put more pressure on all the minor A and B Roads surrounding Yate.

It is vitally important that much improved road and rail links, capable of coping with the enormous increase in traffic, are put in place first before any decision is taken to build more houses in this area.

If we have to do anything let us make sure we do it right! South Gloucestershire Council must ensure that the businesses in our area benefit from any proposed changes. What is the point of building more houses if our area suffers from lack of investment? We need to make our area an attractive option for businesses to prosper.

Businesses must come first and the infrastructure must be in place to support them. With the current rail upgrading and electrification we have a great opportunity to develop and use the railway through Yate to support local businesses. We have to move the larger businesses away from the Trading Estates/Business Parks in Yate closer to the Motorways to reduce business costs, improve performance and increase efficiency.

With the increase in job opportunities resulting from improved businesses and road and rail infrastructure the people needed to support this will come, but if we miss the opportunity we have been given to compete in the 21st Century we are wasting time and money.

**It is vital that the improved road and rail links, Schools, Medical Facilities and job opportunities are all in place before any additional housing development goes ahead.**

***Destruction of the Green Belt:***

The proposed 2,000 housing development within the village of Nibley together with the surrounding Parish of Iron Acton would irretrievably damage forever the beautiful Green Belt area of Iron Acton and Nibley. A Green Belt area which is enjoyed on a daily basis by not only the inhabitants of Nibley, Iron Acton, North Road and Engine Common, but also the whole of Yate. At present this beautiful open countryside comprising fields and woodland walks is within easy walking distance for the residents of Yate and Chipping Sodbury to enjoy the pleasures of the wildlife in the area. The lanes and fields between Nibley and Iron Acton which encompass the Frome Valley Walkway are also used on a daily basis by walkers from other areas of South Gloucestershire, Bristol and even further away. In addition Bridge Road, Hope Road and Nibley Lane also form part of the National Cycleway and are used regularly by large groups of cyclists speeding through the area.

***Geological Issues:***

The fields running alongside the River Frome are in the Flood Plain and during the time we have lived in we have seen many of them flooded to such an extent that canoeists have used them as 'lakes.'

The fields surrounding Nibley Lane also contain coal just below the surface. During the time we have lived in the previous farmer who owned these fields used to hit coal seams when ploughing and plough the coal back into the ground.

The fact that coal mines operated between Mays Hill and Nibley raises the question of Land Stability in the fields between Nibley and Iron Acton and the surrounding areas (Ref: **Gov UK Guidance on Land Stability Paragraph: 003 Reference ID: 45-003-20140306).**

***Personal Perspective:***

| | |
|---|---|
| | We have lived in for over years and have been lucky enough to in a beautiful rural environment. However we are not alone, the fields surrounding Nibley and the Parish of Iron Acton provide everyone with the opportunity to enjoy the pleasures of living in country villages. In addition the Frome Valley Walkway provides the opportunity for walkers of all ages to enjoy the benefits of being able to relax in the solitude of the country. To replace the fields within the hitherto protected Green Belt for development of the proposed 2,000 houses would be a travesty for the following reasons:<br><br>**The fields and farmland surrounding Nibley Lane, Hope Road and Bridge Road** are home to a wide range of wildlife such as:<br><br>• Deer<br>• Badgers (Consisting of a large and very well established Badger sett which has been in existence for at least years)<br>• Rabbits<br>• Foxes<br>• Slow worms<br>• Newts<br>• Otters<br>• As well as a wide variety of birdlife including Heron, Buzzards, Skylarks and Kingfishers.<br><br>These animals and their natural habitats are protected by the **Countryside and Wildlife Act 1981** the aim of which is the **Conservation of European Wildlife and Natural Habitats.**<br><br>There are also a number of established Equestrian Centres and farms. In particular, the owner of Frome Mill Farm in Nibley has sublet his fields to from outside the village and provided them with the opportunity of setting up 'Community 'Farms'/smallholdings which are home to animals such as sheep, goats, pigs, ducks and chickens. This initiative must be complimented and allowed to flourish.<br><br>The village of Nibley and the fields between Nibley and Iron Acton also contain many historical features which can be viewed by users of the designated Frome Valley Walkway such as: The Old Nibley Mill which has now been converted into houses and apartments, The unique Mill Race which travels underground through a historic tunnel into the River Frome, a ford, 2 freshwater springs, Chill Wood, The Old Railway which runs between Tytherington and Iron Acton, and the walks leading from Nibley to Tubbs Bottom Dam to Algars Manor.<br><br>who from the area spend many happy hours revisiting the fields and woods of their youth and enjoy bringing to relive their happy memories of playing in the countryside. It is vitally important for the benefit of future generations to preserve the uniqueness of this area to be enjoyed in years to come.<br><br>As mentioned above, the destruction of the expanse of fields and woods for the development of dense housing would irretrievably damage the Green Belt in this area for ever and destroy the simple pleasure of being able to walk freely through the country lanes, fields and woods. The prospect that future generations will be denied this chance to relax and enjoy nature is extremely sad.<br><br>**If the destruction of the Green Belt is allowed to continue unchecked the time will come when our descendants will never experience the fun of running in fields and their only knowledge of rural life will be gained from books and films of 'the way it used to be.'**<br><br>**Summary:**<br><br>Before South Gloucestershire Council make what would be a devastating decision to irretrievably destroy the Field, Farmland and Woods that make up the beautiful Green Belt surrounding Nibley, Iron Acton and the Parish of Iron Acton we feel that serious consideration and emphasis should be given to the fact that the order of development within the area should be:<br><br>1. Upgrading, Regeneration and Relocation of Businesses.<br>2. Improved Road and Rail infrastructure, including the M4 and M5 links<br>3. Upgraded Medical Facilities/new Hospital able to cope with the influx of thousands more people within the immediate area and within South Gloucestershire as a whole.<br>4. Schools<br>5. Then, and only then, should consideration be given as to whether the area has enough job opportunities and the right infrastructure to support the increase in traffic and provide quality of life for any new residents.<br>6. **Every effort should be made to regenerate 'Brownfield sites' and derelict and urban areas before thinking of irretrievably destroying the Green Belt areas forever.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Amy Shepherd - Somerset County Council |
| **Comment ID** | 11460449/726 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **Consultation Response:**<br><br>**New Local Plan Consultation Document:** |

| | |
|---|---|
| | **Introduction:**<br><br>Somerset County Council welcomes the opportunity to respond to this Consultation.<br><br>Please find Comments from the County Council Acoustics Specialist.<br><br>Should you have any queries regarding the comments, please contact Amy Shepherd, Corporate Performance Officer on or<br><br>**Consultation Response:**<br><br>The South Gloucestershire Local Plan (SGLP) covers the period 2018 - 2036 and states(1.6) it contains '*detailed Strategy and Policies for delivering the development identified in it.*' It will be used to determine Planning Applications and has intention to create housing in Brownfield areas(2.9) and as such noise impact consideration, and the outcomes arising from the introduction of new noise sensitivities to areas of commercial significance, both become important considerations.<br><br>Searching the SGLP for references to noise only reveals one instance for its explicit consideration, as associated with the Oldbury Power Station Decommissioning(P89). The County Council Acoustics Specialist notes that '*need for Noise Policy addressing mitigation and design associated with cultural facilities*' as identified in 4.46 of the Local Plan Prospectus Consultation 2017 - Report of Engagement and Main Issues February 2018 (land use issues relevant to South Gloucestershire) is not addressed in the SGLP. This would be particularly necessary if new housing development is to co-exist in some mixed use urban settings and consideration of this very point prompted revision proposals to the NPPF. These revisions introduce the 'agent of change' principle and place greater responsibility for effective noise mitigation on new housing development.<br><br>The County Council Acoustics Specialist notes that references are made to Core Strategy Policy throughout the SGLP and these may need to be updated if the recently adopted (Dec 2017) Joint Core Strategy replaces this. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Chelverton Developments Ltd |
| **Comment ID** | 16478625/729 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Introduction:<br><br>Bristol developer, Chelverton Developments Ltd working jointly with Hanson, is pleased to provide Comments on the South Gloucestershire Local Plan Review Consultation (February 2018).<br><br>Chelverton secured permission for recently-completed mixed use development at Barnhill, Chipping Sodbury comprising a range of market/ Affordable Housing, a retirement living complex, and a new Waitrose foodstore at the edge of the Town Centre. Chelverton facilitated additional housing development at the former Hanson Quarry Batching Plant and social club sites (currently under construction) and is currently promoting the re-use of additional surplus Quarry land at Barnhill for housing as quarrying activities migrate North within the Sodbury Quarry Complex. A 'Call for Sites' Submission was made in February 2017 regarding the current surplus Quarry land and adjoining land in Hanson's ownership (Site Ref: SG65: Land at Barnhill, Sodbury).<br><br>Chelverton sets out its Comments below in relation to Questions 1 - 3 of the Consultation Document. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | James Carpenter - Falfield Parish Council |
| **Comment ID** | 16617825/745 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **Other 1:**<br><br>**Introduction:**<br><br>Falfield Parish Council does not agree that the Joint Spatial Plan (JSP) and the Local Plan are ensuring "the right growth in the right locations." The JSP is still yet to be reviewed, inspected and the public engagement Comments read. The Inspector's Feedback has yet to be received let alone incorporated. In light of this Falfield Parish Council feels that this Local Plan Consultation, particularly where it refers to specific "Strategic Development Location" (SDL) sites, is premature.<br><br>On Page 4 of the Consultation Document, it states that a focus of the Plan is to protect our open countryside and valuable natural assets. The proposals for the "Strategic Development Location" (SDL) sites and some of the rural "Non Strategic Development Location" (NSDL) sites then set out to do the exact opposite of this. |

| | |
|---|---|
| | It is concerning to our Council that there are a number of References, e.g. Page 12 & 16, where the Consultation Document states that "substantial levels of new development over the past half Century have not been matched by provision of essential physical and social infrastructure" and "Investment in transport infrastructure has been insufficient to provide for the growing economy" and "pressure on existing infrastructure could be exacerbated by proposed new developments." Going forward this does not inspire confidence that the same mistakes on infrastructure provision will not be made by the same Council again, and that developers will get away with trying to minimise and challenge any contributions they are asked to provide, we are aware that some of the named developers leading the key SDL sites already have a track record of doing this. There is very little information and emphasis in the Local Plan Consultation Document guaranteeing that infrastructure will be provided from the outset i.e. prior to any new housing, instead it includes the very vague description of 'a timely way,' and this is disappointing. There needs to be stronger statements which commit to the early provision of infrastructure otherwise the housing developments do not proceed, other Councils within the WECA Group have made such statements, so why cannot South Gloucestershire Council make similar promises to its residents?<br><br>Under the "Key Issues and Objectives" for the Plan Section on Page16, the Plan states that a priority for the new Local Plan is a "*need to address congestion and accessibility issues through a step change in the quality of our transport infrastructure, with the aim to provide for a programme of significant improvements to walking and cycling, Public Transport road and rail services aligned to new development.*" This is a sensible aspiration but there is too little emphasis under the Plan's priorities for travel on also improving provision for private motor vehicle users. People in rural areas are heavily reliant on their cars, especially when they need to travel longer distances, which cannot be walked or cycled, to destinations which may be cross country along country lanes or 'out of town.' They often have complex patterns of commuting. The offer of one bus route e.g. a single direction MetroBus route for Buckover, will not mitigate the impact placing large swathes of housing in the far Northern extremities of the County will have on the local rural road networks. |
| **Attached documents** | Falfield Parish Council (Mr. James Carpenter).pdf (1.9 MB) |

| | |
|---|---|
| **Respondent Name** | James Carpenter - Falfield Parish Council |
| **Comment ID** | 16617825/746 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | ***Other 2:***<br><br>***Strategic Development Locations (SDL) (Pages 50 – 53):***<br><br>*The* JSP is still yet to be reviewed, inspected and public engagement Comments read. The Inspector's Feedback has yet to be received let alone incorporated. In light of this Falfield Parish Council feels that this Local Plan Consultation, where it refers to specific *"Strategic Development Location"* (SDL) sites, is premature.<br><br>It is also premature because key decisions to incorporate SDL sites into the JSP and Local Plan are being made before Policies have been written, studies undertaken and design schemes prepared to test the practicality, viability and cost of large quantities of housing at these SDL sites. This lack of detail would not be acceptable for far smaller schemes seeking Planning Permission and it is astonishing that housing schemes of this magnitude can be actively promoted by the Council and written into the Local Plan based upon such little information and study.<br><br>On Page 4 of the Consultation Document, it states that a focus of the Plan is to protect our open countryside and valuable natural assets. The proposals for the *"Strategic Development Location"* (SDL) sites do the exact opposite of this.<br><br>Falfield Parish Council called for a review of the Green Belt prior to the JSP site allocations, as it would free up more appropriate land for housing closer to the areas of demand, only to be told it could not be done. We are perplexed that the Council now has a suggestion, see Item 2.40 No. 4 to *"make appropriate amendments to the Green Belt boundary"* after choosing their preferred sites.<br><br>Paragraph 2.39 says "*The council proposes that JSP Policies 7.8 - 7.12 should be further developed through the new Local Plan.*" Falfield Parish Council attaches our previous Comments on these Policies (Please refer to Page 11 of this Response onwards). |
| **Attached documents** | Falfield Parish Council (Mr. James Carpenter).pdf (1.9 MB) |

| | |
|---|---|
| **Respondent Name** | James Carpenter - Falfield Parish Council |
| **Comment ID** | 16617825/747 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **Other 3:**<br><br>**New Policy - Utilities:**<br><br>Falfield Parish Council would like to see a Policy mentioning Utility Services provision for existing residential areas near to new development sites in rural areas.<br><br>We feel that opportunities to improve Utility Services provision e.g. gas, mains sewers, electricity etc for existing residents living near to new development sites should also be included in a Policy, and that consideration is made by developers to improving Utility Services access for providers to existing nearby properties and the provision of ducts across land to serve nearby properties etc.<br><br>A new Local Plan Policy may be required to incorporate this. |
| **Attached documents** | Falfield Parish Council (Mr. James Carpenter).pdf (1.9 MB) |

| | |
|---|---|
| **Respondent Name** | Suzanna Keenan |
| **Comment ID** | 17805057/748 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **(a) Engagement with Local Councils:**<br><br>I have found it difficult to provide feedback on the Local Plan because there is so little detail to be able to make this Consultation valid. I have personally attended a number of different SGC Consultations, none of which were able to provide the level of detail I feel is necessary to allow local people to Comment on the proposals. Even when questioning SGC Officials at these events, they themselves have confirmed there are no clear Plans of where the proposed housing, employment, transport links and/or infrastructure will sit. It seems the Plans are very vague and only outline where possible development may end up. I therefore I feel the information provided is inadequate.<br><br>I also feel that SGC have attempted to conceal the JSP proposals for the Strategic Sites by labelling the Parish of Iron Acton, including Engine Common & Nibley as 'North West Yate.' Describing this area as North West Yate is not recognised by residents as it is not an accurate description for the area SGC have circled in the JSP therefore making this Consultation flawed.<br><br>Before the next Stage of producing the new Local Plan South Gloucestershire should tap into local knowledge in Iron Acton & Engine Common about the significance locally of sites and areas, their sustainability, land ownership, historic or ecological value etc. This should be a genuine reaching-out to local people rather than simply general "drop-in" events. This would be consistent with the spirit of the South Gloucestershire Statement of Community Involvement and alert the Authority to issues of particular local sensitivity or concern.<br><br>I would also like to point to previous Planning Applications which were rejected by SGC over the past 8 years in respect of unsuccessful Development Applications for the land between Dyers Lane, Mission Road and the North Road, Engine Common. Local residents have responded numerous times over the years in an attempt to protect our green spaces, local habitat, the character and feel of the area and highlight serious drainage issues due to the perched Water Table. I would strongly encourage SGC to re-visit these Comments and include these as valid Representations as part of the Local Plan Consultation as despite the Plans being vague, it is clear that either by virtue of the JSP Strategic Sites or the non-strategic sites that SGC is determined to build in this area one way or another.<br><br>**(b) M4 Junction 18A:**<br><br>The decision in March 2018 by South Gloucestershire Cabinet Members to recommend the Lyde Green option for the new Junction 18A on the M4 following the public Consultation in 2017 means that Highways England is now in a position to make a firm recommendation to the Department for Transport on its location. The new Junction should include a link to Yate. It would change significantly the relative sustainability of different locations in the Yate/Chipping Sodbury area. This should be taken into account in the new Local Plan and in the Joint Spatial Plan. Failure to do so will undermine both Plans and render them unsound.<br><br>**(c) General Approach Proposed for the Local Plan:**<br><br>I agree that the starting point should be the completion of existing, agreed Core Strategy developments in South Gloucestershire, and that priority should be given to urban renewal and maximising the use of Brownfield land in Yate/Chipping Sodbury in order to minimise loss of Greenfield land. This would include proceeding with the North Yate New Neighbourhood which would provide up to 3,000 new homes for Yate.<br><br>Although it is 12 years since the North Yate New Neighbourhood was agreed nothing has been built. This means that there is no justification for the further proposal for 2,000 homes in the neighbouring North West Yate location. North West Yate should not proceed in the absence of clear evidence that there is a demand for another 4,000 homes in the Yate, Chipping Sodbury and Coalpit Heath area. Over-supply of development sites will simply encourage developers to cherry-pick the easiest ones resulting in a piecemeal approach rather than the "master-planning" South Gloucestershire says it wants.<br><br>I also object strongly to siting the proposed North West Yate development in the Iron Acton Green Belt without demonstrating the "exceptional circumstances" required by National Guidance. No justification is given in the Draft Joint Spatial Plan and it appears that no justification will be given in the new Local Plan. So how will the national requirements be demonstrated? South Gloucestershire should rethink. If it has to identify sites for major new development additional to North Yate they should be in areas close to the new M4 Junction 18A, rather than in Iron Acton & Engine Common (which is separated from it by a railway line, the River Frome and unspoilt Green Belt).<br><br>**(d) Design of New Development:**<br><br>I welcome South Gloucestershire's commitment to a "master-planning" approach to strategic developments "in Consultation with local and community interests" and to setting out clearly exactly where it proposes new development should occur. But in villages and other non-urban settlements the design of smaller, non-strategic developments is just as important. This includes paying close attention to the shape, scale and appearance of development to ensure it sits harmoniously within its context. Historic England has pointed out that from Roman times buildings in the West of England have used local stone and other materials giving a characteristic look and feel to our historic settlements. In Iron Acton local pennant stone was the most commonly used material along with oak structural timbers. Even the name, Iron Acton, means village of oak. This "local vernacular" should be reflected in the design of any new developments, large or small, in Iron Acton Parish.<br><br>I do not agree that the proposed North West Yate development, if it goes ahead, should have a "modernist" feel to match the post 1960's housing in Yate. Even though it is referred to as North West Yate it would be effectively a separate neighbourhood in Iron Acton/Engine Common separated from Yate by the industrial areas East of the Yate Road/Armstrong Way roundabout. If it is to go ahead despite the overwhelming opposition of |

| | |
|---|---|
| | local people it should at least be designed with reference to local historic building traditions so that the existing beautiful pennant stone buildings and walls in the area are not overwhelmed and turned into historical anomalies by a ”modernist” aesthetic.<br><br>I share South Gloucestershire’s view that no development should be begun without pre-delivery of essential infrastructure. In Iron Acton Parish that would include increasing transport capacity to avoid worsening the existing congestion and lorry blight on the B4058 Wotton/Bristol Road, and B4059 Yate/Latteridge Road. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Suzanna Keenan |
| **Comment ID** | 17805057/749 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | SDL - Yate:<br><br>**Urban Localities – Yate:**<br><br>I welcome the proposed “whole town” approach to future planning for Yate but do not support the inclusion of the proposed North West Yate Strategic Development Location in this. In the absence of credible evidence that the Yate/Chipping Sodbury/Coalpit Heath area needs the proposed 50% increase in housing stock (over 20 years, meaning an unprecedented 2.5% average annual population increase), and in the absence of credible evidence that building in the Green Belt is justified and the most sustainable option, the North West Yate proposal should not proceed.<br><br>I support the suggested “Western Gateway” around Yate Railway Station and the aim of more intensive and mixed use of the employment areas within the Parish (in particular the Industrial Estates East of the Yate/Armstrong Road Roundabout). As part of this steps should be taken to reduce the impact of heavy goods traffic on homes on the B4058 Wotton/Bristol Road and the B4059 Yate/Latteridge Road, principally by supporting proposals for the new M4 Junction 18A and encouraging Heavy Goods Vehicles to use that route. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Paul Hulbert - Joint Cycleway Group |
| **Comment ID** | 1052033/759 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Other - Section 2.40:<br><br>These Comments refer to infrastructure and to key Policy and Guidance required to inform Planning Applications and delivery.<br><br>I am writing as the Chairman of the Joint Cycleway Group, which represents cycling and mobility access interests in the Parishes of Yate, Dodington, Pucklechurch, Westerleigh and Sodbury. Our members are Representatives of the Parish/tTown Councils, local cycling groups and interested community members, an estimated  local residents. We meet regularly with South Glos to set priorities for cycling and mobility schemes in our area.<br><br>Our Comment is as follows:<br><br>It is important that the Policies for the Strategic Development Locations safeguard land for sustainable transport links and green infrastructure and makes their provision a requirement of the development - and that the conditions are double-checked when Planning Permission is granted, not forgotten about by South Glos Planning Dept. For example, we would like to see the route of the old Frog Lane Colliery Railway turned into a path for pedestrians, cyclists and horse riders, providing a link into the Yate Spur cycle path and via that to the Bristol Bath Railway Path. If following the Joint Spatial Plan Inquiry any of these sites are not taken ahead, we would still want the land safeguarded for this use in a Policy in the Local Plan. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Simon Whittard |
| **Comment ID** | 12489153/760 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **(a) Engagement with Local Councils:**<br><br>Before the next stage of producing the new Local Plan South Gloucestershire should tap into local knowledge in Iron Acton about the significance locally of particular sites and areas, their sustainability, land ownership, historic or ecological value etc. This should be a genuine reaching-out to local people rather than simply general “drop-in” events. This would be consistent with the spirit of the South Gloucestershire Statement of Community Involvement and alert the Authority to issues of particular local sensitivity or concern. |

| | |
|---|---|
| | **(b) M4 Junction 18A:**<br><br>The decision in March 2018 by South Gloucestershire Cabinet Members to recommend the Lyde Green option for the new Junction 18A on the M4 following the public Consultation in 2017 means that Highways England is now in a position to make a firm recommendation to the Department for Transport on its location. The new Junction should include a link to Yate. It would change significantly the relative sustainability of different locations in the Yate/Chipping Sodbury area. This should be taken into account in the new Local Plan and in the Joint Spatial Plan. Failure to do so will undermine both Plans and render them unsound.<br><br>**(c) General Approach Proposed for the Local Plan:**<br><br>I agree that the starting point should be the completion of existing, agreed Core Strategy developments in South Gloucestershire, and that priority should be given to urban renewal and maximising the use of Brownfield land in Yate/Chipping Sodbury in order to minimise loss of Greenfield land. This would include proceeding with the North Yate New Neighbourhood which would provide up to 3,000 new homes for Yate.<br><br>Although it is 12 years since the North Yate New Neighbourhood was agreed nothing has been built. This means that there is no justification for the further proposal for 2,000 homes in the neighbouring North West Yate location. North West Yate should not proceed in the absence of clear evidence that there is a demand for another 4,000 homes in the Yate, Chipping Sodbury and Coalpit Heath area. Over-supply of development sites will simply encourage developers to cherry-pick the easiest ones resulting in a piecemeal approach rather than the "master-planning" South Gloucestershire says it wants.<br><br>I also object strongly to siting the proposed North West Yate development in the Iron Acton Green Belt without demonstrating the "exceptional circumstances" required by National Guidance. No justification is given in the Draft Joint Spatial Plan and it appears that no justification will be given in the new Local Plan. So how will the national requirements be demonstrated? South Gloucestershire should rethink. If it has to identify sites for major new development additional to North Yate they should be in areas close to the new M4 Junction 18A, rather than in Iron Acton (which is separated from it by a railway line, the River Frome and unspoilt Green Belt).<br><br>**(d) Design of New Development:**<br><br>I welcome South Gloucestershire's commitment to a "master-planning" approach to strategic developments "in Consultation with local and community interests" and to setting out clearly exactly where it proposes new development should occur. But in villages and other non-urban settlements the design of smaller, non-strategic developments is just as important. This includes paying close attention to the shape, scale and appearance of development to ensure it sits harmoniously within its context. Historic England has pointed out that from Roman times buildings in the West of England have used local stone and other materials giving a characteristic look and feel to our historic settlements. In Iron Acton local pennant stone was the most commonly used material along with oak structural timbers. Even the name, Iron Acton, means village of oak. This "local vernacular" should be reflected in the design of any new developments, large or small, in Iron Acton Parish.<br><br>I do not agree that the proposed North West Yate development, if it goes ahead, should have a "modernist" feel to match the post 1960's housing in Yate. Even though it is referred to as North West Yate it would be effectively a separate neighbourhood in Iron Acton separated from Yate by the industrial areas East of the Yate Road/Armstrong Way roundabout. If it is to go ahead despite the overwhelming opposition of local people it should at least be designed with reference to local historic building traditions so that the existing beautiful pennant stone buildings and walls in the area are not overwhelmed and turned into historical anomalies by a "modernist" aesthetic.<br><br>I share South Gloucestershire's view that no development should be begun without pre-delivery of essential infrastructure. In Iron Acton Parish that would include increasing transport capacity to avoid worsening the existing congestion and lorry blight on the B4058 Wotton/Bristol Road, and B4059 Yate/Latteridge Road. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Simon Whittard |
| **Comment ID** | 12489153/761 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | SDL - Yate:<br><br>**Urban Localities – Yate:**<br><br>I do not agree that the proposed North West Yate/Iron Acton housing proposal will reduce traffic as suggested in the JSP. Just because it is near Yate, it is not within walking distance as suggested. Yate as an employment centre could not support the number of jobs required by the development, and therefore vehicular traffic would be horrendously increased. Local country lanes would become saturated and dangerously overcrowded beyond capacity. The local rural feel would be lost. Local quiet lanes would be lost. Commuting traffic would be increased beyond a tolerable level, and recreational use of local lanes, such as dog-walking, cycling and horse riding would be exposed to dangerous levels of speeding traffic as commuters try to avoid congestion at pinch points.<br><br>I welcome the proposed "whole town" approach to future planning for Yate but do not support the inclusion of the proposed North West Yate Strategic Development Location in this. In the absence of credible evidence that the Yate/Chipping Sodbury/Coalpit Heath area needs the proposed 50% increase in housing stock (over 20 years, meaning an unprecedented 2.5% average annual population increase), and in the absence of credible evidence that building in the Green Belt is justified and the most sustainable option, the North West Yate proposal should not proceed. |

| | |
|---|---|
| | Any housing growth should be directed to areas within the Shortwood and Pucklechurch areas where much of the land has already been put forward for development by the owners under the “Call for Sites.”<br><br>I support the suggested “Western Gateway” around Yate Railway Station and the aim of more intensive and mixed use of the employment areas within the Parish (in particular the Industrial Estates East of the Yate/Armstrong Road Roundabout). As part of this steps should be taken to reduce the impact of heavy goods traffic on homes on the B4058 Wotton/Bristol Road and the B4059 Yate/Latteridge Road, principally by supporting proposals for the new M4 Junction 18A and encouraging Heavy Goods Vehicles to use that route. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sovereign Housing Association |
| **Comment ID** | 16477825/773 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **Representations to the South Gloucestershire Local Plan April 2018:**<br><br>**In regard of Land at Mount Pleasant Farm, Longwell Green:**<br><br>We represent the owners of circa 60 acres of land known as Mount Pleasant Farm, Longwell Green.<br><br>The land has previously been promoted to the Council at earlier stages of Plan preparation including to the Issues and Options Consultation, January 2016 (Ref SG000061). In this instance the Representation was submitted solely on behalf of the land owner, Sovereign Housing Association. However, in other instances, such as the JSP Representations submitted January 2018, the site has been promoted in conjunction with the adjacent land owned by ATA Estates.<br><br>It remains the case that the two parcels of land are being promoted together and a comprehensive masterplan and Evidence Base is currently being prepared by a Consultant Team for submission to the Council as a response to the Local Plan Consultation.<br><br>However, Sovereign Housing Association, as freehold owners of the Land Rear of Mount Pleasant Farm, wish to ensure that the land within their ownership is clearly promoted to the Council in order to protect their commercial positon in relation to the land and potential for development.<br><br>Therefore, this representation, and the associated Call for Sites Submission, is provided as supplementary evidence as to the availability of Land at Longwell Green, which is suitable and deliverable for development in its own right.<br><br>The promoted land could be delivered as a stand-alone development, utilising an access retained through the Spring Acres development which is being progressed on land to the North East at present. However, a wider masterplan, including land owned by ATA Estates would, as demonstrated by the masterplanning prepared in association with the wider Representation, provide additional benefits to the local community given the additional land and access that the adjacent land would provide.<br><br>It is anticipated that the Land Rear of Mount Pleasant Farm alone might deliver circa 350 dwellings, accessed from the A431 via land within the ownership of our Client. This would mean that the potential development location would be considered as Non-Strategic Growth as defined in the SGLP Consultation Document.<br><br>Therefore, this Representation addresses the Questions relevant to Non-Strategic Growth in that Document, as set out on Page 71. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Robert and Diana Pardoe |
| **Comment ID** | 10784545/807 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **(a) Engagement with Local Councils:**<br><br>Before the next stage of producing the new Local Plan South Gloucestershire should tap into local knowledge in Iron Acton about the significance locally of particular sites and areas, their sustainability, land ownership, historic or ecological value etc. This should be a genuine reaching-out to local people rather than simply general “drop-in” events. This would be consistent with the spirit of the South Gloucestershire Statement of Community Involvement and alert the Authority to issues of particular local sensitivity or concern.<br><br>**(b) M4 Junction 18A:**<br><br>The decision in March 2018 by South Gloucestershire Cabinet Members to recommend the Lyde Green option for the new Junction 18A on the M4 following the public Consultation in 2017 means that Highways England is now in a position to make a firm recommendation to the Department for Transport on its location. The new Junction should include a link to Yate. It would change significantly the relative sustainability of different locations in the Yate/Chipping Sodbury area. This should be taken into account in the new Local Plan and in the Joint Spatial Plan. Failure to do so will undermine both Plans and render them unsound. |

| | |
|---|---|
| | **(c) General Approach Proposed for the Local Plan:**<br><br>I agree that the starting point should be the completion of existing, agreed Core Strategy developments in South Gloucestershire, and that priority should be given to urban renewal and maximising the use of Brownfield land in Yate/Chipping Sodbury in order to minimise loss of Greenfield land. This would include proceeding with the North Yate New Neighbourhood which would provide up to 3,000 new homes for Yate.<br><br>Although it is 12 years since the North Yate New Neighbourhood was agreed nothing has been built. This means that there is no justification for the further proposal for 2,000 homes in the neighbouring North West Yate location. North West Yate should not proceed in the absence of clear evidence that there is a demand for another 4,000 homes in the Yate, Chipping Sodbury and Coalpit Heath area. Over-supply of development sites will simply encourage developers to cherry-pick the easiest ones resulting in a piecemeal approach rather than the "master-planning" South Gloucestershire says it wants.<br><br>I also object strongly to siting the proposed North West Yate development in the Iron Acton Green Belt without demonstrating the "exceptional circumstances" required by National Guidance. No justification is given in the Draft Joint Spatial Plan and it appears that no justification will be given in the new Local Plan. So how will the national requirements be demonstrated? South Gloucestershire should rethink. If it has to identify sites for major new development additional to North Yate they should be in areas close to the new M4 Junction 18A, rather than in Iron Acton (which is separated from it by a railway line, the River Frome and unspoilt Green Belt).<br><br>**(d) Design of New Development:**<br><br>I welcome South Gloucestershire's commitment to a "master-planning" approach to strategic developments "in Consultation with local and community interests" and to setting out clearly exactly where it proposes new development should occur. But in villages and other non-urban settlements the design of smaller, non-strategic developments is just as important. This includes paying close attention to the shape, scale and appearance of development to ensure it sits harmoniously within its context. Historic England has pointed out that from Roman times buildings in the West of England have used local stone and other materials giving a characteristic look and feel to our historic settlements. In Iron Acton local pennant stone was the most commonly used material along with oak structural timbers. Even the name, Iron Acton, means village of oak. This "local vernacular" should be reflected in the design of any new developments, large or small, in Iron Acton Parish.<br><br>I do not agree that the proposed North West Yate development, if it goes ahead, should have a "modernist" feel to match the post 1960's housing in Yate. Even though it is referred to as North West Yate it would be effectively a separate neighbourhood in Iron Acton separated from Yate by the industrial areas East of the Yate Road/Armstrong Way roundabout. If it is to go ahead despite the overwhelming opposition of local people it should at least be designed with reference to local historic building traditions so that the existing beautiful pennant stone buildings and walls in the area are not overwhelmed and turned into historical anomalies by a "modernist" aesthetic.<br><br>I share South Gloucestershire's view that no development should be begun without pre-delivery of essential infrastructure. In Iron Acton Parish that would include increasing transport capacity to avoid worsening the existing congestion and lorry blight on the B4058 Wotton/Bristol Road, and B4059 Yate/Latteridge Road. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Robert and Diana Pardoe |
| **Comment ID** | 10784545/808 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | SDL - Yate:<br><br>**Urban Localities – Yate:**<br><br>I welcome the proposed "whole town" approach to future planning for Yate but do not support the inclusion of the proposed North West Yate Strategic Development Location in this. In the absence of credible evidence that the Yate/Chipping Sodbury/Coalpit Heath area needs the proposed 50% increase in housing stock (over 20 years, meaning an unprecedented 2.5% average annual population increase), and in the absence of credible evidence that building in the Green Belt is justified and the most sustainable option, the North West Yate proposal should not proceed.<br><br>I support the suggested "Western Gateway" around Yate Railway Station and the aim of more intensive and mixed use of the employment areas within the Parish (in particular the Industrial Estates East of the Yate/Armstrong Road Roundabout). As part of this steps should be taken to reduce the impact of heavy goods traffic on homes on the B4058 Wotton/Bristol Road and the B4059 Yate/Latteridge Road, principally by supporting proposals for the new M4 Junction 18A and encouraging Heavy Goods Vehicles to use that route. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | SPM Homes Ltd |
| **Comment ID** | 19732097/818 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Other; Non-Strategic Development in the rest of South Gloucestershire: |

| | |
|---|---|
| | The JSP has identified a need for 1,300 new homes in the rural areas of South Gloucestershire (plus 500 contingency). It is not accepted that the Strategic Locations for growth (Yate, Charfield, Thornbury and Coalpit Heath) will necessarily deliver the projected requirement of 6,000 homes during the Plan Period. The delivery of Strategic Sites comprises comparatively large urban extension Strategic Allocations (as yet not allocated). History within other Local Authority areas suggest that delivery of large Strategic Sites is slow and uncertain. As such whilst the 'pro-growth' Polices of the Draft Plan are supported, it is questioned whether the split between strategic and non-strategic delivery is the correct one.<br><br>I submit that to create a workable and defensible Plan which has the ability and agility to deliver homes where people want to live the number of homes to be delivered via non-strategic allocations should be significantly increased. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Brian Hackland |
| **Comment ID** | 8354337/824 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **(a) Engagement With Local Councils:**<br><br>The Consultations on the Draft Joint Spatial Strategy were flawed in failing properly to alert Iron Acton residents to proposals for large scale development in their Parish. Before the next stage of producing the new Local Plan South Gloucestershire should tap into local knowledge in Iron Acton about the significance locally of particular sites and areas, their sustainability, land ownership, historic or ecological value etc. This should be a genuine reaching-out to local people rather than simply general "drop-in" events. This would be consistent with the spirit of the South Gloucestershire Statement of Community Involvement and alert the Authority to issues of particular local sensitivity or concern. Iron Acton Parish Council should be approached to facilitate such engagement.<br><br>**(b) M4 Junction 18A:**<br><br>This Consultation Document fails properly to take into account the proposals for a new Junction 18A on the M4. The decision in March 2018 by South Gloucestershire Cabinet Members to recommend the Lyde Green option for the new Junction 18A on the M4 following the public Consultation in 2017 means that Highways England is now in a position to make a firm recommendation to the Department for Transport on its location. All expectations are that that will be Lyde Green. It is proposed that the new Junction should include a link to Yate. This would change significantly the relative sustainability of different locations in the Yate/Chipping Sodbury area. This should be taken into account in the new Local Plan and in the Joint Spatial Plan (at Inquiry). Failure to do so will undermine both Plans and render them unsound. Proceeding with the proposed North West Yate Strategic Development despite the building of Junction 18A would be perverse and profoundly unsustainable.<br><br>**(c) General Approach Proposed for the Local Plan:**<br><br>It makes sense to include in the Local Plan, in the absence of unforeseen changes, existing, agreed Core Strategy developments in South Gloucestershire. I agree, too, that priority should be given to urban renewal and maximising the use of Brownfield land in Yate/Chipping Sodbury in order to minimise loss of Greenfield land. This would include proceeding with the North Yate New Neighbourhood which would provide up to 3,000 new homes for Yate. Development in the Green Belt should always be a last resort and as the National Planning Policy Framework makes clear, only where exceptional circumstances apply.<br><br>Although it is 12 years since the North Yate New Neighbourhood was agreed nothing has been built. This means that there is no justification for proposing a further 2,000 homes in the neighbouring North West Yate location. North West Yate should not proceed in the absence of clear evidence that there is a demand for another 4,000 homes in the Yate, Chipping Sodbury and Coalpit Heath area over the Plan Period. Over-supply of development sites will simply encourage developers to cherry-pick the easiest ones resulting in a piecemeal approach rather than the "master-planning" South Gloucestershire says it wants.<br><br>I also object strongly to siting the proposed North West Yate development in the Iron Acton Green Belt without demonstrating the "exceptional circumstances" required by National Planning Guidance. No justification for choosing a Green Belt location is given in the Draft Joint Spatial Plan and it appears that no justification will be given in the new Local Plan. So how will the national Planning Policy requirements be demonstrated? South Gloucestershire should rethink. If it has to identify sites for major new development additional to North Yate they should be in areas close to the new M4 Junction 18A, rather than in Iron Acton (which is separated from it by a railway line, the River Frome and unspoilt Green Belt land). Failing that both the Joint Spatial Strategy and the Local Plan will be non-compliant.<br><br>**(d) Design of New Development:**<br><br>Allowing piecemeal development leads to intrusive, incoherent development so I welcome South Gloucestershire's commitment to a "master-planning" approach to strategic developments "in Consultation with local and community interests" and to setting out clearly exactly where it proposes new development should occur. But in villages and other non-urban settlements the design of smaller, non-strategic developments is just as important. This includes paying close attention to the shape, scale and appearance of development to ensure it sits harmoniously within its context. Historic England has pointed out that from Roman times buildings in the West of England have used local stone and other materials giving a characteristic look and feel to our historic settlements. In Iron Acton, local pennant stone was the most commonly used material along with oak structural timbers. Even the name, Iron Acton, means village of oak. This "local vernacular" should be reflected in the design of any new developments, large or small, in Iron Acton Parish. Recent small-scale developments in Iron Acton Village, Frampton Cotterell and Rangeworthy have shown that this can be done without compromising the economic viability of development.<br><br>I do not agree that the proposed North West Yate development, if it goes ahead, should have a "modernist" feel to match the post 1960's housing in Yate. Even though it is referred to as North West Yate it would be effectively a separate neighbourhood in Iron Acton separated from Yate by the industrial areas East of the Yate Road/Armstrong Way roundabout. If it is to go ahead despite the overwhelming opposition of local people it |

| | |
|---|---|
| | should at least be designed with reference to local historic building traditions so that the existing beautiful pennant stone buildings and walls in the area are not overwhelmed and turned into historical anomalies by a ”modernist” aesthetic. Additionally, should North West Yate proceed, South Gloucestershire should take active steps to using Planning Conditions to protect existing historic structures in the area, including inviting Historic England to review whether or not to add to existing Listings of structures in the proposed development area.<br><br>I share South Gloucestershire’s view that no development should be begun without pre-delivery of essential infrastructure. In Iron Acton Parish that would include increasing transport capacity to avoid worsening the existing congestion and lorry blight on the B4058 Wotton/Bristol Road, and B4059 Yate/Latteridge Road. It should include the building of the long promised Frampton Cotterell/Winterbourne Bypass. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Brian Hackland |
| **Comment ID** | 8354337/825 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | SDL - Yate:<br><br>**Urban Localities – Yate:**<br><br>I welcome the proposed “whole town” approach to future planning for Yate but do not support the inclusion of the proposed North West Yate Strategic Development Location in this. In the absence of credible evidence that the Yate/Chipping Sodbury/Coalpit Heath area needs the proposed 50% increase in housing stock over 20 years (necessitating an implied, unprecedented 2.5% average annual population increase – compared to a 1% p.a. average for South Gloucestershire as a whole over the past 25 years), and in the absence of credible evidence that building in the Green Belt is justified and the most sustainable option, the North West Yate proposal should not proceed and should not be included in the Draft Local Plan ahead of recommendations by the Joint Spatial Plan Inspector and a decision by the Secretary of State.<br><br>I support the suggested “Western Gateway” around Yate Railway Station (within the existing urban settlement of Yate) and the aim of more intensive and mixed use of the employment areas within Yate and Iron Acton Parish (in particular the Industrial Estates East of the Yate/ Armstrong Road Roundabout). As part of this steps should be taken to reduce the impact of heavy goods traffic on homes on the B4058 Wotton/ Bristol Road and the B4059 Yate/Latteridge Road, principally by supporting proposals for the new M4 Junction 18A and encouraging Heavy Goods Vehicles to use that route. Continuing to ignore plans for the new Junction in proposals for the new Local Plan will render it redundant and tie the hands of South Gloucestershire in ensuring that post-Junction development occurs in the most sustainable locations. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anna Webster |
| **Comment ID** | 19843617/835 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **(a) Engagement With Local Councils:**<br><br>Before the next stage of producing the new Local Plan South Gloucestershire should tap into local knowledge in Iron Acton about the significance locally of particular sites and areas, their sustainability, land ownership, historic or ecological value etc. This should be a genuine reaching-out to local people rather than simply general “drop-in” events. This would be consistent with the spirit of the South Gloucestershire Statement of Community Involvement and alert the Authority to issues of particular local sensitivity or concern.<br><br>**(b) M4 Junction 18A:**<br><br>The decision in March 2018 by South Gloucestershire Cabinet Members to recommend the Lyde Green option for the new Junction 18A on the M4 following the public Consultation in 2017 means that Highways England is now in a position to make a firm recommendation to the Department for Transport on its location. The new Junction should include a link to Yate. It would change significantly the relative sustainability of different locations in the Yate/Chipping Sodbury area. This should be taken into account in the new Local Plan and in the Joint Spatial Plan. Failure to do so will undermine both Plans and render them unsound.<br><br>**(c) General Approach Proposed for the Local Plan:**<br><br>I agree that the starting point should be the completion of existing, agreed Core Strategy developments in South Gloucestershire, and that priority should be given to urban renewal and maximising the use of Brownfield land in Yate/Chipping Sodbury in order to minimise loss of Greenfield land. This would include proceeding with the North Yate New Neighbourhood which would provide up to 3,000 new homes for Yate.<br><br>Although it is 12 years since the North Yate New Neighbourhood was agreed nothing has been built. This means that there is no justification for the further proposal for 2,000 homes in the neighbouring North West Yate location. North West Yate should not proceed in the absence of clear evidence that there is a demand for another 4,000 homes in the Yate, Chipping Sodbury and Coalpit Heath area. Over-supply of development sites will simply encourage developers to cherry-pick the easiest ones resulting in a piecemeal approach rather than the “master-planning” South Gloucestershire says it wants. |

| | |
|---|---|
| | I also object strongly to siting the proposed North West Yate development in the Iron Acton Green Belt without demonstrating the "exceptional circumstances" required by National Guidance. No justification is given in the Draft Joint Spatial Plan and it appears that no justification will be given in the new Local Plan. So how will the national requirements be demonstrated? South Gloucestershire should rethink. If it has to identify sites for major new development additional to North Yate they should be in areas close to the new M4 Junction 18A, rather than in Iron Acton (which is separated from it by a railway line, the River Frome and unspoilt Green Belt).<br><br>**(d) Design of New Development:**<br><br>I welcome South Gloucestershire's commitment to a "master-planning" approach to strategic developments "in Consultation with local and community interests" and to setting out clearly exactly where it proposes new development should occur. But in villages and other non-urban settlements the design of smaller, non-strategic developments is just as important. This includes paying close attention to the shape, scale and appearance of development to ensure it sits harmoniously within its context. Historic England has pointed out that from Roman times buildings in the West of England have used local stone and other materials giving a characteristic look and feel to our historic settlements. In Iron Acton local pennant stone was the most commonly used material along with oak structural timbers. Even the name, Iron Acton, means village of oak. This "local vernacular" should be reflected in the design of any new developments, large or small, in Iron Acton Parish.<br><br>I do not agree that the proposed North West Yate development, if it goes ahead, should have a "modernist" feel to match the post 1960's housing in Yate. Even though it is referred to as North West Yate it would be effectively a separate neighbourhood in Iron Acton separated from Yate by the industrial areas East of the Yate Road/Armstrong Way roundabout. If it is to go ahead despite the overwhelming opposition of local people it should at least be designed with reference to local historic building traditions so that the existing beautiful pennant stone buildings and walls in the area are not overwhelmed and turned into historical anomalies by a "modernist" aesthetic.<br><br>I share South Gloucestershire's view that no development should be begun without pre-delivery of essential infrastructure. In Iron Acton Parish that would include increasing transport capacity to avoid worsening the existing congestion and lorry blight on the B4058 Wotton/Bristol Road, and B4059 Yate/Latteridge Road. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anna Webster |
| **Comment ID** | 19843617/836 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | SDL - Yate:<br><br>**Urban Localities – Yate:**<br><br>I welcome the proposed "whole town" approach to future planning for Yate but do not support the inclusion of the proposed North West Yate Strategic Development Location in this. In the absence of credible evidence that the Yate/Chipping Sodbury/Coalpit Heath area needs the proposed 50% increase in housing stock (over 20 years, meaning an unprecedented 2.5% average annual population increase), and in the absence of credible evidence that building in the Green Belt is justified and the most sustainable option, the North West Yate proposal should not proceed.<br><br>I support the suggested "Western Gateway" around Yate Railway Station and the aim of more intensive and mixed use of the employment areas within the Parish (in particular the Industrial Estates East of the Yate/Armstrong Road Roundabout). As part of this steps should be taken to reduce the impact of heavy goods traffic on homes on the B4058 Wotton/Bristol Road and the B4059 Yate/Latteridge Road, principally by supporting proposals for the new M4 Junction 18A and encouraging Heavy Goods Vehicles to use that route. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Victoria & John Vlietstra |
| **Comment ID** | 19843937/846 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **(a) Engagement With Local Councils:**<br><br>Before the next stage of producing the new Local Plan South Gloucestershire should extract local knowledge in Iron Acton about the significance locally of particular sites and areas, their sustainability, land ownership, historic or ecological value etc. This should be a genuine reaching-out to local people rather than simply general "drop-in" events. This would be consistent with the spirit of the South Gloucestershire Statement of Community Involvement and alert the Authority to issues of particular local sensitivity or concern.<br><br>**(b) M4 Junction 18A:**<br><br>The decision in March 2018 by South Gloucestershire Cabinet Members to recommend the Lyde Green option for the new Junction 18A on the M4 following the public Consultation in 2017 means that Highways England is now in a position to make a firm recommendation to the Department for Transport on its location. The new Junction should include a link to Yate. It would change significantly the relative sustainability of different locations in the Yate/Chipping Sodbury area. This should be taken into account in the new Local Plan and in the Joint Spatial Plan. Failure to do so will undermine both Plans and render them unsound. |

| | |
|---|---|
| | **(c) General Approach Proposed for the Local Plan:**<br><br>We agree that the starting point should be the completion of existing, agreed Core Strategy developments in South Gloucestershire, and that priority should be given to urban renewal and maximising the use of Brownfield land in Yate/Chipping Sodbury in order to minimise loss of Greenfield land. This would include proceeding with the North Yate New Neighbourhood, which would provide up to 3,000 new homes for Yate.<br><br>Although it is 12 years since the North Yate New Neighbourhood was agreed nothing has been built. This means that there is no justification for the further proposal for 2,000 homes in the neighbouring North West Yate location. North West Yate should not proceed in the absence of clear evidence that there is a demand for another 4,000 homes in the Yate, Chipping Sodbury and Coalpit Heath areas. Over-supply of development sites will basically encourage developers to cherry-pick the easiest ones resulting in a piecemeal approach rather than the "master-planning" South Gloucestershire states it wants.<br><br>We also strongly object to siting the proposed North West Yate development in the Iron Acton Green Belt without demonstrating the "exceptional circumstances" required by National Guidance. No justification is given in the Draft Joint Spatial Plan and it appears that no justification will be given in the new Local Plan. So how will the national requirements be demonstrated? South Gloucestershire should rethink. If it has to identify sites for major new development additional to North Yate they should be in areas close to the new M4 Junction 18A, rather than in Iron Acton (which is separated from it by a railway line, the River Frome and unspoilt Green Belt).<br><br>**(d) Design of New Development:**<br><br>We welcome South Gloucestershire's commitment to a "master-planning" approach to strategic developments "in Consultation with local and community interests" and to setting out clearly exactly where it proposes new development should occur. But in villages and other non-urban settlements the design of smaller, non-strategic developments is just as important. This includes paying close attention to the shape, scale and appearance of development to ensure it sits harmoniously within its context. Historic England has pointed out that from Roman times buildings in the West of England have used local stone and other materials giving a characteristic look and feel to our historic settlements. In Iron Acton local pennant stone was the most commonly used material along with oak structural timbers. Even the name, Iron Acton, means village of oak. This "local vernacular" should be reflected in the design of any new developments, large or small, in Iron Acton Parish.<br><br>We do not agree that the proposed North West Yate development, if it goes ahead, should have a "modernist" feel to match the post 1960's housing in Yate. Even though it is referred to as North West Yate it would be effectively a separate neighbourhood in Iron Acton separated from Yate by the industrial areas East of the Yate Road/Armstrong Way roundabout. If it is to go ahead despite the overwhelming opposition of local people it should at least be designed with reference to local historic building traditions so that the existing beautiful pennant stone buildings and walls in the area are not overwhelmed and turned into historical anomalies by a "modernist" aesthetic.<br><br>We share South Gloucestershire's view that no development should be begun without pre-delivery of essential infrastructure. In Iron Acton Parish that would include increasing transport capacity to avoid worsening the existing congestion and lorry blight on the B4058 Wotton/Bristol Road, and B4059 Yate/Latteridge Road. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Victoria & John Vlietstra |
| **Comment ID** | 19843937/847 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | SDL - Yate:<br><br>**Urban Localities – Yate:**<br><br>We welcome the proposed "whole town" approach to future planning for Yate but do not support the inclusion of the proposed North West Yate Strategic Development Location in this. In the absence of credible evidence that the Yate/Chipping Sodbury/Coalpit Heath area needs the proposed 50% increase in housing stock (over 20 years, meaning an unprecedented 2.5% average annual population increase), and in the absence of credible evidence that building in the Green Belt is justified and the most sustainable option, the North West Yate proposal should not proceed.<br><br>We support the suggested "Western Gateway" around Yate Railway Station and the aim of more intensive and mixed use of the employment areas within the Parish (in particular the Industrial Estates East of the Yate/Armstrong Road Roundabout). As part of this steps should be taken to reduce the impact of heavy goods traffic on homes on the B4058 Wotton/Bristol Road and the B4059 Yate/Latteridge Road, principally by supporting proposals for the new M4 Junction 18A and encouraging Heavy Goods Vehicles to use that route. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christina Fussell |
| **Comment ID** | 19843969/857 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **(a) Engagement With Local Councils:** |

| | |
|---|---|
| | Before the next stage of producing the new Local Plan South Gloucestershire should tap into local knowledge in Iron Acton about the significance locally of particular sites and areas, their sustainability, land ownership, historic or ecological value etc. This should be a genuine reaching-out to local people rather than simply general "drop-in" events. They should use this to address the very real concerns felt by local people about the impact this major development would have on almost all impacts of their lives, especially with regard to loss of Green Belt, increased traffic and the amalgamation of small villages into sprawling towns, that increase people's isolation and change their village community forever.<br><br>This would be consistent with the spirit of the South Gloucestershire Statement of Community Involvement and alert the Authority to issues of particular local sensitivity or concern.<br><br>**(b) M4 Junction 18A:**<br><br>The decision in March 2018 by South Gloucestershire Cabinet Members to recommend the Lyde Green option for the new Junction 18A on the M4 following the public Consultation in 2017 means that Highways England is now in a position to make a firm recommendation to the Department for Transport on its location. The new Junction should include a link to Yate. It would change significantly the relative sustainability of different locations in the Yate/Chipping Sodbury area. This should be taken into account in the new Local Plan and in the Joint Spatial Plan. Failure to do so will undermine both Plans and render them unsound.<br><br>**(c) General Approach Proposed for the Local Plan:**<br><br>I agree that the starting point should be the completion of existing, agreed Core Strategy developments in South Gloucestershire, and that priority should be given to urban renewal and maximising the use of Brownfield land in Yate/Chipping Sodbury in order to minimise loss of Greenfield land. This would include proceeding with the North Yate New Neighbourhood which would provide up to 3,000 new homes for Yate.<br><br>Although it is 12 years since the North Yate New Neighbourhood was agreed nothing has been built. This means that there is no justification for the further proposal for 2,000 homes in the neighbouring North West Yate location. North West Yate should not proceed in the absence of clear evidence that there is a demand for another 4,000 homes in the Yate, Chipping Sodbury and Coalpit Heath area. Over-supply of development sites will simply encourage developers to cherry-pick the easiest ones resulting in a piecemeal approach rather than the "master-planning" South Gloucestershire says it wants.<br><br>I also object strongly to siting the proposed North West Yate development in the Iron Acton Green Belt without demonstrating the "exceptional circumstances" required by National Guidance. No justification is given in the Draft Joint Spatial Plan and it appears that no justification will be given in the new Local Plan. So how will the national requirements be demonstrated? South Gloucestershire should rethink. If it has to identify sites for major new development additional to North Yate they should be in areas close to the new M4 Junction 18A, rather than in Iron Acton (which is separated from it by a railway line, the River Frome and unspoilt Green Belt).<br><br>I believe South Gloucestershire should communicate their reasons for choosing Iron Acton above all the other sites that were under consideration. Again in the spirit of their supposed commitment to community engagement and involvement. To inform local residents of their decision with no logical explanation as to why this area represents the best option, is at best irresponsible and at worst grossly negligent in their representation of the residents in the locality.<br><br>**(d) Design of New Development:**<br><br>I welcome South Gloucestershire's commitment to a "master-planning" approach to strategic developments "in Consultation with local and community interests" and to setting out clearly exactly where it proposes new development should occur. But in villages and other non-urban settlements the design of smaller, non-strategic developments is just as important. This includes paying close attention to the shape, scale and appearance of development to ensure it sits harmoniously within its context. Historic England has pointed out that from Roman times buildings in the West of England have used local stone and other materials giving a characteristic look and feel to our historic settlements. In Iron Acton local pennant stone was the most commonly used material along with oak structural timbers. Even the name, Iron Acton, means village of oak. This "local vernacular" should be reflected in the design of any new developments, large or small, in Iron Acton Parish.<br><br>I strongly oppose the view that the proposed North West Yate development, if it goes ahead, should have a "modernist" feel to match the post 1960's housing in Yate. Even though it is referred to as North West Yate it would be effectively a separate neighbourhood in Iron Acton a small, historical and locally important village (mentioned in the Doomsday Book), separated from Yate by the industrial areas East of the Yate Road/ Armstrong Way roundabout. If it is to go ahead despite the absolute, overwhelming opposition of local people, it should at least be designed with reference to local historic building traditions so that the existing beautiful pennant stone buildings and walls in the area are not overwhelmed and turned into historical anomalies by a "modernist" and inappropriate, aesthetic.<br><br>I share South Gloucestershire's view that no development should be begun without pre-delivery of essential infrastructure. In Iron Acton Parish that would include increasing transport capacity to avoid worsening the existing congestion and lorry blight on the B4058 Wotton/Bristol Road, and B4059 Yate/Latteridge Road. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Christina Fussell |
| **Comment ID** | 19843969/858 |
| **Document Part Name** | Question 19 Other Comments |

| | |
|---|---|
| **Comment** | SDL - Yate:<br><br>**Urban Localities – Yate:**<br><br>I welcome the proposed "whole town" approach to future planning for Yate but do not support the inclusion of the proposed North West Yate Strategic Development Location in this. In the absence of credible evidence that the Yate/Chipping Sodbury/Coalpit Heath area needs the proposed 50% increase in housing stock (over 20 years, meaning an unprecedented 2.5% average annual population increase), and in the absence of credible evidence that building in the Green Belt is justified and the most sustainable option, the North West Yate proposal should not proceed.<br><br>I support the suggested "Western Gateway" around Yate Railway Station and the aim of more intensive and mixed use of the employment areas within the Parish (in particular the Industrial Estates East of the Yate/Armstrong Road Roundabout). As part of this steps should be taken to reduce the impact of heavy goods traffic on homes on the B4058 Wotton/Bristol Road and the B4059 Yate/Latteridge Road, principally by supporting proposals for the new M4 Junction 18A and encouraging Heavy Goods Vehicles to use that route. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Paul Fussell |
| **Comment ID** | 19844001/868 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **(a) Engagement With Local Councils:**<br><br>Before the next stage of producing the new Local Plan South Gloucestershire should tap into local knowledge in Iron Acton about the significance locally of particular sites and areas, their sustainability, land ownership, historic or ecological value etc. This should be a genuine reaching-out to local people rather than simply general "drop-in" events. They should use this to address the very real concerns felt by local people about the impact this major development would have on almost all impacts of their lives, especially with regard to loss of Green Belt, increased traffic and the amalgamation of small villages into sprawling towns, that increase people's isolation and change their village community forever.<br><br>This would be consistent with the spirit of the South Gloucestershire Statement of Community Involvement and alert the Authority to issues of particular local sensitivity or concern.<br><br>**(b) M4 Junction 18A:**<br><br>The decision in March 2018 by South Gloucestershire Cabinet Members to recommend the Lyde Green option for the new Junction 18A on the M4 following the public Consultation in 2017 means that Highways England is now in a position to make a firm recommendation to the Department for Transport on its location. The new Junction should include a link to Yate. It would change significantly the relative sustainability of different locations in the Yate/Chipping Sodbury area. This should be taken into account in the new Local Plan and in the Joint Spatial Plan. Failure to do so will undermine both Plans and render them unsound.<br><br>**(c) General Approach Proposed for the Local Plan:**<br><br>I agree that the starting point should be the completion of existing, agreed Core Strategy developments in South Gloucestershire, and that priority should be given to urban renewal and maximising the use of Brownfield land in Yate/Chipping Sodbury in order to minimise loss of Greenfield land. This would include proceeding with the North Yate New Neighbourhood which would provide up to 3,000 new homes for Yate.<br><br>Although it is 12 years since the North Yate New Neighbourhood was agreed nothing has been built. This means that there is no justification for the further proposal for 2,000 homes in the neighbouring North West Yate location. North West Yate should not proceed in the absence of clear evidence that there is a demand for another 4,000 homes in the Yate, Chipping Sodbury and Coalpit Heath area. Over-supply of development sites will simply encourage developers to cherry-pick the easiest ones resulting in a piecemeal approach rather than the "master-planning" South Gloucestershire says it wants.<br><br>I also object strongly to siting the proposed North West Yate development in the Iron Acton Green Belt without demonstrating the "exceptional circumstances" required by National Guidance. No justification is given in the Draft Joint Spatial Plan and it appears that no justification will be given in the new Local Plan. So how will the national requirements be demonstrated? South Gloucestershire should rethink. If it has to identify sites for major new development additional to North Yate they should be in areas close to the new M4 Junction 18A, rather than in Iron Acton (which is separated from it by a railway line, the River Frome and unspoilt Green Belt).<br><br>I believe South Gloucestershire should communicate their reasons for choosing Iron Acton above all the other sites that were under consideration. Again in the spirit of their supposed commitment to community engagement and involvement. To inform local residents of their decision with no logical explanation as to why this area represents the best option, is at best irresponsible and at worst grossly negligent in their representation of the residents in the locality.<br><br>**(d) Design of New Development:** |

| | |
|---|---|
| | I welcome South Gloucestershire's commitment to a "master-planning" approach to strategic developments "in Consultation with local and community interests" and to setting out clearly exactly where it proposes new development should occur. But in villages and other non-urban settlements the design of smaller, non-strategic developments is just as important. This includes paying close attention to the shape, scale and appearance of development to ensure it sits harmoniously within its context. Historic England has pointed out that from Roman times buildings in the West of England have used local stone and other materials giving a characteristic look and feel to our historic settlements. In Iron Acton local pennant stone was the most commonly used material along with oak structural timbers. Even the name, Iron Acton, means village of oak. This "local vernacular" should be reflected in the design of any new developments, large or small, in Iron Acton Parish.<br><br>I strongly oppose the view that the proposed North West Yate development, if it goes ahead, should have a "modernist" feel to match the post 1960's housing in Yate. Even though it is referred to as North West Yate it would be effectively a separate neighbourhood in Iron Acton a small, historical and locally important village (mentioned in the Doomsday Book), separated from Yate by the industrial areas East of the Yate Road/ Armstrong Way roundabout. If it is to go ahead despite the absolute, overwhelming opposition of local people, it should at least be designed with reference to local historic building traditions so that the existing beautiful pennant stone buildings and walls in the area are not overwhelmed and turned into historical anomalies by a "modernist" and inappropriate, aesthetic.<br><br>I share South Gloucestershire's view that no development should be begun without pre-delivery of essential infrastructure. In Iron Acton Parish that would include increasing transport capacity to avoid worsening the existing congestion and lorry blight on the B4058 Wotton/Bristol Road, and B4059 Yate/Latteridge Road. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Paul Fussell |
| **Comment ID** | 19844001/869 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | SDL - Yate:<br><br>**Urban Localities – Yate:**<br><br>I welcome the proposed "whole town" approach to future planning for Yate but do not support the inclusion of the proposed North West Yate Strategic Development Location in this. In the absence of credible evidence that the Yate/Chipping Sodbury/Coalpit Heath area needs the proposed 50% increase in housing stock (over 20 years, meaning an unprecedented 2.5% average annual population increase), and in the absence of credible evidence that building in the Green Belt is justified and the most sustainable option, the North West Yate proposal should not proceed.<br><br>I support the suggested "Western Gateway" around Yate Railway Station and the aim of more intensive and mixed use of the employment areas within the Parish (in particular the Industrial Estates East of the Yate/Armstrong Road Roundabout). As part of this steps should be taken to reduce the impact of heavy goods traffic on homes on the B4058 Wotton/Bristol Road and the B4059 Yate/Latteridge Road, principally by supporting proposals for the new M4 Junction 18A and encouraging Heavy Goods Vehicles to use that route. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Nigel Button |
| **Comment ID** | 466817/879 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | We have reviewed the Call for Sites Maps and associated supporting information and would like to respond to the Submission for the land submitted by Lower Hazel Farm, BS35 3QP (in particular the land from Down Road to Green Hill Lane and the area leading up to Lower Hazel Farm.<br><br>We own within the submitted area and have rights to shared access and parking. We also own which is wrongly appointed on your Plan and should actually replace Lucy's Mead.<br><br>There are a number of concerns we would like to raise:<br><br>1. The property at Lower Hazel Farm and its curtilage is a Listed property and building too close will cause it to lose its historic appeal. This also including and Primrose Corner that sits within this cartilage.<br><br>2. The historical sites (Quakers Burial Ground and archeology site) located within the woods will also receive a higher foot fall and could result in damage to these historic sites. The Chapel site in Hartygrove Woods is a Conservation site.<br><br>3. If the land is used for residential purposes the building work will have a negative impact on the horses located in our fields at , causing them distress whilst the building work is undertaken. This will also have an impact on the Alpacas the owner of Lower Hazel Farm is looking to purchase on his land. |

| | |
|---|---|
| | 4. The resultant population will increase the foot fall along the Bridle Path which will also cause distress to the horses and the natural Conservation Area.<br><br>5. The resultant traffic, which has already significantly increased since the building of the new homes in Thornbury on the A38 will be amplified causing further tailbacks and congestion in the area.<br><br>6. There is a concern as to the impact on drainage running under our property which is fed to the fields as we have to manage the drainage to stop our garden flooding. We have concerns over the introduction of new houses and the impact on that drainage.<br><br>7. There will be an issue with Noise and light pollution if houses are built changing a rural/idyllic location into a suburban sprawl. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Oliver Fussell |
| **Comment ID** | 10784449/880 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **(a) Engagement With Local Councils:**<br><br>Before the next stage of producing the new Local Plan South Gloucestershire should tap into local knowledge in Iron Acton about the significance locally of particular sites and areas, their sustainability, land ownership, historic or ecological value etc. This should be a genuine reaching-out to local people rather than simply general "drop-in" events. They should use this to address the very real concerns felt by local people about the impact this major development would have on almost all impacts of their lives, especially with regard to loss of Green Belt, increased traffic and the amalgamation of small villages into sprawling towns, that increase people's isolation and change their village community forever.<br><br>This would be consistent with the spirit of the South Gloucestershire Statement of Community Involvement and alert the Authority to issues of particular local sensitivity or concern.<br><br>**(b) M4 Junction 18A:**<br><br>The decision in March 2018 by South Gloucestershire Cabinet Members to recommend the Lyde Green option for the new Junction 18A on the M4 following the public Consultation in 2017 means that Highways England is now in a position to make a firm recommendation to the Department for Transport on its location. The new Junction should include a link to Yate. It would change significantly the relative sustainability of different locations in the Yate/Chipping Sodbury area. This should be taken into account in the new Local Plan and in the Joint Spatial Plan. Failure to do so will undermine both Plans and render them unsound.<br><br>**(c) General Approach Proposed for the Local Plan:**<br><br>I agree that the starting point should be the completion of existing, agreed Core Strategy developments in South Gloucestershire, and that priority should be given to urban renewal and maximising the use of Brownfield land in Yate/Chipping Sodbury in order to minimise loss of Greenfield land. This would include proceeding with the North Yate New Neighbourhood which would provide up to 3,000 new homes for Yate.<br><br>Although it is 12 years since the North Yate New Neighbourhood was agreed nothing has been built. This means that there is no justification for the further proposal for 2,000 homes in the neighbouring North West Yate location. North West Yate should not proceed in the absence of clear evidence that there is a demand for another 4,000 homes in the Yate, Chipping Sodbury and Coalpit Heath area. Over-supply of development sites will simply encourage developers to cherry-pick the easiest ones resulting in a piecemeal approach rather than the "master-planning" South Gloucestershire says it wants.<br><br>I also object strongly to siting the proposed North West Yate development in the Iron Acton Green Belt without demonstrating the "exceptional circumstances" required by National Guidance. No justification is given in the Draft Joint Spatial Plan and it appears that no justification will be given in the new Local Plan. So how will the national requirements be demonstrated? South Gloucestershire should rethink. If it has to identify sites for major new development additional to North Yate they should be in areas close to the new M4 Junction 18A, rather than in Iron Acton (which is separated from it by a railway line, the River Frome and unspoilt Green Belt).<br><br>I believe South Gloucestershire should communicate their reasons for choosing Iron Acton above all the other sites that were under consideration. Again in the spirit of their supposed commitment to community engagement and involvement. To inform local residents of their decision with no logical explanation as to why this area represents the best option, is at best irresponsible and at worst grossly negligent in their representation of the residents in the locality.<br><br>**(d) Design of New Development:**<br><br>I welcome South Gloucestershire's commitment to a "master-planning" approach to strategic developments "in Consultation with local and community interests" and to setting out clearly exactly where it proposes new development should occur. But in villages and other non-urban settlements the design of smaller, non-strategic developments is just as important. This includes paying close attention to the shape, scale and |

| | |
|---|---|
| | appearance of development to ensure it sits harmoniously within its context. Historic England has pointed out that from Roman times buildings in the West of England have used local stone and other materials giving a characteristic look and feel to our historic settlements. In Iron Acton local pennant stone was the most commonly used material along with oak structural timbers. Even the name, Iron Acton, means village of oak. This "local vernacular" should be reflected in the design of any new developments, large or small, in Iron Acton Parish.<br><br>I strongly oppose the view that the proposed North West Yate development, if it goes ahead, should have a "modernist" feel to match the post 1960's housing in Yate. Even though it is referred to as North West Yate it would be effectively a separate neighbourhood in Iron Acton a small, historical and locally important village (mentioned in the Doomsday Book), separated from Yate by the industrial areas East of the Yate Road/ Armstrong Way roundabout. If it is to go ahead despite the absolute, overwhelming opposition of local people, it should at least be designed with reference to local historic building traditions so that the existing beautiful pennant stone buildings and walls in the area are not overwhelmed and turned into historical anomalies by a "modernist" and inappropriate, aesthetic.<br><br>I share South Gloucestershire's view that no development should be begun without pre-delivery of essential infrastructure. In Iron Acton Parish that would include increasing transport capacity to avoid worsening the existing congestion and lorry blight on the B4058 Wotton/Bristol Road, and B4059 Yate/Latteridge Road. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Oliver Fussell |
| **Comment ID** | 10784449/881 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | SDL - Yate:<br><br>**Urban Localities – Yate:**<br><br>I welcome the proposed "whole town" approach to future planning for Yate but do not support the inclusion of the proposed North West Yate Strategic Development Location in this. In the absence of credible evidence that the Yate/Chipping Sodbury/Coalpit Heath area needs the proposed 50% increase in housing stock (over 20 years, meaning an unprecedented 2.5% average annual population increase), and in the absence of credible evidence that building in the Green Belt is justified and the most sustainable option, the North West Yate proposal should not proceed.<br><br>I support the suggested "Western Gateway" around Yate Railway Station and the aim of more intensive and mixed use of the employment areas within the Parish (in particular the Industrial Estates East of the Yate/Armstrong Road Roundabout). As part of this steps should be taken to reduce the impact of heavy goods traffic on homes on the B4058 Wotton/Bristol Road and the B4059 Yate/Latteridge Road, principally by supporting proposals for the new M4 Junction 18A and encouraging Heavy Goods Vehicles to use that route. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tom Barnes |
| **Comment ID** | 19844673/891 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **(a) Engagement With Local Councils:**<br><br>Before the next stage of producing the new Local Plan South Gloucestershire should tap into local knowledge in Iron Acton about the significance locally of particular sites and areas, their sustainability, land ownership, historic or ecological value etc. This should be a genuine reaching-out to local people rather than simply general "drop-in" events. They should use this to address the very real concerns felt by local people about the impact this major development would have on almost all impacts of their lives, especially with regard to loss of Green Belt, increased traffic and the amalgamation of small villages into sprawling towns, that increase people's isolation and change their village community forever.<br><br>This would be consistent with the spirit of the South Gloucestershire Statement of Community Involvement and alert the Authority to issues of particular local sensitivity or concern.<br><br>**(b) M4 Junction 18A:**<br><br>The decision in March 2018 by South Gloucestershire Cabinet Members to recommend the Lyde Green option for the new Junction 18A on the M4 following the public Consultation in 2017 means that Highways England is now in a position to make a firm recommendation to the Department for Transport on its location. The new Junction should include a link to Yate. It would change significantly the relative sustainability of different locations in the Yate/Chipping Sodbury area. This should be taken into account in the new Local Plan and in the Joint Spatial Plan. Failure to do so will undermine both Plans and render them unsound.<br><br>**(c) General Approach Proposed for the Local Plan:** |

| | |
|---|---|
| | I agree that the starting point should be the completion of existing, agreed Core Strategy developments in South Gloucestershire, and that priority should be given to urban renewal and maximising the use of Brownfield land in Yate/Chipping Sodbury in order to minimise loss of Greenfield land. This would include proceeding with the North Yate New Neighbourhood which would provide up to 3,000 new homes for Yate.<br><br>Although it is 12 years since the North Yate New Neighbourhood was agreed nothing has been built. This means that there is no justification for the further proposal for 2,000 homes in the neighbouring North West Yate location. North West Yate should not proceed in the absence of clear evidence that there is a demand for another 4,000 homes in the Yate, Chipping Sodbury and Coalpit Heath area. Over-supply of development sites will simply encourage developers to cherry-pick the easiest ones resulting in a piecemeal approach rather than the "master-planning" South Gloucestershire says it wants.<br><br>I also object strongly to siting the proposed North West Yate development in the Iron Acton Green Belt without demonstrating the "exceptional circumstances" required by National Guidance. No justification is given in the Draft Joint Spatial Plan and it appears that no justification will be given in the new Local Plan. So how will the national requirements be demonstrated? South Gloucestershire should rethink. If it has to identify sites for major new development additional to North Yate they should be in areas close to the new M4 Junction 18A, rather than in Iron Acton (which is separated from it by a railway line, the River Frome and unspoilt Green Belt).<br><br>I believe South Gloucestershire should communicate their reasons for choosing Iron Acton above all the other sites that were under consideration. Again in the spirit of their supposed commitment to community engagement and involvement. To inform local residents of their decision with no logical explanation as to why this area represents the best option, is at best irresponsible and at worst grossly negligent in their representation of the residents in the locality.<br><br>**(d) Design of New Development:**<br><br>I welcome South Gloucestershire's commitment to a "master-planning" approach to strategic developments "in Consultation with local and community interests" and to setting out clearly exactly where it proposes new development should occur. But in villages and other non-urban settlements the design of smaller, non-strategic developments is just as important. This includes paying close attention to the shape, scale and appearance of development to ensure it sits harmoniously within its context. Historic England has pointed out that from Roman times buildings in the West of England have used local stone and other materials giving a characteristic look and feel to our historic settlements. In Iron Acton local pennant stone was the most commonly used material along with oak structural timbers. Even the name, Iron Acton, means village of oak. This "local vernacular" should be reflected in the design of any new developments, large or small, in Iron Acton Parish.<br><br>I strongly oppose the view that the proposed North West Yate development, if it goes ahead, should have a "modernist" feel to match the post 1960's housing in Yate. Even though it is referred to as North West Yate it would be effectively a separate neighbourhood in Iron Acton a small, historical and locally important village (mentioned in the Doomsday Book), separated from Yate by the industrial areas East of the Yate Road/ Armstrong Way roundabout. If it is to go ahead despite the absolute, overwhelming opposition of local people, it should at least be designed with reference to local historic building traditions so that the existing beautiful pennant stone buildings and walls in the area are not overwhelmed and turned into historical anomalies by a "modernist" and inappropriate, aesthetic.<br><br>I share South Gloucestershire's view that no development should be begun without pre-delivery of essential infrastructure. In Iron Acton Parish that would include increasing transport capacity to avoid worsening the existing congestion and lorry blight on the B4058 Wotton/Bristol Road, and B4059 Yate/Latteridge Road. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tom Barnes |
| **Comment ID** | 19844673/892 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | SDL - Yate:<br><br>**Urban Localities – Yate:**<br><br>I welcome the proposed "whole town" approach to future planning for Yate but do not support the inclusion of the proposed North West Yate Strategic Development Location in this. In the absence of credible evidence that the Yate/Chipping Sodbury/Coalpit Heath area needs the proposed 50% increase in housing stock (over 20 years, meaning an unprecedented 2.5% average annual population increase), and in the absence of credible evidence that building in the Green Belt is justified and the most sustainable option, the North West Yate proposal should not proceed.<br><br>I support the suggested "Western Gateway" around Yate Railway Station and the aim of more intensive and mixed use of the employment areas within the Parish (in particular the Industrial Estates East of the Yate/Armstrong Road Roundabout). As part of this steps should be taken to reduce the impact of heavy goods traffic on homes on the B4058 Wotton/Bristol Road and the B4059 Yate/Latteridge Road, principally by supporting proposals for the new M4 Junction 18A and encouraging Heavy Goods Vehicles to use that route. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mike Bennewitz |
| **Comment ID** | 7915073/906 |
| **Document Part Name** | Question 19 Other Comments |

| | |
|---|---|
| **Comment** | Strategic Development Locations: P. 50 & 51 of the Local Plan:<br><br>Please note the online Local Plan Document does not allow Comments online in the specific Section dealing with the above. The issues/Comments are related to the Thornbury Strategic Development Location. Pages 50 & 51 from the Local Plan refers.<br><br>1) The issues of transport and clogging the already full A38 with the transport requirements resulting from the adoption of Buckover as a Strategic Location for development are well stated. However the Local Plan does nothing to commit how those issues will be resolved and even if they can be resolved. It is too lightweight in this regard to be serious. The stock answer to this is 'that's the responsibility of the Joint Transport Strategy.' This should prevent development PERIOD. You will make life intolerable for current and future residents of Thornbury and ruin the jewel of the Severn Valley.<br><br>2) Buckover is simply in the WRONG place. The effects (for example the above) simply cannot be mitigated without ruining Thornbury.<br><br>3) There is no commitment contained within this Plan to make sure the infrastructure issues are adequately addressed before the houses are built. This is just wrong.<br><br>4) There is no effort made within the Local Plan for Thornbury to make sure that Employment and Residential is near each other. This will result in INCREASED car bound journeys with resulting increase in CO2 emissions and congestion.<br><br>5) This is a Local Plan with NO information on how the local area will be developed - just a set of objectives - so where is the detail?<br><br>6) This Plan will not prevent the piecemeal land grab by developers or the ruin of Thornbury due to excess and wrong building locations so it's of questionable value. There is already a Local Plan in existence. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Donna Baber |
| **Comment ID** | 19454785/907 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | I am very concerned about recent coverage in The Week In publication (11 April 2018: http://theweekin.co.uk/back-issues/issue-520-11-apr-2018/) about the Call for Sites where developers have applied to you to start building on large areas of Green Belt land.<br><br>I've tried to read your Document and due to the size of the Document and the complexity of the information contained within, it seems more appropriate for someone who is an expert in Planning Policy and Strategy, rather than a local resident who is concerned about changes to their local area. I note that the information is hard to find within the Document and the use of Maps which are close to illegible make it even harder to corroborate this information. I expect this is a mistake and you would have made it clearer…<br><br>Developing many of the sites in this Article would cause catastrophic damage to animals, plants and habitats in the Green Belt area, would change villages beyond recognition, create untenable transport situations – you only have to look at neighbouring Local Authorities and the damage this is causing in their areas.<br><br>Roads in Upton Cheyney (where one development is suggested) are so poorly maintained (you have tried for years to fix a spring in Brewery Hill and appear now to have given up?) and so heavily used that the village simply would not withstand the additional traffic of 10 new homes. It would really destroy the village to put another Emersons Green style development there. Similarly, building on Green Belt in Oldland Common would be catastrophic on the road system, regardless of whether you put more buses on the road, which appears to be the usual 'answer' which doesn't actually solve the problem, as you know.<br><br>I cannot see any reason whatsoever for building on Green Belt. If you are considering allowing developers to build on Green Belt land; please don't. Once it is destroyed, we will never, ever recover it. Our ecosystems will change beyond recognition, wildlife will be lost and South Gloucestershire will be a worse place to live. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Robert Cole |
| **Comment ID** | 11480641/909 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Part 2: Strategic Development Locations:<br><br>The development of an employment area to the South West of Yate in the Joint Strategic Plan, which would include development up to the South Wales Main Line Railway, and the Mineral Line to the Oil Depot is unacceptable incursion into the Green Belt. |

| | |
|---|---|
| | In particular it would join Yate to the rural village of Westerleigh and remove all of the (small) remaining greenery between Westerleigh and the urban housing of Yate. It would be bad enough if this filling in was with housing, but to have the area covered with warehousing and distribution buildings is unacceptable degradation of the rural environment of the rural village of Westerleigh. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Robert Cole |
| **Comment ID** | 11480641/910 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Other: J18A:<br><br>The title of the Plan includes "strategy for development" yet it does not include a significant strategic development which the Council have already voted for – the new Junction 18A on the M4.<br><br>It is inconceivable that the Council can have a Strategic Plan which does not make allowance for, and demonstrate the support for, such a significant economic contribution. Thus the Local Planning activity becomes a farce. This has two major consequences which make the Local Plan almost a waste of time for the East of the area.<br><br>1. There is nothing in the Plan which shows how the new Junction will be exploited for the economic benefit of the area. There are no developments to show how the commercial and employment opportunities will be created; nor how any additional housing needed by the increased employment will be met.<br>2. There is nothing in the Plan to show how the infrastructure needed to support the new Junction, especially in terms of roads, will be provided. There is not even an outline to show that if the Junction goes ahead then certain areas and options need to be reserved to meet the needs of the infrastructure for the new Junction.<br><br>In particular, the link between the new Junction and Yate is essential to the economic development promised in the J18A proposal. If the Council goes ahead with the housing development at Coalpit Heath, and the employment area development to the West of Yate (both in the Joint Spatial Plan), then the options for building the 'Link Road to Yate' will be severely constrained. Any such Link Road must cross the South Wales Main Line to reach Yate from the proposed Junction sites. If the Council does not plan for this Link Road then it will be left with options to cross the Main Line which are too expensive to contemplate and thus the road will not be built. This will have two consequences:<br><br>1. The economic benefits that have been promised to offset the cost of the Junction cannot be realised – this will become a significant reason for the proposed Junction development to be refused by the Government.<br>2. If the junction is built all of the additional traffic generated between Yate and the new M4 Junction will pass through the village of Westerleigh. This route already has a weight restriction and is at capacity with the existing volume of traffic. This will have a severe impact on the village. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Howard Owen - Cleve RFC |
| **Comment ID** | 19732321/911 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Representations to the South Gloucestershire Local Plan: Consultation Document (February 2018).<br><br>Cleve Rugby Football Club, Cossham Street, Mangotsfield, BS16 9EN.<br><br>This letter has been prepared by JLL, on behalf of our Client, Cleve Rugby Football Club (referred to as Cleve RFC hereafter), in response to the South Gloucestershire Local Plan Consultation Document. This statement should be read in conjunction with the Call for Sites Submission which accompanies this Representation. Both Documents relate to the Cleve Rugby Football Club, Cossham Street, Mangotsfield, BS16 9EN (referred to as the subject site hereafter).<br><br>Cleve RFC is a community organisation which has been committed to promoting and developing Rugby Football over the last  years. This commitment has extended to continuously developing rugby football at junior and senior levels from  to  years of age, with the aim of progression and sustaining future senior rugby for all.<br><br>The Club would very much like to maintain this offering at its current community location and perpetuate its Rugby Mission Statement, however, commercial pressures have meant that the Club is no longer generating profit, and many of the facilities are in need of upgrading and maintenance works. As such, sale of part of the site for residential development to generate funds to enable the works would be the only way to sustain the club's future.<br><br>The land has previously been promoted to the Council at an earlier stage of Consultation (previous Reference SGJSPIO026). For the purposes of this Representation, the land being promoted for development lies to the South of the site running the length of the Cleve ground, and is separated from the remainder of the playing pitches by a section of trees acting as a natural buffer between the land proposed for sale and the remaining pitches (see Appendix 1). The site is circa 3.64 ha in size. Using a standard residential density of 25dph, the site could have capacity to support circa 90 dwellings. This site would therefore be considered as 'Non-Strategic Development,' as it falls below the 500 dwelling strategic threshold as defined within the Consultation Document. |

| | |
|---|---|
| | We are aware of Representations being submitted by Turley on behalf of Taylor Wimpey on land adjacent to Cleve RFC – we endorse those Representations and consider that the combined allocation (circa 300 units) of the Cleve RFC and Taylor Wimpey land is entirely logical. Equally, the Cleve RFC land can be facilitated independently.<br><br>This Representation is therefore structured to address the Consultation questions relating to Non-Strategic Growth as set out within the Consultation Document. |
| **Attached documents** | Cleve RFC (Howard Owen) - JLL (Kevin Hunt).pdf (390 KB) |

| | |
|---|---|
| **Respondent Name** | Marcus Whawell |
| **Comment ID** | 19992097/933 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Other<br><br>(Relation to Sustainability and Suitability of Charfield):<br><br>**Your Comments: See below:**<br><br>## Summary:<br><br>In relation to Charfield this Response Document will show that the LOCAL PLAN fails to plan for sustainable development in our village. It will show that the LOCAL PLAN fails to plan an adequate Transport Strategy; that it fails to take account of environmental issues; that it fails to deal with traffic issues; that it fails to plan for a supporting infrastructure; that it fails to take into account employment issues; and that, despite making unfounded statements to the contrary, **it does not** deliver a Plan for sustainable growth.<br><br>Furthermore, by not aligning itself with the National Planning Policy Framework, it may be in breach of Section 19(2)(a) of the Planning and Compulsory Purchase Act 2004 which requires any Local Plan, to have regard to national Policies and advice contained in guidance issued by the Secretary of State (the NPPF). I am raising this point as an additional argument against adoption of the LOCAL PLAN.<br><br>## Transport:<br><br>The LOCAL PLAN is reliant on the Joint Transport Study (JTS), but this will not be published until after the LOCAL PLAN Consultation has closed. The JTS outcomes need to be known before the LOCAL PLAN can be considered for acceptability.<br><br>Three of the four Unitary Authorities have stated that development will not take place until after transport infrastructure has been improved. South Gloucestershire have only stated that "developments will provide or contribute to a Transport Package." This is no Plan, nor even a commitment. It is also out of line with the other three Authorities and shows that South Gloucestershire have not done the required research to formulate an achievable Plan.<br><br>The LOCAL PLAN states that re-opening the Railway Station at Charfield will provide a sustainable transport solution. However, South Gloucestershire Council's own figures estimate that it would take a mere 2% of the 'to & from work travel' off the roads. The Gloucestershire Rail Study Report of May 2015 states that, in relation to re-opening Charfield Station, "*FGW do not see commercial potential for these stations and it is not surprising that the modelling results show relatively low levels of patronage.*" It goes on to state that there are "*track capacity issues which would put this proposal into the long-term.*" It is evident that the LOCAL PLAN's reliance on the re-opening of Charfield Station to solve the transport issues is fundamentally flawed.<br><br>Aside from the aspiration to re-open Charfield Station, there is no other commitment in the LOCAL PLAN to address the significant increase in traffic in this rural area, far from employment and commercial hubs.<br><br>Although Charfield has minimal bus services (hourly from Yate to Wotton, and from Thornbury to Dursley, and once per day to Bristol) most of the residents are car dependent for Commuting and Retail access.<br><br>It should be evident that Charfield can only be a commuter village, and one that has poor transport infrastructure, with limited scope for improvement. The LOCAL PLAN's dream to turn Charfield into a sustainable Strategic Development Location is simply not deliverable.<br><br>## Traffic: |

Charfield is built along the B4058, just South of the Gloucestershire town of Wotton-Under Edge. Commuter traffic from this town and neighbouring settlements has to pass through Charfield and thence onto the B4509 before it can access the M5 Motorway at Junction 14. Neither of these B Roads are built for large volumes of traffic, and the road through Charfield is not able to be widened due to houses on both sides and a narrow hump-back bridge over the railway. The Local Plan talks about Wotton Road improvements, but no one is able to elaborate, which tends to indicate that this will only be considered if the Local Plan is passed.

The Motorway Junction 14 has already been identified as overloaded and not fit for purpose by Highways England. This is the main commuter Junction not only for Charfield and beyond, but also for the Thornbury area, which is also earmarked in the LOCAL PLAN for significant housing development (around 3,500 houses).

The Planning Policy does not encourage people to minimise their journey lengths for employment, shopping, leisure, education and other activities. By situating this development on the edge of the County boundary far from Bristol, it will maximise, rather than minimise the journey times and associated congestion. Charfield is as far from the major retail and employment hubs as it is possible to get within the County.

The NPPF states (Paragraph 36) “All developments which generate significant amounts of movement should be required to provide a Travel Plan” – There is no Travel Plan. The LOCAL PLAN is reliant on the Joint Transport Study, but this will not be published until after the LOCAL PLAN Consultation has closed.

The development at Charfield has not been sited to accommodate the efficient delivery of goods and supplies, as the main route from the Motorway comprises two B Roads (B4509 and B4058).

## Infrastructure:

Unlike the other Councils in the West of England Combined Authority, South Glos have made no commitment to improving transport infrastructure – the aspiration is that the developers will contribute to a package that may include opening the station, improving the roads or investing in Junction 14 of the M5. In this regard, South Gloucestershire are out of line with the other Authorities in the WofE. Bristol, North Somerset and BANES Councils have all committed to complete the infrastructure first!

Charfield has one Primary School, currently at capacity, and no Secondary School/College. Today, Secondary School children from Charfield attend Katherine Lady Berkeley in neighbouring Wotton in Gloucestershire, or Thornbury. New Primary and Secondary Schools would need to be constructed to accommodate the potential additional 1,000 School places required to avoid further burdening Schools in neighbouring communities and the transport infrastructure to commute the pupils to those Schools.

There is no mention in the LOCAL PLAN for supporting the provision of high-speed Broadband. This is essential if homeworking is to cut down on the amount of commuting.

Wessex Water have raised concerns over the sewer network with an extra 1,000 houses in Charfield, yet no foul water and sewerage capacity modelling had been undertaken by November 2017.

Wotton-Under-Edge is already struggling with road capacity, parking and overstretched Healthcare resources. Without full provision for this infrastructure in Charfield, the doubling of the population of Charfield will further burden our Stroud District neighbours.

Charfield has no Health Care facilities; no Doctor’s Surgery, Dentist, Social Care Centre or Aged Care Homes. Villagers rely almost entirely on Wotton in neighbouring Stroud District or, to a lesser extent Yate or Thornbury, to provide these services. Again, chiefly accessed by car. The LOCAL PLAN does not plan to provide local health care facilities, instead relying on neighbouring Authorities to take up the load, without having consulted them. In failing to plan for the health care infrastructure that will be required by the increase in population, the inadequacies and complexities around current provision of community health services in areas around the boundaries of Local Authorities, particularly in rural areas which are often remote from existing services, are being exacerbated so that access can be a problem, as is currently the case in Charfield. The complications related to joint/partnership working with the LA or joint provision of services with Social Services will only be made worse, particularly in cases where a resident of one Local Authority area is registered with a GP from a Clinical Commission Group based mainly in an adjoining LA area. This can only get much worse where there is an increase in population if this is not appropriately addressed, and all this is in the broader context of Government proposals for more collaboration between health and social care.

## Environment:

There is no commitment to reducing pollution. Instead, by choosing Charfield as a major site, the Council have chosen to maximise the commuting distance to the major employment hub, Bristol, thereby maximising traffic pollution. Charfield is about as far from Bristol as it is possible to get within the County.

There is no mention in the LOCAL PLAN for the creation, protection, enhancement and management of networks of Biodiversity and green infrastructure.

The LOCAL PLAN does not identify and map components of the local ecological networks, including designated sites of importance for Biodiversity, Wildlife Corridors and stepping stones that connect them and any areas identified by local partnerships for habitat restoration or creation.

There is no mention in the LOCAL PLAN of a Strategic Flood Risk Assessment – Which is a requirement of Section 100 of the NPPF.

Section 17 of the NPPF says there needs to be a reduction in Greenhouse Gas pollution but there is no mention in the LOCAL PLAN for solutions which support reduced emissions/congestion. Instead emissions/congestion will be increased by the likely doubling of private vehicle use in order to commute to a place of work.

An adverse consequence of the already congested B4058 through Charfield is poor air quality from pollution, causing many local people severe chest & respiratory problems. GP's in Wotton-Under-Edge, who see most of the Charfield residents, have noted a greater than expected increase in patients from Charfield requiring long term respiratory medications. This problem has been increasing over several years as the traffic levels have also increased. The local Council has now requested an Air Quality Examination by the Environment Agency and a local GP has stated that he is willing to give medical evidence to support reducing the pollution levels. This issue has profound implications for both quality of life for many villagers and health care facilities and funding.

The National Planning Policy Framework (NPPF) published in March 2012 (Paragraph 112) states:

1. *Local Planning Authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, Local Planning Authorities should seek to use areas of poorer quality land in preference to that of a higher quality.*

*The best and most versatile land is defined as Grades 1, 2 and 3a by Policy guidance (see Annex 2 of NPPF).*

The diagram below clearly identifies 4 major sites of Best and Most Versatile Land 3a that will be lost forever if the LOCAL PLAN allows this land to be used for housing, employment and roads. This means the LOCAL PLAN is prepared to ignore the NPPF and build on Best and Most Versatile Land even when other sites with very poor quality land are available throughout the West of England Combined Authority – many of which are far closer to the urban areas where housing is needed.

Please see the attached Document for the Diagram which is referenced above.

Source Documents:

http://publications.naturalengland.org.uk/file/5732147682869248

http://publications.naturalengland.org.uk/file/4424325

## Employment:

Although there are sites allocated to business use, it is unlikely that business suited to the skill set of residents of the village will locate here. It is more likely that this land becomes warehousing which has low employment needs, or as has recently been the case nearby in Thornbury, land which was initially set aside for employment use has been given over to more housing.

Charfield has virtually no business or industry to provide additional employment in the area. The largest business in the locale is Renishaw in neighbouring Gloucestershire to the North, but this would provide for a handful of jobs, at best, and those would be specialist in nature. Yet the Plan seems to rely upon them employing many of the new residents.

## Sustainability:

The LOCAL PLAN claims that Charfield will become a more sustainable settlement, but there are no actual plans laid out for how this will happen. The LOCAL PLAN is only paying lip service to the phrase and does not play an active role in guiding development to sustainable solutions.

The LOCAL PLAN, as far as it concerns Charfield, is only concerned with building houses and does not set out Strategic Priorities for transport, communications infrastructure, sustainability, health or the environment. This is in direct conflict with the requirement for Plan making as described in the National Planning Policy Framework.

Even though Charfield is in a rural area, the Council has not co-operated with neighbouring Gloucestershire Authorities, and the Local Planning Authorities have not been responsive to local circumstances and planned housing development to reflect local needs.

There is no mention in the LOCAL PLAN of setting out a Housing Implementation Strategy and describing how they will maintain delivery of a five-year supply of housing land to meet their housing target.

The only Key Partners that the Planners worked with were Land Owners and Developers who stood to make a fortune from the Plan. There is zero effective co-operation with residents.

There is no need for more housing in this area. Housing demand should be met closest to where it is needed.

During the JSP 15/16 processes the Local Authorities requested that landowners offer up land that could be used for housing development, as part of the Call for Sites. It has become clear in the 2018 Local Plan that the Strategic Development Locations have been chosen where the land has been offered from one landowner thus making the Administration easier for the Council, rather than choosing locations based upon their suitability or where housing is needed.

As you will see from the before and after Map below, before the Call for Sites, Charfield was (and is) a small rural village served only by small B Roads, yet if Charfield is to be branded as a Strategic Development Location, it will be more than twice the size it is now, with no commitments to any infrastructure, health services or transport solutions.

Please see the attached Document for the Map which is referenced above.

## Reference to Previous Versions of the LOCAL PLAN:

In comparing the 2017 Plan with the 2015 and 2016 versions it can be seen that Charfield was not, at that time, considered a Strategic Location, but a settlement suited to smaller development (less than 500 homes). The 2015 JSP describes Charfield as "*Travel options are limited, although local congestion is, in many cases, less severe than the more urban locations. There are generally limited opportunities to limit car dependency for new developments in these locations. Generally small-scale development would take place with relatively modest packages of transport improvements, but in most cases car use would remain high.*"

There is no explanation given for the change from Charfield being a "*smaller development*" of under 500 houses in the 2015 Plan, to being an "*other town expansion*" of up to 1,000 houses in the 2016 Plan, to a Strategic Location for 1,200 houses in the 2017 Plan. This is not a Strategic Plan, this is the Council looking for an easy way to mass-build houses "under the radar" and with little regard to the needs of the existing residents.

The LOCAL PLAN goes against its own stated Strategic Priorities of "*Infrastructure: To ensure a Spatial Strategy where new development is properly aligned with infrastructure*" and the associated Spatial Implication that "*Strategic development should be in locations which maximise the potential to reduce the need to travel or, where travel is necessary, maximise opportunities to travel by sustainable, non-car modes, especially walking and cycling or be in places accessible to existing or new high quality Public Transport links. The focus of new transport infrastructure should address both existing challenges and create capacity for sustainable growth,*" having already stated that Charfield is in a location where travel options are limited and car use would remain high.

The 2015 JSP Consulted on the basis of small-scale development and the local response was to concentrate on transport and protect green space. There was no mention at that time of new development areas. The results from this Consultation were then misused to justify Charfield as a Strategic Development Area. South Gloucestershire Council seem to only Consult in order to say they have done so. They consistently ignore the results and go directly against the wishes of those they have Consulted.

## Conclusion:

The LOCAL PLAN should not be accepted, on the grounds laid out in this Response. The Local Authority should be asked to look again at their aims for providing sustainable development in the area, and should be asked to focus on a Plan that provides housing that meets the requirements of reducing the traffic burden, rather than increasing it; a Plan that provides for proportionate growth, not overwhelming development; a Plan that includes the necessary infrastructure of education, health and social welfare; a Plan that is actually sustainable, not just claiming that it is.

In the recent Autumn Budget Statement, the Chancellor of the Exchequer stated "*We will focus on the urban areas where people want to live and where most jobs are created. Making best use of our urban land, and continuing the strong protection of our Green Belt. In particular, building high quality, high density homes in city centres and around transport hubs*" (Hansard Column 1058).

In planning to increase unsustainable house building in Charfield the LOCAL PLAN presents itself contrary to its own Mission Statement (to be consistent with national Policy) and sets itself directly against Central Government Policy and aspirations.

| | |
|---|---|
| **Attached documents** | Mr. Marcus Whawell.pdf (519 KB) |

| | |
|---|---|
| **Respondent Name** | Peter Barker - Latteridge Road Community Group |
| **Comment ID** | 6622945/936 |

| | |
|---|---|
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **(a) Engagement with Local Councils:**<br><br>Before the next stage of producing the new Local Plan South Gloucestershire should tap into local knowledge in Iron Acton about the significance locally of particular sites and areas, their sustainability, land ownership, historic or ecological value etc. This should be a genuine reaching-out to local people rather than simply general "drop-in" events. This would be consistent with the spirit of the South Gloucestershire Statement of Community Involvement and alert the Authority to issues of particular local sensitivity or concern.<br><br>**(b) M4 Junction 18A:**<br><br>The decision in March 2018 by South Gloucestershire Cabinet Members to recommend the Lyde Green option for the new Junction 18A on the M4 following the public Consultation in 2017 means that Highways England is now in a position to make a firm recommendation to the Department for Transport on its location. The new Junction should include a link to Yate. It would change significantly the relative sustainability of different locations in the Yate/Chipping Sodbury area. This should be taken into account in the new Local Plan and in the Joint Spatial Plan. Failure to do so will undermine both Plans and render them unsound.<br><br>**(c) General Approach Proposed for the Local Plan:**<br><br>I agree that the starting point should be the completion of existing, agreed Core Strategy developments in South Gloucestershire, and that priority should be given to urban renewal and maximising the use of Brownfield land in Yate/Chipping Sodbury in order to minimise loss of Greenfield land. This would include proceeding with the North Yate New Neighbourhood which would provide up to 3,000 new homes for Yate.<br><br>Although it is 12 years since the North Yate New Neighbourhood was agreed nothing has been built. This means that there is no justification for the further proposal for 2,000 homes in the neighbouring North West Yate location. North West Yate should not proceed in the absence of clear evidence that there is a demand for another 4,000 homes in the Yate, Chipping Sodbury and Coalpit Heath area. Over-supply of development sites will simply encourage developers to cherry-pick the easiest ones resulting in a piecemeal approach rather than the "master-planning" South Gloucestershire says it wants.<br><br>I also object strongly to siting the proposed North West Yate development in the Iron Acton Green Belt without demonstrating the "exceptional circumstances" required by National Guidance. No justification is given in the Draft Joint Spatial Plan and it appears that no justification will be given in the new Local Plan. So how will the national requirements be demonstrated? South Gloucestershire should rethink. If it has to identify sites for major new development additional to North Yate they should be in areas close to the new M4 Junction 18A, rather than in Iron Acton (which is separated from it by a railway line, the River Frome and unspoilt Green Belt). Moreover, the huge HGV menace of landlocked HGVs careering down unsuitable B Roads, where 2 HGVs passing physically don't fit in some places has been an unresolved issue for over 35 years when a planned Bypass linking to the Motorway system was abandoned. NOW is the time for that new essential infrastructure to solve the inevitable traffic congestion.<br><br>**(d) Design of New Development:**<br><br>I welcome South Gloucestershire's commitment to a "master-planning" approach to strategic developments "in Consultation with local and community interests" and to setting out clearly exactly where it proposes new development should occur. But in villages and other non-urban settlements the design of smaller, non-strategic developments is just as important. This includes paying close attention to the shape, scale and appearance of development to ensure it sits harmoniously within its context. Historic England has pointed out that from Roman times buildings in the West of England have used local stone and other materials giving a characteristic look and feel to our historic settlements. In Iron Acton local pennant stone was the most commonly used material along with oak structural timbers. Even the name, Iron Acton, means village of oak. This "local vernacular" should be reflected in the design of any new developments, large or small, in Iron Acton Parish.<br><br>I do not agree that the proposed North West Yate development, if it goes ahead, should have a "modernist" feel to match the post 1960's housing in Yate. Even though it is referred to as North West Yate it would be effectively a separate neighbourhood in Iron Acton separated from Yate by the industrial areas East of the Yate Road/Armstrong Way roundabout. If it is to go ahead despite the overwhelming opposition of local people it should at least be designed with reference to local historic building traditions so that the existing beautiful pennant stone buildings and walls in the area are not overwhelmed and turned into historical anomalies by a "modernist" aesthetic.<br><br>I share South Gloucestershire's view that no development should be begun without pre-delivery of essential infrastructure. In Iron Acton Parish that would include increasing transport capacity to avoid worsening the existing congestion and lorry blight on the B4058 Wotton/Bristol Road, and B4059 Yate/Latteridge Road. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Peter Barker - Latteridge Road Community Group |
| **Comment ID** | 6622945/937 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | SDL - Yate:<br><br>**Urban Localities – Yate:** |

| | |
|---|---|
| | I welcome the proposed "whole town" approach to future planning for Yate but do not support the inclusion of the proposed North West Yate Strategic Development Location in this. In the absence of credible evidence that the Yate/Chipping Sodbury/Coalpit Heath area needs the proposed 50% increase in housing stock (over 20 years, meaning an unprecedented 2.5% average annual population increase), and in the absence of credible evidence that building in the Green Belt is justified and the most sustainable option, the North West Yate proposal should not proceed.<br><br>I support the suggested "Western Gateway" around Yate Railway Station and the aim of more intensive and mixed use of the employment areas within the Parish (in particular the Industrial Estates East of the Yate/Armstrong Road Roundabout). As part of this steps should be taken to reduce the impact of heavy goods traffic on homes on the B4058 Wotton/Bristol Road and the B4059 Yate/Latteridge Road, principally by supporting proposals for the new M4 Junction 18A and encouraging Heavy Goods Vehicles to use that route. You may recall that a new road was proposed 35 years ago to ameliorate this problem; but it was subsequently rejected for lack of funds. Clearly NOW is the time to re-examine this major infrastructure requirement iwithout which the additional traffic from tens of thousands of new homes across S Glos will inevitably cause misery and grid-lock. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kate Edmonds |
| **Comment ID** | 19883393/947 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **(a) Engagement with Local Councils:**<br><br>Before the next stage of producing the new Local Plan South Gloucestershire should tap into local knowledge in Iron Acton about the significance locally of particular sites and areas, their sustainability, land ownership, historic or ecological value etc. This should be a genuine reaching-out to local people rather than simply general "drop-in" events. This would be consistent with the spirit of the South Gloucestershire Statement of Community Involvement and alert the Authority to issues of particular local sensitivity or concern.<br><br>**(b) M4 Junction 18A:**<br><br>The decision in March 2018 by South Gloucestershire Cabinet Members to recommend the Lyde Green option for the new Junction 18A on the M4 following the public Consultation in 2017 means that Highways England is now in a position to make a firm recommendation to the Department for Transport on its location. The new Junction should include a link to Yate. It would change significantly the relative sustainability of different locations in the Yate/Chipping Sodbury area. This should be taken into account in the new Local Plan and in the Joint Spatial Plan. Failure to do so will undermine both Plans and render them unsound.<br><br>**(c) General Approach Proposed for the Local Plan:**<br><br>I agree that the starting point should be the completion of existing, agreed Core Strategy developments in South Gloucestershire, and that priority should be given to urban renewal and maximising the use of Brownfield land in Yate/Chipping Sodbury in order to minimise loss of Greenfield land. This would include proceeding with the North Yate New Neighbourhood which would provide up to 3,000 new homes for Yate.<br><br>Although it is 12 years since the North Yate New Neighbourhood was agreed nothing has been built. This means that there is no justification for the further proposal for 2,000 homes in the neighbouring North West Yate location. North West Yate should not proceed in the absence of clear evidence that there is a demand for another 4,000 homes in the Yate, Chipping Sodbury and Coalpit Heath area. Over-supply of development sites will simply encourage developers to cherry-pick the easiest ones resulting in a piecemeal approach rather than the "master-planning" South Gloucestershire says it wants.<br><br>I also object strongly to siting the proposed North West Yate development in the Iron Acton Green Belt without demonstrating the "exceptional circumstances" required by National Guidance. No justification is given in the Draft Joint Spatial Plan and it appears that no justification will be given in the new Local Plan. So how will the national requirements be demonstrated? South Gloucestershire should rethink. If it has to identify sites for major new development additional to North Yate they should be in areas close to the new M4 Junction 18A, rather than in Iron Acton (which is separated from it by a railway line, the River Frome and unspoilt Green Belt).<br><br>I understand specifically for example that Planning Permission was recently Refused for an (unobtrusive) car wash at the site of Poplar's Farm, between Frampton Cotterell and Iron Acton on the Bristol Road, on the basis that the land is Green Belt. I do not understand why that would be considered inappropriate development but the building of a significant number of houses and other buildings on nearby Green Belt is being proposed.<br><br>**(d) Design of New Development:**<br><br>I welcome South Gloucestershire's commitment to a "master-planning" approach to strategic developments "in Consultation with local and community interests" and to setting out clearly exactly where it proposes new development should occur. But in villages and other non-urban settlements the design of smaller, non-strategic developments is just as important. This includes paying close attention to the shape, scale and appearance of development to ensure it sits harmoniously within its context. Historic England has pointed out that from Roman times buildings in the West of England have used local stone and other materials giving a characteristic look and feel to our historic settlements. In Iron Acton local pennant stone was the most commonly used material along with oak structural timbers. Even the name, Iron Acton, means village of oak. This "local vernacular" should be reflected in the design of any new developments, large or small, in Iron Acton Parish. |

| | |
|---|---|
| | I do not agree that the proposed North West Yate development, if it goes ahead, should have a “modernist” feel to match the post 1960's housing in Yate. Even though it is referred to as North West Yate it would be effectively a separate neighbourhood in Iron Acton separated from Yate by the industrial areas East of the Yate Road/Armstrong Way roundabout. If it is to go ahead despite the overwhelming opposition of local people it should at least be designed with reference to local historic building traditions so that the existing beautiful pennant stone buildings and walls in the area are not overwhelmed and turned into historical anomalies by a ”modernist” aesthetic.<br><br>I share South Gloucestershire’s view that no development should be begun without pre-delivery of essential infrastructure. In Iron Acton Parish that would include increasing transport capacity to avoid worsening the existing congestion and lorry blight on the B4058 Wotton/Bristol Road, and B4059 Yate/Latteridge Road.<br><br>This should include a review of Public Transport in the area (noting in particular that the buses which travel down Bristol Road between Yate and Bristol also travel through Iron Acton village, which does not have suitable roads for increased buses, but yet there would need to be increased Public Transport available should these houses be built). |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kate Edmonds |
| **Comment ID** | 19883393/948 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | SDL - Yate:<br><br>**Urban Localities – Yate:**<br><br>I welcome the proposed “whole town” approach to future planning for Yate but do not support the inclusion of the proposed North West Yate Strategic Development Location in this. In the absence of credible evidence that the Yate/Chipping Sodbury/Coalpit Heath area needs the proposed 50% increase in housing stock (over 20 years, meaning an unprecedented 2.5% average annual population increase), and in the absence of credible evidence that building in the Green Belt is justified and the most sustainable option, the North West Yate proposal should not proceed.<br><br>I support the suggested “Western Gateway” around Yate Railway Station and the aim of more intensive and mixed use of the employment areas within the Parish (in particular the Industrial Estates East of the Yate/Armstrong Road Roundabout). As part of this steps should be taken to reduce the impact of heavy goods traffic on homes on the B4058 Wotton/Bristol Road and the B4059 Yate/Latteridge Road, principally by supporting proposals for the new M4 Junction 18A and encouraging Heavy Goods Vehicles to use that route. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David and Tracey Jones |
| **Comment ID** | 19883585/967 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **(a) Engagement with Local Councils:**<br><br>Before the next stage of producing the new Local Plan South Gloucestershire should tap into local knowledge in Iron Acton and Nibley about the significance locally of particular sites and areas, their sustainability, land ownership, historic or ecological value etc. This should be a genuine reaching-out to local people rather than simply general “drop-in” events and it will provide an opportunity for engagement and discussions with those people who are directly impacted by the proposals. This would be consistent with the spirit of the South Gloucestershire Statement of Community Involvement and alert the Authority to issues of particular local sensitivity or concern.<br><br>**(b) M4 Junction 18A:**<br><br>The decision in March 2018 by South Gloucestershire Cabinet Members to recommend the Lyde Green option for the new Junction 18A on the M4 following the public Consultation in 2017 means that Highways England is now in a position to make a firm recommendation to the Department for Transport on its location. The new Junction should include a link to Yate. It would change significantly the relative sustainability of different locations in the Yate/Chipping Sodbury area. This should be taken into account in the new Local Plan and in the Joint Spatial Plan. Failure to do so will undermine both Plans and render them unsound. The timing of the development is also critical to ensure that the highway developments take place ahead of the residential/commercial development.<br><br>**(c) General Approach Proposed for the Local Plan:**<br><br>I agree that the starting point should be the completion of existing, agreed Core Strategy developments in South Gloucestershire, and that priority should be given to urban renewal and maximising the use of Brownfield land in Yate/Chipping Sodbury in order to minimise loss of Greenfield land. This would include proceeding with the North Yate New Neighbourhood which would provide up to 3,000 new homes for Yate.<br><br>Although it is 12 years since the North Yate New Neighbourhood was agreed nothing has been built. This means that there is no justification for the further proposal for 2,000 homes in the neighbouring North West Yate location. North West Yate should not proceed in the absence of clear |

| | |
|---|---|
| | evidence that there is a demand for another 4,000 homes in the Yate, Chipping Sodbury and Coalpit Heath area. Over-supply of development sites will simply encourage developers to cherry-pick the easiest ones resulting in a piecemeal approach rather than the "master-planning" South Gloucestershire says it wants.<br><br>I also object strongly to siting the proposed North West Yate development in the Iron Acton and Nibley Green Belt without demonstrating the "exceptional circumstances" required by National Guidance. No justification is given in the Draft Joint Spatial Plan and it appears that no justification will be given in the new Local Plan. So how will the national requirements be demonstrated? South Gloucestershire should rethink. If it has to identify sites for major new development additional to North Yate they should be in areas close to the new M4 Junction 18A, rather than in Iron Acton/Nibley (which is separated from it by a railway line, the River Frome and unspoilt Green Belt).<br><br>**(d) Design of New Development:**<br><br>I welcome South Gloucestershire's commitment to a "master-planning" approach to strategic developments "in Consultation with local and community interests" and to setting out clearly exactly where it proposes new development should occur. But in villages and other non-urban settlements the design of smaller, non-strategic developments is just as important. This includes paying close attention to the shape, scale and appearance of development to ensure it sits harmoniously within its context. Historic England has pointed out that from Roman times buildings in the West of England have used local stone and other materials giving a characteristic look and feel to our historic settlements. In Iron Acton local pennant stone was the most commonly used material along with oak structural timbers. Even the name, Iron Acton, means village of oak. This "local vernacular" should be reflected in the design of any new developments, large or small, in Iron Acton Parish.<br><br>I do not agree that the proposed North West Yate development, if it goes ahead, should have a "modernist" feel to match the post 1960's housing in Yate. Even though it is referred to as North West Yate it would be effectively a separate neighbourhood in Iron Acton separated from Yate by the industrial areas East of the Yate Road/Armstrong Way roundabout. If it is to go ahead despite the overwhelming opposition of local people it should at least be designed with reference to local historic building traditions so that the existing beautiful pennant stone buildings and walls in the area are not overwhelmed and turned into historical anomalies by a "modernist" aesthetic.<br><br>I share South Gloucestershire's view that no development should be begun without pre-delivery of essential infrastructure. In Iron Acton Parish that would include increasing transport capacity to avoid worsening the existing congestion and lorry blight on the B4058 Wotton/Bristol Road, and B4059 Yate/Latteridge Road. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David and Tracey Jones |
| **Comment ID** | 19883585/968 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | SDL - Yate:<br><br>**Urban Localities – Yate:**<br><br>I welcome the proposed "whole town" approach to future planning for Yate but do not support the inclusion of the proposed North West Yate Strategic Development Location in this. In the absence of credible evidence that the Yate/Chipping Sodbury/Coalpit Heath area needs the proposed 50% increase in housing stock (over 20 years, meaning an unprecedented 2.5% average annual population increase), and in the absence of credible evidence that building in the Green Belt is justified and the most sustainable option, the North West Yate proposal should not proceed.<br><br>I support the suggested "Western Gateway" around Yate Railway Station and the aim of more intensive and mixed use of the employment areas within the Parish (in particular the Industrial Estates East of the Yate/Armstrong Road Roundabout). As part of this steps should be taken to reduce the impact of heavy goods traffic on homes on the B4058 Wotton/Bristol Road, the B4059 Yate/Latteridge Road and the A432 Badminton Road, principally by supporting proposals for the new M4 Junction 18A and encouraging Heavy Goods Vehicles to use that route. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ben Stutman - Buckinghamshire County Council |
| **Comment ID** | 19778817/986 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sir/Madam,<br><br>Thank you for the opportunity to review and respond to the South Gloucestershire Local Plan Consultation. Buckinghamshire County Council has no Comments.<br><br>If you have any questions please let me know. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Charles Morgan |
| **Comment ID** | 7920161/989 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sirs,<br><br>I am writing to express my profound disappointment in the South Gloucestershire Local Plan Consultation Document.<br><br>First of all, it seems that the Council is attempting to put the cart before the horse by bringing forward this Document before the Joint Spatial Plan for the West of England has been given its Examination in Public. It would appear that the Council is prejudging the conclusions of that process and preparing the ground to rush to approval of some developments before either the JSP or the Local Plan have been adopted.<br><br>The New Local Plan Consultation goes to great lengths to recognise many of the problems that are already faced by South Gloucestershire residents, such as extreme traffic congestion and pollution (caused by high levels of commuting by private vehicles in the absence of adequate Public Transport) and historic failures of infrastructure to keep pace with development. However, it does not provide any solution to these existing problems, let alone any explanation of how the addition of a further 32,500 homes in South Gloucestershire is going to help to alleviate these problems.<br><br>In any case, there are serious questions about whether South Gloucestershire genuinely needs to build this number of homes before 2036 to meet forecast demand. Why is it that South Gloucestershire has accepted the highest proportion of new building of the four Authorities in the JSP for the West of England (potentially a remarkable 35% excess build over forecast need)? The Council needs to provide an explanation why it is prepared to sacrifice Greenfield sites to development and to admit that this is not justified by forecast demand.<br><br>Similarly, the Council needs to explain why it is the only one of the four Authorities which does not specify which transport infrastructure projects are a prerequisite for the specified Strategic Development Locations to go ahead. In the course of the last week there have been suggestions that plans for the MetroBus extension Northwards to Thornbury (and Buckover, if it is ever built) have been shelved. In that case, what transport and infrastructure developments are the Council proposing to provide before new developments are allowed and how are they going to be funded?<br><br>The New Local Plan Consultation Document, despite its length, is short of the detail required by local people to be reassured that this will remain a decent place to live and that the Council are acting in the best interests of existing residents. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ann Weaver |
| **Comment ID** | 19808897/1001 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Council Members,<br><br>I do not think a new Junction in any location is the answer to the traffic problems in the local area. The Lyde Green option may be the choice of Pucklechurch residents, but would increase traffic in other areas, including Emersons Green and parts of Downend. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hannah Spanton - Badminton Estate |
| **Comment ID** | 19884225/1027 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Question 3:<br><br>The South Gloucestershire Core Strategy 2006 - 2027 focussed development on large Strategic Sites predominantly around the edges of Bristol, as these were interpreted as the most sustainable.<br><br>To a large extent, it ignored the development of rural communities, which makes up over 20% of the Districts' population (Draft Local Plan, 1.17). The current NPPF is clear at Paragraph 28 that Planning Policies should take a positive approach to sustainable development. This includes promoting the retention and development of local services and community facilities in villages. Within Rural Areas, Paragraph 55 is supportive of housing where it will enhance or maintain the viability of rural communities.<br><br>The Housing White Paper (February 2017), with regard to thriving rural communities, set out that it expects Local Planning Authorities to identify opportunities for villages to thrive especially where this would support services and help meet the need to provide homes for local people who currently find it hard to live where they grew up. The Draft NPPF (March 2018) which is due to be adopted in Summer 2018 now states in Paragraph 80 that: |

| | |
|---|---|
| | *"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Plans should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support the services in a village nearby."*<br><br>It is pleasing to see that one of the key aims of the new South Gloucestershire Local Plan is to support small scale development which meets the needs of rural communities (Page 4).<br><br>A number of key issues have been set out within the Consultation Local Plan which are considered relevant to this Representation:<br><br>• The need for a wider range of housing types and sizes to cater for all sections of the community;<br>• Significant issues of affordability;<br>• Issues of accessibility from some area which exacerbates inequality across our communities.<br><br>The approach to new development which is made up of 4 elements (completion of strategic developments, maximise Brownfield land in urban areas, Strategic Development Locations and smaller scale development in rural areas) is welcomed. It is however considered that for rural areas, the need for an additional 1,300 new homes should be a minimum figure, especially as the Draft NPPF (Paragraph 69) acknowledges the importance of smaller sites, which are likely to be found in rural areas. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Andrew Gregory |
| **Comment ID** | 14393153/1040 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sirs,<br><br>I agree with and fully endorse the Comments from Trapp'd and Falfield Parish Council which I fully agree should form part of the Response to your Consultation and I wish my name to be included alongside their Comments.<br><br>Please also see my Comments for inclusion in the Consultation below:-<br><br>I am extremely annoyed that the Local Plan has still not provided any Planning Constraints or Conditions to ensure that key infrastructure is delivered ahead of the housing. This is extremely disturbing given the fact that South Gloucestershire Council was the only one of the four parties to the JSP that omitted to include these in the JSP. The Council needs to explain why it is failing in its duty to protect existing residents from the potential of these large scale developments being built without appropriate Health and Safety Conditions being addressed.<br><br>There should be no further building outside the boundaries of the Strategic Development Locations and Green Belts should be set up around all the Strategic Development Locations. This will protect the existing settlements and allow for time to adjust to the existing settlement being swamped with housing. The Call for Sites must not include any further provision for areas that have been swamped by the Strategic Development Locations.<br><br>There must be adequate provision for existing residents not to be placed at a disadvantage to the new sites through the free connection to all mains services including gas and sewage.<br><br>The Local Plan must also consider what will happen in the event of the JSP failing Public Examination and these constraints will help ensure that the sites are protected from the fall out should the JSP fail or the infrastructure prove too difficult to deliver.<br><br>If the Council does not provide the required Planning Conditions or Policies then the Council Officers and Members should be held accountable for the failure to deliver adequate health and safety for the existing and new residents of these Strategic Development Sites as they failed to include these conditions in the JSP. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tracey Whawell |
| **Comment ID** | 20015521/1041 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Other:<br><br>(Relation to Sustainability and Suitability of Charfield): |

## Summary:

In relation to Charfield this Response Document will show that the LOCAL PLAN fails to plan for sustainable development in our village. It will show that the LOCAL PLAN fails to Plan an adequate Transport Strategy; that it fails to take account of environmental issues; that it fails to deal with traffic issues; that it fails to Plan for a supporting infrastructure; that it fails to take into account employment issues; and that, despite making unfounded statements to the contrary, **it does not** deliver a Plan for sustainable growth.

Furthermore, by not aligning itself with the National Planning Policy Framework, it may be in breach of Section 19(2)(a) of the Planning and Compulsory Purchase Act 2004 which requires any Local Plan, to have regard to national Policies and advice contained in guidance issued by the Secretary of State (the NPPF). I am raising this point as an additional argument against adoption of the LOCAL PLAN.

## Transport:

The LOCAL PLAN is reliant on the Joint Transport Study (JTS), but this will not be published until after the LOCAL PLAN Consultation has closed. The JTS outcomes need to be known before the LOCAL PLAN can be considered for acceptability.

Three of the four Unitary Authorities have stated that development will not take place until after transport infrastructure has been improved. South Gloucestershire have only stated that "developments will provide or contribute to a Transport Package." This is no Plan, nor even a commitment. It is also out of line with the other three Authorities and shows that South Gloucestershire have not done the required research to formulate an achievable Plan.

The LOCAL PLAN states that re-opening the railway station at Charfield will provide a sustainable transport solution. However, South Gloucestershire Council's own figures estimate that it would take a mere 2% of the 'to & from work travel' off the roads. The Gloucestershire Rail Study Report of May 2015 states that, in relation to re-opening Charfield Station, "*FGW do not see commercial potential for these stations and it is not surprising that the modelling results show relatively low levels of patronage.*" It goes on to state that there are "*track capacity issues which would put this proposal into the long-term.*" It is evident that the LOCAL PLAN's reliance on the re-opening of Charfield Station to solve the transport issues is fundamentally flawed.

Aside from the aspiration to re-open Charfield Station, there is no other commitment in the LOCAL PLAN to address the significant increase in traffic in this rural area, far from employment and commercial hubs.

Although Charfield has minimal bus services (hourly from Yate to Wotton, and from Thornbury to Dursley, and once per day to Bristol) most of the residents are car dependent for Commuting and Retail access.

It should be evident that Charfield can only be a commuter village, and one that has poor transport infrastructure, with limited scope for improvement. The LOCAL PLAN's dream to turn Charfield into a sustainable Strategic Development Location is simply not deliverable.

## Traffic:

Charfield is built along the B4058, just South of the Gloucestershire town of Wotton-Under Edge. Commuter traffic from this town and neighbouring settlements has to pass through Charfield and thence onto the B4509 before it can access the M5 Motorway at Junction 14. Neither of these B Roads are built for large volumes of traffic, and the road through Charfield is not able to be widened due to houses on both sides and a narrow hump-back bridge over the railway. The Local Plan talks about Wotton Road improvements, but no one is able to elaborate, which tends to indicate that this will only be considered if the Local Plan is passed.

The Motorway Junction 14 has already been identified as overloaded and not fit for purpose by Highways England. This is the main commuter Junction not only for Charfield and beyond, but also for the Thornbury area, which is also earmarked in the LOCAL PLAN for significant housing development (around 3,500 houses).

The Planning Policy encourages people to minimise their journey lengths for employment, shopping, leisure, education and other activities. By situating this development on the edge of the County boundary far from Bristol, it will maximise, rather than minimise the journey times and associated congestion. Charfield is as far from the major retail and employment hubs as it is possible to get within the County.

The NPPF states (Paragraph 36) "All developments which generate significant amounts of movement should be required to provide a Travel Plan" – There is no Travel Plan. The LOCAL PLAN is reliant on the Joint Transport Study, but this will not be published until after the LOCAL PLAN Consultation has closed.

The development at Charfield has not been sited to accommodate the efficient delivery of goods and supplies, as the main route from the Motorway comprises two B Roads (B4509 and B4058).

## Infrastructure:

Unlike the other Councils in the West of England Combined Authority, South Glos have made no commitment to improving transport infrastructure – the aspiration is that the developers will contribute to a package that may include opening the station, improving the roads or investing in Junction 14 of the M5. In this regard, South Gloucestershire are out of line with the other Authorities in the WofE. Bristol, North Somerset and BANES Councils have all committed to complete the infrastructure first!

Charfield has one Primary School, currently at capacity, and no Secondary School/College. Today, Secondary School children from Charfield attend Katherine Lady Berkeley in neighbouring Wotton in Gloucestershire, or Thornbury. New Primary and Secondary Schools would need to be constructed to accommodate the potential additional 1,000 School places required to avoid further burdening Schools in neighbouring communities and the transport infrastructure to commute the pupils to those Schools.

There is no mention in the LOCAL PLAN for supporting the provision of high-speed Broadband. This is essential if homeworking is to cut down on the amount of commuting.

Wessex Water have raised concerns over the Sewer Network with an extra 1,000 houses in Charfield, yet no foul water and sewerage capacity modelling had been undertaken by November 2017.

Wotton-Under-Edge is already struggling with road capacity, parking and overstretched Healthcare resources. Without full provision for this infrastructure in Charfield, the doubling of the population of Charfield will further burden our Stroud District neighbours.

Charfield has no Health Care facilities; no Doctor's Surgery, Dentist, Social Care centre or Aged Care Homes. Villagers rely almost entirely on Wotton in neighbouring Stroud District or, to a lesser extent Yate or Thornbury, to provide these services. Again, chiefly accessed by car. The LOCAL PLAN does not plan to provide local health care facilities, instead relying on neighbouring Authorities to take up the load, without having Consulted them. In failing to plan for the health care infrastructure that will be required by the increase in population, the inadequacies and complexities around current provision of community health services in areas around the boundaries of Local Authorities, particularly in rural areas which are often remote from existing services, are being exacerbated so that access can be a problem, as is currently the case in Charfield. The complications related to joint/partnership working with the LA or joint provision of services with Social Services will only be made worse, particularly in cases where a resident of one Local Authority area is registered with a GP from a Clinical Commission Group based mainly in an adjoining LA area. This can only get much worse where there is an increase in population if this is not appropriately addressed, and all this is in the broader context of Government proposals for more collaboration between health and social care.

## Environment:

There is no commitment to reducing pollution. Instead, by choosing Charfield as a major site, the Council have chosen to maximise the commuting distance to the major employment hub, Bristol, thereby maximising traffic pollution. Charfield is about as far from Bristol as it is possible to get within the County.

There is no mention in the LOCAL PLAN for the creation, protection, enhancement and management of networks of Biodiversity and green infrastructure.

The LOCAL PLAN does not identify and map components of the local Ecological Networks, including designated sites of importance for Biodiversity, Wildlife Corridors and stepping stones that connect them and any areas identified by local partnerships for habitat restoration or creation.

There is no mention in the LOCAL PLAN of a Strategic Flood Risk Assessment – Which is a requirement of Section 100 of the NPPF.

Section 17 of the NPPF says there needs to be a reduction in Greenhouse Gas pollution but there is no mention in the LOCAL PLAN for solutions which support reduced emissions/congestion. Instead emissions/congestion will be increased by the likely doubling of private vehicle use in order to commute to a place of work.

An adverse consequence of the already congested B4058 through Charfield is poor air quality from pollution, causing many local people severe chest & respiratory problems. GPs in Wotton-Under-Edge, who see most of the Charfield residents, have noted a greater than expected increase in patients from Charfield requiring long term respiratory medications. This problem has been increasing over several years as the traffic levels have also increased. The local Council has now requested an Air Quality Examination by the Environment Agency and a local GP has stated that he is willing to give medical evidence to support reducing the pollution levels. This issue has profound implications for both quality of life for many villagers and health care facilities and funding.

The National Planning Policy Framework (NPPF) published in March 2012 (Paragraph 112) states:

1. *Local Planning Authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, Local Planning Authorities should seek to use areas of poorer quality land in preference to that of a higher quality.*

*The best and most versatile land is defined as Grades 1, 2 and 3a by Policy guidance (see Annex 2 of NPPF).*

The Diagram below clearly identifies 4 major sites of Best and Most Versatile Land 3a that will be lost forever if the LOCAL PLAN allows this land to be used for housing, employment and roads. This means the LOCAL PLAN is prepared to ignore the NPPF and build on Best and Most Versatile Land even when other sites with very poor quality land are available throughout the West of England Combined Authority – many of which are far closer to the urban areas where housing is needed.

Please see the attached Document for a copy of the Diagram which is referenced above.

Source Documents:

http://publications.naturalengland.org.uk/file/5732147682869248

http://publications.naturalengland.org.uk/file/4424325

## Employment:

Although there are sites allocated to business use, it is unlikely that businesses suited to the skill set of residents of the village will locate here. It is more likely that this land becomes warehousing which has low employment needs, or as has recently been the case nearby in Thornbury, land which was initially set aside for employment use has been given over to more housing.

Charfield has virtually no business or industry to provide additional employment in the area. The largest business in the locale is Renishaw in neighbouring Gloucestershire to the North, but this would provide for a handful of jobs, at best, and those would be specialist in nature. Yet the Plan seems to rely upon them employing many of the new residents.

## Sustainability:

The LOCAL PLAN claims that Charfield will become a more sustainable settlement, but there are no actual plans laid out for how this will happen. The LOCAL PLAN is only paying lip service to the phrase and does not play an active role in guiding development to sustainable solutions.

The LOCAL PLAN, as far as it concerns Charfield, is only concerned with building houses and does not set out Strategic Priorities for transport, communications infrastructure, sustainability, health or the environment. This is in direct conflict with the requirement for Plan making as described in the National Planning Policy Framework.

Even though Charfield is in a rural area, the Council has not co-operated with neighbouring Gloucestershire Authorities, and the Local Planning Authorities have not been responsive to local circumstances and planned housing development to reflect local needs.

There is no mention in the LOCAL PLAN of setting out a Housing Implementation Strategy and describing how they will maintain delivery of a five-year supply of housing land to meet their housing target.

The only Key Partners that the Planners worked with were Land Owners and Developers who stood to make a fortune from the Plan. There is zero effective co-operation with residents.

There is no need for more housing in this area. Housing demand should be met closest to where it is needed.

During the JSP 15/16 processes the Local Authorities requested that landowners offer up land that could be used for housing development, as part of the Call for Sites. It has become clear in the 2018 Local Plan that the Strategic Development Locations have been chosen where the land has been offered from one landowner thus making the administration easier for the Council, rather than choosing locations based upon their suitability or where housing is needed.

As you will see from the before and after Map below, before the Call for Sites, Charfield was (and is) a small rural village served only by small B Roads, yet if Charfield is to be branded as a Strategic Development Location, it will be more than twice the size it is now, with no commitments to any infrastructure, health services or transport solutions.

Please see the attached Document for the before and after Map which is referenced above.

| | |
|---|---|
| | **Reference to Previous Versions of the LOCAL PLAN:**<br><br>In comparing the 2017 Plan with the 2015 and 2016 versions it can be seen that Charfield was not, at that time, considered a Strategic Location, but a settlement suited to smaller development (less than 500 homes). The 2015 JSP describes Charfield as "*Travel options are limited, although local congestion is, in many cases, less severe than the more urban locations. There are generally limited opportunities to limit car dependency for new developments in these locations. Generally small-scale development would take place with relatively modest packages of transport improvements, but in most cases car use would remain high.*"<br><br>There is no explanation given for the change from Charfield being a "*smaller development*" of under 500 houses in the 2015 Plan, to being an "*other town expansion*" of up to 1,000 houses in the 2016 Plan, to a Strategic Location for 1,200 houses in the 2017 Plan. This is not a Strategic Plan, this is the Council looking for an easy way to mass-build houses "under the radar" and with little regard to the needs of the existing residents.<br><br>The LOCAL PLAN goes against its own stated Strategic Priorities of "*Infrastructure: To ensure a Spatial Strategy where new development is properly aligned with infrastructure*" and the associated Spatial Implication that "*Strategic development should be in locations which maximise the potential to reduce the need to travel or, where travel is necessary, maximise opportunities to travel by sustainable, non-car modes, especially walking and cycling or be in places accessible to existing or new high quality Public Transport links. The focus of new transport infrastructure should address both existing challenges and create capacity for sustainable growth,*" having already stated that Charfield is in a location where travel options are limited and car use would remain high.<br><br>The 2015 JSP Consulted on the basis of small-scale development and the local Response was to concentrate on transport and protect green space. There was no mention at that time of new development areas. The results from this Consultation were then misused to justify Charfield as a Strategic Development Area. South Gloucestershire Council seem to only Consult in order to say they have done so. They consistently ignore the results and go directly against the wishes of those they have Consulted.<br><br>**Conclusion:**<br><br>The LOCAL PLAN should not be accepted, on the grounds laid out in this Response. The Local Authority should be asked to look again at their aims for providing sustainable development in the area, and should be asked to focus on a Plan that provides housing that meets the requirements of reducing the traffic burden, rather than increasing it; a Plan that provides for proportionate growth, not overwhelming development; a Plan that includes the necessary infrastructure of education, health and social welfare; a Plan that is actually sustainable, not just claiming that it is.<br><br>In the recent Autumn Budget Statement, the Chancellor of the Exchequer stated "*We will focus on the urban areas where people want to live and where most jobs are created. Making best use of our urban land, and continuing the strong protection of our Green Belt. In particular, building high quality, high density homes in City Centres and around transport hubs*" (Hansard Column 1058).<br><br>In planning to increase unsustainable house building in Charfield the LOCAL PLAN presents itself contrary to its own Mission Statement (to be consistent with national Policy) and sets itself directly against Central Government Policy and aspirations. |
| **Attached documents** | Mrs. Tracey Whawell.pdf (553 KB) |

| | |
|---|---|
| **Respondent Name** | Andrew Rigler |
| **Comment ID** | 1029377/1042 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sir/Madam.<br><br>Re: the above Document.<br><br>I would make the following Comments:-<br><br>1. The Local Plan refers to the need to satisfy the JSP which has not as yet been Examined or Approved (See P. 22, Para 2.9 as an example). It must therefore be largely speculative and possibly a profligate use of funds.<br><br>2. To consider the proposed new Garden Village at Buckover as anything other than an extension to Thornbury is frankly a joke.<br><br>Having achieved personal transport, folk will be very reluctant to lose it. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | D. I. Watson |

| | |
|---|---|
| **Comment ID** | 19844929/1046 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **D. WATSON'S COMMENTS – SOUTH GLOUCESHIRE LOCAL PLAN 2018 - 2036:**<br><br>This Document seems only to address the requirements for new homes to the exclusion of the existing local population, especially those who live in a more Rural Location.<br><br>The Plan admits that there is existing traffic congestion and problems, within the area, due to lack of past investment in infrastructure yet it does not provide or suggest any measure to address the problems. There is no mention in the whole of the Document of any of the existing HGV traffic problems on the local 'B' Road rural network. These problems have been to a large extent created by S. Glos Policy of locating Logistic Depots in areas where there is no Motorway access and no suitable 'A' Road connecting to the Motorway Network.<br><br>There appears to be no impact assessment to show what effect that the new housing will have on the existing surrounding population. Are these areas capable of accepting these large Housing Estates? Can the local power, water, drainage and Internet systems take the increase in demand? What is the impact on local GP Practices and health care? All this new housing, which could reach some 30,000 new homes, will lead to a large increase in the commuter traffic within the S. Glos area and routes to and from Bristol, adding to the existing traffic problems.<br><br>One thing that the Plan does mention is that cycling is a priority (Section 1.27). To 90% of the S. Glos people and to the majority of the new residents of these homes this is not a priority. Local Transport is very poor and is likely to see further reductions in funding and services in the future. Cars are the only realistic answer to the majority of S. Glos residents to get to and from work and shop. The Document also seems to treat S. Glos in total isolation to the adjacent Authorities areas. It ignores any impact that the Filton Airfield housing developments will have on the A38 traffic flow in and out of Bristol.<br><br>This Local Plan is flawed and should be re-visited to take into account the needs and problems of the existing communities rather than solely concentrating on the need for future house building. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Aileen Acton |
| **Comment ID** | 19844865/1049 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **South Glos New Local Plan Consultation:**<br><br>Please find below my Comments for the above New Local Plan.<br><br>Firstly, this Document is premature. The JSP still has to undergo its Examination in Public. Therefore we cannot know what will be included. This Document seeks to convert the JSP into the Local Authority's Plan by showing where and when housing will be delivered. It endeavours to prepare the ground for an overlapping process so that Buckover is Approved prior to the adoption of the Local Plan.<br><br>South Gloucestershire Council (SGC) is failing in its duty to identify and deliver infrastructure that will be required to deliver this housing. SGC is alone in the four Local Authorities in not specifying which transport infrastructure is a pre-requisite for the Strategic Development Locations to go ahead. Yes we have heard rumours that the **MetroBus will NOT be Extending North to Thornbury/Buckover.** Surely this Authority has a statutory duty to explain what transport infrastructure it proposes and how this will be funded. SGC is clearly failing to do this and guarantee that these developments will only be allowed to go ahead if the infrastructure is built first.<br><br>Instead the Document goes to lengths to describe the challenges that SGC faces. These are congestion, pollution from commuting traffic. How infrastructure has failed to keep pace with development. However, the Document offers no solution in real terms. It appears that SGC is committed to increasing the level of CO2 emissions and could be construed as willful neglect of duty with regard to CO2 emission targets.<br><br>Lastly, the JSP uses the Strategic Housing Market Assessment (SHMA) as the basis for its forecast demand. A "market adjustment" to tilt the balance in favour of supply is then added to provide an Objectively Assessed Need (OAN) of 97,600 houses for the overall West of England target. This compares with a planned build of 105,500, which gives a margin for error of 8%. This build estimation is then allocated to the four Authorities, resulting in a South Gloucestershire target of 32,500. Given that the SHMA forecast is prepared on a Local Authority basis, thus we can compare this allocated build target with an OAN for South Gloucestershire of 24,000. This gives an astonishing margin of a 35% excess build over forecast need.<br><br>Is it that South Gloucester has the desire to create artificially high requirements to justify Buckover or that the Authority has negotiated poorly? The consequence as I see it is a loss of Greenfield space, an increase in CO2 emissions, congestion and decreased capacity for our infrastructure. It makes it much more likely that the Authority to be perpetually is below its build out rate. (The five year land supply) which leaves us vulnerable to speculative developments. The Local Plan has no choice but to take the allocated build within the JSP. However, I would like to know **WHY THIS AUTHORITY HAS VOLUNTEERED TO TAKE SO MANY MORE HOUSES THAN THE FORCAST DEMAND REQUIRES?** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Janet A. Gregory |

| | |
|---|---|
| **Comment ID** | 7920321/1054 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sir or Madam,<br><br>Set out below are my Comments on the Local Plan.<br><br>1. **The Timing of the Local Plan:**<br><br>Timing is premature because the Joint Spatial Plan (JSP) has not yet been Examined by the public and the number of houses to be built in Thornbury and environs has not yet been decided. The Local Plan cannot simply assume that the numbers proposed will be accepted and agreed.<br><br>1. **The Proposed Number of Houses:**<br><br>The JSP uses the Strategic Housing Market Assessment (SHMA) as the basis for its forecast demand. Onto this is added a "market adjustment" (to tilt the balance in favour of supply) to derive an Objectively Assessed Need (OAN) of 97,600 houses for the West of England overall. This compares with a planned build of 105,500, giving a margin for error of 8%. This build is then allocated to each of the four Authorities, of which South Gloucestershire gets 32,500. However, the SHMA forecast is prepared on a Local Authority basis, so we can compare this allocated build target with an OAN for South Gloucestershire of 24,000**.** This gives an excess margin of a 35% excess build over forecast need. South Gloucestershire should not be proposing this large number of houses when they are not required. However it would seem it has included such a large number to enable it to include the Buckover Development which has not been agreed and is opposed by over 90% of the population of Thornbury and Falfield.<br><br>3. **"Sustainable Development"**<br><br>The Local Plan trumpets the need for "Sustainable Development" but the Report does not set out any concrete or practical Plans to achieve this. Page 12, Paragraph 1.28 states that the levels of car ownership "… are high and congestion hotspots are a significant problem…. (and that) … infrastructure in transport has been insufficient. Yet there are no proposals to improve Public Transport. South Gloucestershire is the only one of the four Authorities in the JSP that has not specified which transport infrastructure projects are a pre-requisite for the specified Strategic Development Locations to go ahead. Recently it was announced on the South West BBC News that a number of the planned MetroBus routes that have already been built will not be introduced and it is now understood that the scheme to introduce a MetroBus for Buckover/Thornbury is not going to happen. In any event the MetroBus will be totally inadequate in dealing with increased transport needs with the result that most people of working age moving into the area will need to commute by car (because there are so few job opportunities in Thornbury) worsening the traffic congestion and air quality problems that have already been identified. This Authority has a statutory duty to explain what transport and infrastructure it proposes and how this will be funded, which it is clearly failing to do, and to guarantee that these developments will only be allowed if the infrastructure is built first.<br><br>1. **TRAPP"D:**<br><br>In addition to the Comments set out above, I support the Comments submitted by TRAPP"D on the Local Plan. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Felicity Harrison |
| **Comment ID** | 4391425/1057 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear South Gloucestershire,<br><br>Concerning the Local Plan I would like to Comment that I find it incomprehensible that you should be producing a Plan whilst at the same time asking us to produce a Thornbury Neighbourhood Plan. The two do not appear to fit together and I would suggest that your actions are premature and should wait until we have finished what we are working on first.<br><br>However, here goes with some Comments which have arisen. These concern the following: |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Gill and Mike Dunkley |
| **Comment ID** | 19845441/1061 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | This iteration of the Local Plan says little. It purely details a list of aspirations and puts no flesh on the bones as it were. |

| | |
|---|---|
| | We were subjected to a number of 'Consultations' in the Autumn of 2017 at the so called 'Strategic Location Sites' … but this Document glosses over those Consultations and glibly suggests that they 'will deliver a MINIMUM of 6,000 houses' in line with the JSP and takes no heed whatsoever of the Responses that were made re: the proposed locations of housing/employment/infrastructure etc.<br><br>You are our Local Planning Authority, you have Consulted and those Consultations should have led you to some fundamental conclusions about what has been previously proposed and at the very least, one would have expected to see some preliminary modifications to those proposals … or are we going to be presented with a final Plan on which we have no chance of any iteration?<br><br>We are currently being bombarded in Thornbury by speculative Planning Applications/Appeals, totally undermining the Planning process. An iteration of the proposed Local Plan detailing the local community input would at the very least demonstrate how the local community wishes its area to develop, in the intervening period before these Plans are adopted. At the very least, given that Thornbury has already exceeded the levels of housing detailed in the Core Strategy to 2026, one would expect this iteration of the Local Plan to be proposing a total halt on any further development in the intervening period to the adoption of the Local Plan would be prudent, to allow assimilation of that excess and a proper assessment of the impact on the infrastructure etc … as any associated assessments are already out of date.<br><br>It seems throughout this Document and in any Planning Application, *the Developer* has the upperhand … **This is fundamentally wrong**.<br><br>The Planning process should be there to lead, generate and ensure that we end up with properly planned, cohesive, sensibly linked and vibrant communities …. instead we are being faced with bolt on, destructive housing conurbations, that destroy community, infrastructure and the wellbeing of local inhabitants, because Plans are purely determined by what land is 'offered by landowners/developers' – there is no true Planning. Current and future generations will not thank us.<br><br>Fundamentally,<br><br>• What is the TRUE South Glos housing need? The OAN says 24,000 … so why is there provision for 32,500? .... Some of which have already been given Planning Permission? With developers pressuring for more before the Plan is even in place.<br>• Infrastructure is already creaking at the seams. I suggest Planners travel down the A38 from Thornbury to Bristol at any time of the day and see the excess of traffic that it is now carrying. Heaven help us when we reach weekends in the Summer. We all joke about the M25 being an orbital car park around London … we now have our own too. The M5 too, has traffic levels that are totally unsustainable going forward. Regularly there is slowed traffic at Almondsbury and at Portishead …. and it is frankly dangerous …. accident profiles must clearly show there is an increasing Highways problem. Fundamentally, housing needs to be where the employment is. That negates the need to travel, frees roads, reduces emissions/pollution etc, increases a person's life productivity (travel time is wasted time) and wellbeing. It will reduce car journeys to work/Schools (if they are local, they just might walk!), clogging up of roads with extra cars etc.<br>• Local infrastructure in terms of Schools, health services, buses etc are all suffering and none of this is positively addressed in this Local Plan Document.<br>• The Local Plan should make provision for the maintenance of true Wildlife 'Corridors' (both flora and fauna) between settlements.<br>• Lighting should be kept to a minimum as this is detrimental to both flora and fauna. South Glos should create a Policy which requires any 'disturbance' of hedgerows/verges as well as development land, to incorporate re-seeding with native wildflower species to encourage the rejuvenation of our native flora and hence encouraging bee populations etc. This would reduce the need for mowing of verges etc whilst improving the visual impact.<br><br>• Fundamentally Buckover must be recognised as being an unsustainable location. There has to be a 'proportionate gap' for it to be seen as a separate entity from Thornbury. There is not! If Buckover fails, that **must not** be seen as being the green light to further extend the boundaries of Thornbury to accommodate a similar number of houses.<br>• Employment land in Thornbury should remain in the vicinity of the current Industrial Estate …. nothing else should be placed on the fringes as this will provide a facility for developers to suggest there is employment close to extended housing developments on the fringes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hilary Bridgewater |
| **Comment ID** | 19808993/1066 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Hello,<br><br>I wish to support all the statements made by Trapp'd in Thornbury.<br><br>I have lived in the area for  years and have been overwhelmed by the extensive housing developments now in progress and that are proposed for the future ruining our lovely countryside. It seems this area of natural beauty has taken far more than its share of new developments with no extra infrastructure.<br><br>The men of the local protest group have done all the research and I absolutely support everything they are saying. Their knowledge and understanding of the legalities of the situation is far greater than mine. I have sat through several Council Planning Meetings recently and have been very impressed with the gravitas of  and  from Trapp'd as they state the case for caution in proceeding further as it seems our obligations to the housing market have been fulfilled.<br><br>The proposed Buckover Garden Village scheme is in completely the wrong location.<br><br>Please listen to these learned men and take heed of what they are saying before it's too late. |

| | |
|---|---|
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kevin Simpson |
| **Comment ID** | 19839585/1068 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | To Whom it concerns,<br><br>I wish to endorse the views held by TRAPP'D i.e. Thornbury Residents Against Poorly Planned Developement whose Comments are shown below.<br><br>P.S. Please remember: HEALTH and SAFETY FIRST each and EVERY TIME.<br><br>"South Glos New Local Plan Consultation – Issues in a nutshell:<br><br>• South Gloucestershire Council is failing in its duty to take the Draft Joint Spatial Plan (JSP) for the West of England and convert this into a Local Authority based Plan to show how, where and when this housing will be delivered, and more importantly what infrastructure will need to be in place in order to deliver it. This is a lightweight Document that performs none of these functions.<br><br>• This Document is in any case premature, in that the JSP has yet to undergo its Examination in Public, and we cannot yet know what will be included. By the same token the Document seeks to prepare the ground for an overlapping process of Approval for Buckover prior to adoption of the Local Plan.<br>• The JSP uses the Strategic Housing Market Assessment (SHMA) as the basis for its forecast demand.<br><br>Onto this is added a "market adjustment" (to tilt the balance in favour of supply) to derive an Objectively Assessed Need (OAN) of 97,600 houses for the West of England overall. This compares with a planned build of 105,500, giving a margin for error of 8%. This build is then allocated to each of the four Authorities, of which South Gloucestershire gets 32,500. However, the SHMA forecast is prepared on a Local Authority basis, so we can compare this allocated build target with an OAN for South Gloucestershire of 24,000. This gives an astonishing margin of a 35% excess build over forecast need.<br><br>• We cannot tell if this outrageous excess is because our Authority has negotiated poorly, or simply desires to create an artificially high requirement to justify vanity projects such as Buckover. This excess build will have consequences for all of us; it means we lose more Greenfield space than we need to, absorb more strain on the infrastructure than is necessary, and endure more congestion and pollution than we should. It will also make it much more likely that this Authority is perpetually below target in its rate of build (the so-called five-year land supply rule) which gives open season for developers to build anywhere they like. The Local Plan has no choice but to take the allocated build within the JSP, but this Authority should come clean and explain why it has volunteered to take so many more houses than the forecast demand suggests.<br>• This Document is long on describing the challenges that South Gloucestershire faces (congestion and pollution through high levels of commuting; failure of infrastructure to keep pace with development etc), but then offers no explanation as to why the Spatial Strategy proposed (creating a separation between where people live and where they work) will do precisely the opposite of alleviating these problems.<br>• South Gloucestershire has a commitment to achieve specified reductions in the level of CO2 emissions which this Spatial Policy will all but guarantee to cause the Authority to miss. This is a willful neglect of duty which may also be illegal.<br>• South Gloucestershire is alone in the four Authorities in not specifying which transport infrastructure projects are a pre-requisite for the specified Strategic Development Locations to go ahead. In particular we hear rumours that the MetroBus will not be extending North to Thornbury and the proposed Buckover site. This Authority has a statutory duty to explain what transport and infrastructure it proposes and how this will be funded, which it is clearly failing to do, and to guarantee that these developments will only be allowed if the infrastructure is built first." |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Clifton Homes Ltd |
| **Comment ID** | 16617921/1089 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **Please see submitted Representations.** |
| **Attached documents** | Clifton Homes Ltd - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (1.7 MB) |

| | |
|---|---|
| **Respondent Name** | South West Strategic Development and Ian and David Knipe |
| **Comment ID** | 19884577/1114 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Please see submitted Representations. |
| **Attached documents** | SW Strategic Development and I. and D. Knipe - Grass Roots.pdf (27.4 MB) |

| | |
|---|---|
| **Respondent Name** | Progold Ltd |

| | |
|---|---|
| **Comment ID** | 19737665/1127 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Please see submitted Representations. |
| **Attached documents** | Pegold Ltd - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (7.9 MB) |

| | |
|---|---|
| **Respondent Name** | Susan E. Green - Home Builders Federation (HBF) |
| **Comment ID** | 10761601/1130 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sir/Madam,<br><br>**SOUTH GLOUCESTERSHIRE LOCAL PLAN CONSULTATION:**<br><br>**Introduction:**<br><br>Thank you for Consulting with the Home Builders Federation (HBF) on the above mentioned Consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our Representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built Affordable Housing. We would like to submit the following Responses in answer to specific Questions in the Council's Consultation Document.<br><br>**Conclusion:**<br><br>In conclusion it is hoped that these Responses are of assistance to the Council in informing the next stages of the new South Gloucestershire Local Plan. The HBF will submit further Comments on detailed wording of Draft Policies during the Council's next Consultation. In the meantime if any further information or assistance is required please contact the undersigned. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | University of the West of England |
| **Comment ID** | 19888641/1146 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | I have been instructed by the University of the West of England (UWE) to submit brief Representations to the Local Plan Consultation, covering the topics set out below.<br><br>Core Strategy Policy CS28 – This Policy specifically covers the Frenchay Campus and was drafted with input from UWE and myself as Planning Agent. This Policy has served well to support a range of projects that have come forward on the enlarged Frenchay Campus since the adoption of the Core Strategy. Accordingly, UWE would like to see a similar Policy retained in the new Local Plan. The text of the Policy is still broadly relevant but some amendments would be beneficial – to this end we would like to be involved in the re-drafting of this Policy at the appropriate time.<br><br>Furthermore, amendment of the accompanying red line Plan (Figure 8) is now necessary as UWE has purchased the residual building to the West from Hewlett Packard. The building will likely be retained in Class B1 usage for the time being but it should now be recognised as forming a part of the enlarged Frenchay Campus, particularly in the context of any Local Plan Policy.<br><br>Land to the West of the Wallscourt Farmhouse – This land was covered by the UWE Outline Consent (PT12/3809/O), as well as the Bristol Rovers Stadium Consent (PT12/0888/F). The latter lapsed at the beginning of 2018 and UWE is reconsidering its options for this part of the Campus. As part of this process, it is open to further discussions with the Council about its emerging proposals for the North Fringe of Bristol.<br><br>Local Economy – We welcome the following 'key issue' as noted on Page 15 of the Consultation Document: "*Meeting the longer term needs of existing and new businesses including key sectors and business clusters such as the aerospace industry, Science Park, Oldbury New Nuclear Build and the University of the West of England (UWE)*." UWE is keen to be involved in the wider delivery of education and economic development within South Gloucestershire, as well as the wider Bristol region, and looks forward to support from the Council for its further masterplan proposals over the next Plan Period.<br><br>An Application for a new Faculty of Engineering building has recently been submitted to the Council, which will essentially complete the 'heart zone' of the campus. Future proposals will be discussed with the Council in due course as they emerge. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Emma Powell - Redrow Homes Limited |
| **Comment ID** | 19737921/1150 |
| **Document Part Name** | Question 19 Other Comments |

| | |
|---|---|
| **Comment** | Part 2 - New Local Plan Strategy for Development<br><br>Para 2.1 – 2.9<br><br>Pages 18 - 24<br><br>Please see the attached Response Form for Comments relating to this Section. |
| **Attached documents** | NLP February 2018 Response Form - Part 2 LP Strategy.pdf (711 KB)<br>Redrow Homes Limited (Emma Powell) - Pegasus Group (Mrs. Sarah Hamilton-Foyn).pdf (34.1 MB) |

| | |
|---|---|
| **Respondent Name** | Emma Powell - Redrow Homes Limited |
| **Comment ID** | 19737921/1166 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Part 2 - Strategic Development Locations<br><br>Page 23, Para 2.10<br><br>Please see the attached Response Form for Comments relating to this. |
| **Attached documents** | Redrow Homes Limited (Emma Powell) - Pegasus Group (Mrs. Sarah Hamilton-Foyn).pdf (34.1 MB)<br>NLP February 2018 Response Form - Part 2 SDLs.pdf (1.5 MB) |

| | |
|---|---|
| **Respondent Name** | BAE Systems Pension Funds Trustees Ltd |
| **Comment ID** | 19738113/1168 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sir or Madam,<br><br>**REPRESENTATIONS TO THE SOUTH GLOUCESTERSHIRE LOCAL PLAN 2018 - 2036:**<br><br>These Representations are made in Response to the above Consultation Document on behalf of BAE Systems Pension Funds Trustees Ltd (the Landowner) and in respect of the Land at Filton 20 Business Park, Golf Course Lane, Bristol, BS34 7QQ.<br><br>**Site Context:**<br><br>Filton 20 Business Park comprises circa 12.2 hectares (30 acres) of mixed-use commercial space that is located off Southmead Road (B4056), Filton, Bristol. The site includes a number of low density buildings providing a mixture of production, warehousing and office accommodation. There is also significant areas of surface level car parking on site.<br><br>The site is part of a broader cluster of commercial and employment land located to the South of the former Filton Airfield and to the West of the A38. It is also within the wider Filton Enterprise Area which is a protected employment location in the adopted South Gloucestershire Core Strategy.<br><br>The site has no known physical constraints; it is Brownfield land and located within Flood Zone 1 (lowest risk). It can be readily accessed from the surrounding roads and route networks.<br><br>**Potential Use:**<br><br>As per the submitted Call for Sites Form, the site may become available for development within years 11 — 20 of the Plan Period. With this in mind, much of the commercial space on the site is becoming dated and in need of modernisation, whilst some of the warehousing space is proving difficult to let.<br><br>Should the site become available, the landowners are likely to pursue a partial or full redevelopment for an employment-led mixed scheme, although clearly this will need to have due regard to market signals for a variety land uses nearer to the time.<br><br>The site's location and historic use, particularly with regard to the aerospace industry is recognised, however an opportunity may arise in future years to improve the quality and amount of accommodation on site to meet any changes in commercial occupier requirements, whilst also making more efficient use of the site to provide a greater mix of uses. As such, these Representations are submitted to seek some flexibility of uses on the Filton 20 site, including for some non B-class uses depending on future market and industry requirements.<br><br>**Site Deliverability:** |

| | |
|---|---|
| | National Planning Practice Guidance sets out that when judging the deliverability of a site for Plan-making purposes an assessment should be made regarding the suitability, availability and achievability of a development occurring. These factors are addressed in turn below.<br><br>*Suitability:*<br><br>The site is developed land within the Settlement Boundary of the Bristol North Fringe. As per the Development Plan, the site is safeguarded land for economic development and lies within the Filton Enterprise Area. The Consultation Draft of the South Gloucestershire Local Plan does not include the site within the North Fringe Cluster area that is identified to meet the Plan's Urban Living objectives.<br><br>The site is well-located in the Filton area of the Bristol North Fringe, with good accessibility to local employment and services, high frequency Public Transport and higher education facilities. With this in mind, it is considered that the site is highly sustainable and is therefore suitable for an increased density in terms of employment accommodation and potentially some provision of alternative uses such residential or student. As such, the site is in accordance with the broad themes provided for the Plan's Urban Living objective and could make a meaningful contribution to this in the latter years of the Plan Period.<br><br>*Availability:*<br><br>The landowner owns the freehold of the full extent of the site outlined in the attached Plan. The landowner fully supports these Representations that are submitted on their behalf.<br><br>Whilst the site is operational and currently not available for development, it is possible that it may become available for development in years 11 - 20 of the Plan Period, either in part or in full. If this situation arises the landowners will seek to engage in a formal Planning process to achieve a desired Consent.<br><br>*Achievability:*<br><br>There is a reasonable prospect that the site, in part or whole, will become available for development in years 11 - 20 of the Plan Period. At which point, the landowners will seek to engage in a formal Planning process to achieve a desired Consent.<br><br>The precise use and amount of development is unknown at this stage, however it may include a mix of uses dependant on market requirements at the time any scheme is being drawn up. In doing so, there will be clear regard to the market demand from various types of occupiers to ensure that any scheme is commercially viable, and therefore achievable in the desired timeframe.<br><br>**Conclusions:**<br><br>In summary, the site should be considered appropriate for an employment led mixed-use redevelopment. It should be included in the South Gloucestershire Strategic Housing and Economic Land Availability Assessment as a site that is suitable, available and achievable for development within the Plan Period. Moreover, it is in a sustainable location and is in accordance with the Urban Living principles that are set out in the Draft Plan.<br><br>If further information regarding the site is required, please do not hesitate to contact me and I would like to be made aware of any further Consultation periods relating to the South Gloucestershire Local Plan 2018 - 2036. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Colin Garrett |
| **Comment ID** | 19732865/1173 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Part 2. New Local Plan Strategy for Development and Strategic Development Locations<br><br>Support of the commitment to follow the JSP Strategy, which identifies a range of different locations and scales of development. This will provide all of the benefits outlined in the Consultation Document and also gives the Council the following opportunities to capture the further local benefits that major new development can bring if planned correctly.<br><br>Enable a more balanced Transport Strategy to be implemented particularly the support and provision/accommodation of methods of green transport, both public and private and appropriate encouragement of the use of electric vehicles.<br><br>Helping to achieve wider delivery of sustainable energy solutions by providing new homes built to the higher standards of recent Energy Regulations.<br><br>A great opportunity to plan the cohesive integration, within existing communities, of the proposed Strategic Development Locations in South Gloucestershire, using Garden Village principles, to form a series of village developments enabling a joined-up Public Transportation Strategy, the provision of new recreation space and Green Corridors, expansion of community services and many other benefits to local people. This should also be an opportunity to gain Government funding to enhance the opportunities for early provision of the infrastructure required to enable the additional homes and employment, to be effectively accommodated within the Strategic Locations, rather than being a burden on existing communities. |

| | |
|---|---|
| | Support the selection of Thornbury as a location for large scale Strategic Development for the provision of new homes, employment and local services in this and future Local Plans. Secure the potential for expansion over future Local Plans by ensuring any additions to Green Belt are not drawn too tightly to the existing built environment of the Town. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Phill Bamford - Gladman Developments Ltd |
| **Comment ID** | 15612065/1174 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Please see the attached Document. |
| **Attached documents** | Gladman Developments Ltd (Phill Bamford).pdf (340 KB) |

| | |
|---|---|
| **Respondent Name** | Dianne Smith |
| **Comment ID** | 19452417/1186 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Good afternoon,<br><br>Please find my Response to the above Document.<br><br>**South Glos New Local Plan Consultation – Issues:**<br><br>• South Gloucestershire Council is failing in its duty to take the Draft Joint Spatial Plan (JSP) for the West of England and convert this into a Local Authority based Plan to show how, where and when this housing will be delivered, and more importantly what infrastructure will need to be in place in order to deliver it. This is a lightweight Document that performs none of these functions.<br><br>• This Document is in any case premature, in that the JSP has yet to undergo its Examination in Public, and we cannot yet know what will be included. By the same token the Document seeks to prepare the ground for an overlapping process of approval for Buckover prior to adoption of the Local Plan.<br>• The JSP uses the Strategic Housing Market Assessment (SHMA) as the basis for its forecast demand. Onto this is added a "market adjustment" (to tilt the balance in favour of supply) to derive an Objectively Assessed Need (OAN) of 97,600 houses for the West of England overall. This compares with a planned build of 105,500, giving a margin for error of 8%. This build is then allocated to each of the four Authorities, of which South Gloucestershire gets 32,500. However, the SHMA forecast is prepared on a Local Authority basis, so we can compare this allocated build target with an OAN for South Gloucestershire of 24,000**. This gives an astonishing margin of a 35% excess build over forecast need**.<br>• We cannot tell if this outrageous excess is because our Authority has negotiated poorly, or simply desires to create an artificially high requirement to justify vanity projects such as Buckover. This excess build will have consequences for all of us; it means we lose more Greenfield space than we need to, absorb more strain on the infrastructure than is necessary, and endure more congestion and pollution then we should. It will also make it much more likely that this Authority is perpetually below target in its rate of build (the so-called five-year land supply rule) which gives open season for developers to build anywhere they like. The Local Plan has no choice but to take the allocated build within the JSP, but t**his Authority should come clean and explain why it has volunteered to take so many more houses than the forecast demand suggests**.<br>• This Document is long on describing the challenges that South Gloucestershire faces (congestion and pollution through high levels of commuting; failure of infrastructure to keep pace with development etc), but then offers no explanation as to why the Spatial Strategy proposed (creating a separation between where people live and where they work) will do precisely the opposite of alleviating these problems.<br>• South Gloucestershire has a commitment to achieve specified reductions in the level of CO2 emissions which this Spatial Policy will all but guarantee to cause the Authority to miss. This is a willful neglect of duty which may also be illegal.<br><br>South Gloucestershire is alone in the four Authorities in not specifying which transport infrastructure projects are a pre-requisite for the specified Strategic Development Locations to go ahead. In particular we hear rumours that the MetroBus will not be extending North to Thornbury and the proposed Buckover site. This Authority has a statutory duty to explain what transport and infrastructure it proposes and how this will be funded, which it is clearly failing to do, and to guarantee that these developments will only be allowed if the infrastructure is built first. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Esso Petroleum Co Ltd |
| **Comment ID** | 20000609/1187 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | ESSO PETROLEUM COMPANY LIMITED/FAWLEY TO AVONMOUTH:<br><br>Thank you for your correspondence dated 2nd February 2018 enclosing details of the Local Plan Consultation Document.<br><br>Our Client, Esso Petroleum Co Ltd, do have apparatus situated near the proposed works. Esso Petroleum Co Ltd have no objections to the proposals so long as the enclosed 'Special Requirements for Safe Working' Booklet and the Covenants contained in the Deed of Grant are adhered to. |

| | |
|---|---|
| | Thank you for forwarding this information to us. |
| **Attached documents** | Esso Petroleum Co Ltd - Fisher German LLP (Joanna Atkinson).pdf (9.8 MB) |

| | |
|---|---|
| **Respondent Name** | The Tortworth Estate Company |
| **Comment ID** | 16641633/1195 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | 1 **Introduction:**<br><br>1.1 This Submission is made on behalf of the Tortworth Estate Company. The Estate covers an area of circa 2,000 hectares within South Gloucestershire Council's area and is fragmented into several parcels of land within the Civil Parishes of Charfield, Cromhall, Falfield and Tortworth. The settlement of Cromhall (Bibstone and Townwell) falls within Tortworth Estate. Land at the edges of the settlements of Charfield, Falfield and Wickwar fall within the Estate's landholdings.<br><br>1.2 The Tortworth Estate is a long established custodian of land and buildings; since 1620. While agriculture has traditionally been the main land use on the Estate, the Estate's principal business now includes a variety of rural economic development activities, including the management of residential and commercial properties. It has a diverse portfolio of properties; from the traditional farmhouses and estate cottages, to a Primary School and two road-stone Quarries. The properties, both residential and commercial, are maintained to a very high standard by the Estate's own Maintenance Department.<br><br>1.3 In additional to its environmental stewardship, the Estate is a significant contributor to the local economy. Many of its buildings accommodate businesses who in turn generate employment and economic growth.<br><br>1.4 The Tortworth Estate has actively engaged in discussions on the emerging West of England Plan and the South Gloucestershire Policies, Site and Places Plan.<br><br>**2 New Local Plan Strategy for Development:**<br><br>2.1 Past iterations of the South Gloucestershire Development Plan have principally focussed development on large Strategic Sites predominantly around the edges of Bristol, as those locations were interpreted at that time as representing the most '*sustainable'* locations.<br><br>2.2 It is the Tortworth Estate's case that to a large extent, that City focused Strategy has ignored the needs of the rural and other communities of the District. Which in turn has had a negative impact on housing affordability, economic equality, job creation, economic growth, social isolation and a general lack of investment in facilities and services (both by the Public and Private Sectors).<br><br>2.3 Over recent years National Planning Policy has seen a sea-change, recognising how our rural communities might be rather than writing them off as being '*unsustainable'*1.<br><br>2.4 The Framework is clear at Paragraph 28 that Planning Policies should take a positive approach to sustainable development. This includes promoting the retention and development of local services and community facilities in the rural areas. As such, Paragraph 55 is supportive of housing where it will enhance or maintain the vitality and viability of rural communities.<br><br>2.5 With regard to thriving rural communities, the Housing White Paper (February 2017) set out that the Government expects Local Planning Authorities to identify opportunities for rural settlements to thrive especially where this would support services and help meet the need to provide homes for local people who currently find it hard to live where they grew up. The emerging changes to the Framework (March 2018) state in Paragraph 80 that:<br><br>"*To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Plans should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support the services in a village nearby.*"<br><br>1 The Taylor Review of Rural Economy and Affordable Housing.<br><br>2.6 Through the JSP process, the Tortworth Estate has submitted a sustained case that can be summarised as follows:<br><br>o A continued Strategy solely based on an urban focused reliance of building more homes as bolt-on's to Bristol and the main towns, and a reliance on unlocking difficult Brownfield sites, is considered to be a vulnerable and a high risk Strategy for the delivery of the additional dwellings required within the wider Bristol City region. Particularly so, if a significant boost in the delivery of new homes is to be achieved. It has been set out by the Estate that the previous focus on "Bristol bolt-on development" has proved lacking and it has been demonstrated that it has left South Gloucestershire Council with 'too many eggs in too few baskets.'<br><br>o Instead, given that the past urban-led Strategy has proved unsuccessful in delivering the levels of housing development required2, the Estate has advocated a more balanced approach. The Estate set out that the Emerging JSP ought to widen the supply and delivery mechanisms to ensure housing need is met, and that it is met in a manner that addresses the needs of the wider area of South Gloucestershire.<br><br>o Moreover, and fundamentally, the Estate has made the case that the past urban-led Spatial Planning Strategies have significantly failed the rural areas on matters of housing supply and affordability; as well as economic equality, access to jobs and strategic infrastructure investment within the rural areas. |

o It has been demonstrated that the national evidence is such that 'bolt-on' urban extensions often do not result in a 'sustainable' form of development. The Estate has set out the case that, instead, the rural areas should be planned in a manner that they are allowed to escape the "sustainability trap"3 too many rural communities are caught in. What is required is a Development Plan approach that is based on recognising how our rural communities can be, rather than writing them off as unsustainable. The question to be addressed in "how will development add to or diminish the sustainability of this community" and include social, economic and environmental factors in the answer.

o The Estate also set out the case that a more dispersed approach to Spatial Planning will avoid the suppression of delivery which is found when competing landowners and outlets are located within close proximity. The Estate has presented the case that the JSP Authorities should accept that rural locations ought to make a strategic contribution to the development needs of the JSP area. The Estate set out that it sees such an approach as a part of a Strategy which will need to be combined with other elements such as Urban regeneration, Urban extensions, Town expansions and new settlements. In essence, the Estate called for a Spatial Strategy that introduces a variety of housing and employment delivery mechanisms and models.

2 Evidenced by the significant backlog against existing Development Plan requirements, and evidenced by South Gloucestershire's 5 year housing supply deficit.
3 The Taylor Review of Rural Economy and Affordable Housing.

2.7 The Tortworth Estate is therefore supportive of the New Local Plan Strategy for Development as set out within Part 2 of the Local Plan Consultation Document (Feb 2018); namely, completion of strategic developments, maximise Brownfield land in urban areas, Strategic Development Locations and smaller scale development in rural areas. The Estate supports the LPA's approach and the key aim of the emerging Local Plan to support small scale development to meet the needs of rural communities (Page 4). That approach is supported by the Draft Framework (Paragraph 69) which acknowledges the importance of smaller sites, which are likely to be found in the rural areas.

2.8 However, the Estate believes that the Emerging Plan should express as a *minimum* figure the need for an additional 1,300 new homes within the rural areas. The Estate welcomes the approach within the Emerging Local Plan to identify a contingency for an additional 500 dwellings within the rural area.

2.9 Of course the Emerging Local Plan is not just all about housing. The Estate therefore fully supports, and welcomes, the LPA's approach to the long term vitality, vibrancy and sustainability of rural communities as expressed at Page 55 of the Local Plan Consultation Document. The Estate supports the approach to non-strategic growth as expressed at Paragraph 2.50 of the Consultation Document; i.e. "*growth will need to be sensitive to the existing scale of each settlement and have a positive impact on the character and function of communities."* The Estate would welcome a discussion with the LPA on how that objective can be translated into meaningful and practical Policy terms.

2.10 Equally, the Estate would welcome a discussion with the LPA on how the Emerging Plan might deal with sites of fewer than 10 dwellings. Often it is that scale of development that is required, delivered throughout the Plan Period in an organic manner, to sustain the smaller rural communities.

2.11 For developments of greater than 10 dwellings, the Estate agrees with the LPA's approach set out at Para 2.67 and Table of the Consultation Document.

2.12 The Estate is mindful that the above Comments are housing centric. This is because the Comments respond to the issues set out within the LPA's Consultation Document. However, the Estate believes that rural economic development and rural social welfare issues are equally important and should be addressed within the Emerging Local Plan. The Estate would welcome a discussion with the LPA on how the Emerging Plan might tackle those issues.

2.13 The Estate believes Option 1 (Rural Places Outside the Green Belt), as set out within Para 2.72 of the Consultation Document, is the most appropriate Development Strategy for the Emerging Local Plan to adopt.

2.14 In light of the above Comments, the Estate submits 'Call for Sites' Forms for modest and organic growth at the following sites:

o Land Adjacent to Ducie Close, Cromhall - Circa 10 - 14 dwellings.

o Land at Longcross Farm, Cromhall - Circa 30 - 40 dwellings and community space.

o Land at the Junction of Bristol Road and Knapp Lane, Cromhall - Up to 25 dwellings and community orchard with public open space.

o Land at Charfield - Up to 50 dwellings and public open space ***OR*** a mixed use circa 25 dwellings and employment space.

o Land at Chase Lane, Wickwar - Up to 30 dwellings.

o Land at Woodend Farm, Cromhall - Circa 350sqm of employment land.

2.15 With reference to the sites at Cromhall, the Estate's approach would be to release sites in a sequential approach throughout the Plan Period to maintain an organic and sustainable growth pattern during the life of the Plan, and as and when needs arise.

2.16 Additionally, the Estate has included its land at Junction 14 of the M5 within its Call for Sites Submission; to help address the acknowledged need for a Park and Ride facility in that vicinity helping to enhance the District's transportation infrastructure.

**Attached documents**

| | |
|---|---|
| **Respondent Name** | Bovis Homes Limited |
| **Comment ID** | 20044801/1199 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Please refer to enclosed letter. |
| **Attached documents** | Bovis Homes Limited - Rapleys LLP (Mr. Tony Clements).pdf (259 KB) |

| | |
|---|---|
| **Respondent Name** | Lidl UK GmbH |
| **Comment ID** | 20050593/1209 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Please see the attached Document. |
| **Attached documents** | Lidl UK GmbH - Rapleys LLP (Taya Cotterill).pdf (821 KB) |

| | |
|---|---|
| **Respondent Name** | Michael L. Neale |
| **Comment ID** | 15617057/1225 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sirs,<br><br>Having read the Section relevant to Thornbury my concern is that from recollection a number of Comments related to the town's development have been overlooked/avoided/ignored in the overall analysis. These Comments, although few were in essence the most important as they dealt with basic infrastructure.<br><br>1. Infrastructure: Can anyone answer in a coherent manner how a town can be developed without first determining what basic infrastructure is required and then and once decided, organise the funding for those parts that need to be developed before any housing is built plus other concomitant facilities are planned. The Council knows that rain water run off is a priority and yet the Local Plan and the JSP are hell bent on creating Buckover. Foul Water, Electricity Supply and Roads are all acknowledged as being a vital precursor to the development of the town but where are the Outline Plans?<br><br>1. Observations at the public Consultation that the town should be developed to the West. Again, no mention. Surely any competent Town Planner - and I have worked alongside them for most of my working life - would see that the logical, and sensible Plan would be to expand the existing town to the West, creating a town in the round, utilising inferior agricultural land as compared with the highly productive fields to the East. I appreciate there are problems but none that in basic infrastructure terms do not already apply to the proposed development to the East. Historical and conservation arguments may also be used but having a Qualification in any such argument is easily and logically dealt with. Green Belt will be cited but again it is said that it is 'Bristol Green Belt.' Here again the argument is hardly relevant as developable land lies at the foot of the adjacent escarpment.<br><br>1. Housing: National commentators are at long last beginning to query the Government's adherence to the current needs projections. Where is the pressure for housing in Thornbury? Where is the Town Plan allocating areas for commercial development which if existed would attract business and then housing? S. Glos (and predecessor) has had four Decades to develop such. Nothing!! Who wants a journey time of 60mins plus when without congestion 20 to 30mins is the norm.<br><br>1. Buckover. A blot on the landscape - not the existing but the proposed. It is beyond belief that any sane intelligent individual could dream up such a proposal. Look at an Ordnance Survey Map, look at the landscape, just simply develop Tortworth - it's under developed and has easy (with improvements) access to the M5.<br><br>1. Transport. MetroBus appears to be developing into a joke! As a starter I would suggest an analysis of the current and projected users and type of vehicles really needed to provide an effective and efficient service. Look at similar projects elsewhere in the World, there are plenty of them.<br><br>Light Rail Mass Rapid Transit Systems: Revitalising the existing mineral line to Yate will be another joke. It will not be used, journey times are just too long. Rather look at a more direct route to Bristol - it's quite obvious - and protect that.<br><br>I could go on but in addition will, as well endorse TRAPP'D Comments. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | P. J. Waller |
| **Comment ID** | 19832129/1227 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sir,<br><br>South Glos Local Plan Consultation:<br><br>I have studied the published Documentation on the new Local Plan. Much of it uses language which is hard to argue against but could be used to justify almost any course of action. The Americans call this “Motherhood and apple pie.” |

| | |
|---|---|
| | There is one area where the Documentation falls down. Nowhere can I find a Policy such as the following:-<br><br>Funding must be secured for any infrastructure project before the existence of that project can be used as justification for a proposed residential development.<br><br>Without a Policy rule of this type we will be faced by Plans which include large residential projects justified on the grounds that new infrastructure will include (say) a large underground car park linked to key city location by a high speed underground Mag Lev rail system together with new employment in the form of a new factory building self-drive electric cars made with graphene!<br><br>I exaggerate for emphasis of course, but I make the point that such proposals can sound exciting until it transpires that no funding for the infrastructure nor any real intent to find it exists.<br><br>If you disagree then put your hand on your heart and tell me you can't think of a project where this has happened i.e. a development has promised housing and infrastructure but only ever delivered the housing.<br><br>If you fear that this Policy rule might eliminate some of the most exciting sounding Plans then consider where, when and if the funding for the infrastructure is likely to be found. The "when" is most important. If the Housing Plan is locked in before the infrastructure funding is secured then the infrastructure will never appear. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tom Clarke - Theatres Trust |
| **Comment ID** | 19883329/1229 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **South Gloucestershire Local Plan 2018 – 2036:**<br><br>Thank you for Consulting the Theatres Trust on the above Document.<br><br>We wish to reiterate our Comments made at the previous stage, whereby we recommend inclusion within your new Local Plan of a new or updated Policy which reflects existing Core Strategy Policy CS23 and the importance placed on planning for and protecting community and cultural facilities as set out within the existing and proposed revisions to the National Planning Policy Framework.<br><br>This Draft does not make reference to cultural facilities, which include not just theatres but also Libraries, museums, community centres, cinemas, Pubs and other performance venues. Neither does it discuss in any detail the scope of Town Centre Policies.<br><br>For compliance with the NPPF and to promote the cultural wellbeing of local people within your District we recommend inclusion of a specific Policy on cultural and community uses as we have suggested.<br><br>We look forward to further engagement on your new Local Plan as it is developed, and would be pleased to assist the Council with Policy drafting related to the uses discussed. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Messrs Keller, Grace, Moorlen and Barnes |
| **Comment ID** | 19889409/1241 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Part 1 (Housing Requirements) and Part 2 (Spatial Strategy) including Questions 1, 2, 3 and Strategic Development Locations:<br><br>Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Messrs Keller, Grace, Moorlen and Barnes - Pegasus Group (Mr. Daniel Weaver).pdf (423 KB) |

| | |
|---|---|
| **Respondent Name** | Reuben Bellamy - Lone Star Land Limited |
| **Comment ID** | 19738529/1243 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | OTHER – Page 56, Para 2.52:<br><br>Para 2.52 has mis-represented emerging Government Guidance as set out at Para 69 of the Draft National Planning Policy Framework (NPPF). |

| | |
|---|---|
| | Para 69 of the Draft NPPF states that to ensure a good mix of sites for housing development, Local Planning Authorities should *"ensure that at least 20% of the sites identified for housing in their Plans are of half a hectare or less."*<br><br>Para 2.52 of the Emerging Local Plan needs to be amended to reflect the emerging Government guidance. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Reuben Bellamy - Lone Star Land Limited |
| **Comment ID** | 19738529/1248 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | OTHER – Page 20, Para 2.5 (and associated text box):<br><br>The Consultation Document is somewhat misleading in its reporting of the housing numbers/requirement for the Local Plan Period 2018 - 2036.<br><br>The West of England Joint Spatial Plan (JSP) (November 2017, Submission Document) sets out at Policy 1 a requirement for South Gloucestershire to provide at least 32,500 dwellings over the Plan Period 2018 - 2036. Whilst the increased level of housing need set out in the JSP should be reflected in the Local Plan. It is noted that whilst supported in principle, the figures set out in the JSP are as yet untested, and are therefore subject to further change. The position taken by the HBF in their Representations to the JSP indicating that the Housing Market Area Objectively Assessed Housing Need has been under estimated is supported.<br><br>Furthermore, the Local Plan Consultation Document identifies a housing figure that will be provided through the 'build out of existing planned development.' In itself this is misleading as the Core Strategy covers the period 2006 - 2027, and the development identified could be delivering dwellings for the earlier parts of the Core Strategy period, meaning they would not contribute to the Emerging West of England Joint Spatial Plan or Emerging South Gloucestershire Local Plan.<br><br>It is well established at Para 47 of the National Planning Policy Framework (NPPF) that Local Planning Authorities should *"boost significantly"* the supply of housing in their areas and *"identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing."* In the absence of a five year housing land supply NPPF Para 49 identifies that *"relevant Policies for the supply of housing should not be considered up to date ...."* If the adopted Core Strategy Policies against which the PSPP is based cannot be considered up to date then in turn, when considered against NPPF Para 182, the PSPP cannot be considered sound.<br><br>The Emerging Local Plan should set out a clear Policy which identifies a minimum level of dwellings to be provided in South Gloucestershire over the Plan Period 2018 - 2036, and which reflects that in the JSP. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ailsa Collins |
| **Comment ID** | 19843585/1250 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Thank you for your e-mail. I have lost my original text but basically I fully support the Comments made in the Document put forward by TRAPPD, the local Residents Group. I imagine this is insufficient for the Planning Policy Team but I hope that fair consideration is given to the Group speaking on behalf of the residents of Thornbury. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Richard Bull - Environment Agency |
| **Comment ID** | 11527745/1254 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | <u>Strategic Development Locations (SDL):</u><br><br>The Environment Agency has already provided specific Comments in respect of the identified SDLs through its Response to the Joint Spatial Plan. It should be noted that recent modelling work could potentially assist with the master planning process (Charfield - a new model for the Little Avon, Yate/Chipping Sodbury - a new model for the Bristol Frome). This modelling can be requested free of charge via the Agency's Enquiries Team, email: WessexEnquiries@environment-agency.gov.uk<br><br>For information, please find hereunder a copy of the Agency's Response to the Joint Spatial Plan's Charfield, Thornbury and Yate SDL Templates:<br><br>Charfield:<br><br>The Agency supports the reference to "*A Green Infrastructure Network will enhance and protect the Little Avon River and its Flood Zone.*" As previously advised, the Agency has developed a new hydraulic model for the Little Avon watercourse, which should be used to inform this work. |

| | |
|---|---|
| | A relatively large historic landfill feature is marked as being present on the North West boundary of Charfield. The Agency must advise that this may pose a risk/challenge to any new developments within the locality of this feature. The landfill does not appear to have been noted in the submitted Documentation.<br><br>Thornbury:<br><br>The Agency supports the reference to "*Establish a Green Infrastructure Network that will protect Crossways and Cleve Wood, the setting of Hacket Farm, rural nature of Hacket Lane, Clay Lane and Crossways Lane, include SUDs features at Crossways to manage potential flooding at Crossways, and extend the Picked Brook Rhine streamside walk*."<br><br>The Agency is aware of flooding issues downstream in Oldbury-on-Severn being investigated by the LLFA. It is suggested the Green Infrastructure could provide oversized flood attenuation to reduce the risk of flooding downstream. South Gloucestershire Council has produced new hydraulic modelling, which could be developed by prospective developers or the Council to inform the design.<br><br>Yate:<br><br>The Agency notes and support the reference to "*A Green Infrastructure Network will reinforce a new Green Belt boundary, protect the river valley, linear settlement of Engine Common and Nibley Village, provide an attractive segregated route along the Frome Valley Walkway, and enhance North Road and the Frome River Corridor through the Beeches Estate*."<br><br>As part of the Bristol Frome Strategy, which is being led by South Gloucestershire Council, the Agency is proposing to deliver a Feasibility Study to identify a series of strategic projects and funding opportunities for the whole of the Bristol Frome catchment. This will include objectives to improve fish and eel passage and deliver strategic upstream flood storage. The Agency has previously provided a list of environmental opportunities, which includes details of its aims for this area.<br><br>Proposed developments would be required to provide reduced runoff rates and long term storage. Alternatively, the Agency would consider funding contributions in respect of the Yate and Chipping Sodbury Flood Defence Scheme.<br><br>Based on the currently available information, the Agency has no specific Comments regarding the Coalpit Heath and Buckover SDL Templates. The Agency must however, request formal Consultation in respect of proposals to progress any master planning/development proposals within the SDLs. The Agency will continue to engage with the ongoing programme of Individual workshops/stakeholder meetings.<br><br>With regard to Sustainability Appraisal (SA) issues, the Agency notes the Council's earlier Response to the Agency's Comments regarding the 2017 SA Scoping Report. The Agency would again recommend a general updating of the Council's SFRA Documentation, which would serve to inform allocation processes rather than simply being dictated by such.<br><br>Should you wish to discuss this matter further please call the undersigned direct. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Debbie Baker - Defence Infrastructure Organisation |
| **Comment ID** | 19836897/1269 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sir/Madam,<br><br>**South Gloucestershire New Local Plan: Consultation Document (February 2018):**<br><br>Thank you for Consulting the Ministry of Defence (MOD) in relation to the above referenced Consultation Document.<br><br>The MOD's principle concern relates to ensuring that tall structures especially tall buildings do not cause an obstruction to air traffic movements at MOD Aerodromes or compromise the operation of air navigational transmitter/receiver facilities located in the area.<br><br>As you will be aware air traffic approaches and technical installations at MOD Aerodromes are protected with Statutory Safeguarding Zones which identify Height Consultation Zones in the area surrounding MOD Aerodromes relative to topography and distance from the sites.<br><br>The aerodromes are also protected with Statutory Birdstrike Safeguarding Consultation Zones. Therefore, DIO Safeguarding is concerned with the development of open water bodies, the creation of wetland habitat, refuse and landfill sites. These types of development have the potential to attract large flocking bird species hazardous to aviation safety.<br><br>On reviewing the proposed areas for large scale developments: Charfield, Yate, Thornbury, Coalpit Heath and a New Garden Village at Buckover, the MOD can confirm these locations fall within sites outside our Safeguarding Areas (SOSA). However they are within areas where low flying military activity may take place. |

| | |
|---|---|
| | **Therefore any proposed development exceeding 50m AGL at Charfield, Yate, Thornbury, Coalpit Heath and Buckover should be referred to this office for review.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Nigel Gibbons - Forest of Dean District Council |
| **Comment ID** | 19831873/1271 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Thank you for your recent Consultation. Having briefly reviewed the Document, I have only a few Comments to make. The Strategy overall is supported as is that for the Emerging West of England Plan. Although the Forest of Dean District is a neighbouring Authority it has plainly a more distant relationship that that with say, Stroud. Nonetheless employment opportunities in South Glos and residential opportunities in the Forest of Dean are reasonably accessible if not the best in sustainable terms. Accessibility to and from the Forest of Dean especially via Chepstow is under review and FoDDC will continue to lobby for improvements especially to Public Transport.<br><br>FoDDC is at the very early stage of scoping a Plan Review and look forward to further two way Consultation and engagement between our Authorities. One issue to be examined will be the consideration of the FoDDC's relationship with and effects of planned growth in the West of England and the Cardiff City region. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sophie Cardinal - Hampshire County Council |
| **Comment ID** | 19828961/1272 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear ,<br><br>Thank you for your email regarding South Gloucestershire's Duty to Co-operate statement and proposed approach, as well as the South Gloucestershire Local Plan Consultation.<br><br>We believe all the relevant strategic cross boundary matters have been identified and the most appropriate mechanisms for engagement identified. Our preferred method of engagement would be written exchanges. We have no Comments to make on the South Gloucestershire Local Plan Consultation, but support the overall approach. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Rob Niblett - Gloucestershire County Council (GCC) |
| **Comment ID** | 10757665/1273 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sir/Madam,<br><br>Thank you for Consulting Gloucestershire County Council (GCC) on the South Gloucestershire Local Plan and the Duty to Co-operate and Proposed Approach. I have the following Officer Comments to make:<br><br>**Duty to Co-operate Statement and Proposed Approach – February 2018:**<br><br>**1. Have all relevant potential strategic cross boundary matters been identified?**<br><br>In response to the Government's request for more strategic thinking about transport investment our Local Authorities are currently engaged in discussions to determine options for forming a Sub-National Transport Body. Should this Body be established we will need to collectively work together to identify Strategic Priorities. At the time of writing the following issues will need to be considered within this discussion –<br><br>• The impact of the removal of Tolls using both the Severn Crossings and the likely increase in vehicle movements. The network pinch point at Chepstow (Monmouthshire) and its Air Quality Management Area needs to be considered in terms of likely changes to commuter trip patterns between South Wales, and the Forest of Dean to South Gloucestershire as this journey to work route becomes more financially viable and desirable;<br><br>• The emerging Major Road Network, the role of the A38 in terms of network resilience to the M5 and the importance of mitigating any impacts on the route caused by new development;<br><br>• Despite M5 J14 being located within South Gloucestershire there is a shared need for the Junction to be upgraded to enable the delivery of new development within the Thornbury, Berkeley, Dursley and Wotton-Under-Edge areas. The existing Junction arrangement constrains growth and it is essential we work together with Highways England to resolve this; and |

| | |
|---|---|
| | • Improved rail services between Bristol and Gloucester via MetroWest Phase 2 and the need to work together to investigate new stations between the two cities.<br><br>The main ecological matters are included under 'green infrastructure' however wider than this is the legal matter of carrying out a Habitats Regulations Assessment (HRA) of the Plan which will include looking at potential effects on the Severn Estuary European Marine Site. It is suggested that given the likely quantum and location of the development proposals in the new Local Plan that HRA along with SEA will be cross boundary matters (at least in part). A separate topic of legal compliance [with environmental legislation] therefore needs to be listed somewhere and should include exchanges with Stroud DC as well as perhaps GCC too.<br><br>It is considered that there is a strategic cross-boundary relationship between South Gloucestershire (and other Administrations within the West of England Partnership) on the following subject matters:<br><br>• Mineral provision.<br>• Waste matters (including radioactive waste).<br><br>Gloucestershire County Council and the West of England Partnership are already in the early stages of discussion relating to the preparation of Statement of Common Ground to cover any strategic cross-boundary issues relating to minerals and waste.<br><br>**2. Have we identified the most appropriate engagement mechanisms to encourage constructive, active and ongoing engagement in the development of the Local Plan?**<br><br>Yes, and for the legal issue of HRA/SEA opportunities for written exchanges will probably be sufficient in the main.<br><br>**3. What would be your preferred method of engagement?**<br><br>Written exchanges but other methods may be appropriate if significant matters need addressing or to establish common ground between adjoining Authorities.<br><br>At some stage in the Local Plan process it may be desirable to have a meeting to discuss issues of common interest such as transport and the proposed development in the North of the South Gloucestershire Administrative Area.<br><br>**South Gloucestershire Local Plan:**<br><br>The Consultation Document states that the Local Plan will replace both:<br><br>• South Gloucestershire Core Strategy 2006 - 2027; and the<br>• South Gloucestershire Policies, Sites and Places Plan.<br><br>The Consultation Document does not appear to mention minerals or consider how the Plan would address replacing the adopted Minerals Policies and Site Allocations for South Gloucestershire.<br><br>It is noted that the Policy context for Radioactive Waste will be dealt with within the South Gloucestershire Local Plan and other waste matters are to be dealt with under the Emerging Joint Spatial Plan.<br><br>If you would like to discuss any of the points raised above please do not hesitate to contact me.<br><br>Thank you. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Jane Hennell - The Canal & River Trust |
| **Comment ID** | 19884929/1280 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Thank you for your Consultation on the new Local Plan Consultation Document. The Canal & River Trust have considered the content of the Document and have no Comments to make at this stage. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Trevor Daniels |

| | |
|---|---|
| **Comment ID** | 7916929/1281 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Comments:<br><br>1.This Plan does not show how many houses will be built where and when or the infrastructure needed to service them. Therefore this is a poor Document that is not fit for purpose.<br><br>2. This Document should follow the finalised JSP not predate it.<br><br>3. The Council has agreed to have more houses than it needs to satisfy local needs. Therefore the Plan is going to put an unnecessary strain on infrastructure and cause more pollution and congestion than might otherwise be the case.<br><br>4. The Plan sets out that the area has problems with congestion, pollution because of commuting and the failure of the infrastructure to keep up. The Spatial Strategy proposed i.e. creating different areas where people live and work will just make this worse.<br><br>5. The Plan does not say what transport will be needed to enable the projects in the broad areas listed and does not say that the transport and the services should be put in place before houses are built to prevent further strain on existing services and links.<br><br>6. The Council has not carried out its duty to explain what infrastructure is needed and how this will be paid for. As cuts are being made to MetroBus already it must be clearly spelt out how this will be provided for anyone to have confidence in the Plan.<br><br>7. This Document has a lot of description and only vague Plans that do not flow from the description.<br><br>This 'Plan' needs to be rewritten as a Plan to show what will happen, otherwise it is not worthy of the name Plan. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | The Tortworth Estate Company and St. Modwen Developments Ltd |
| **Comment ID** | 19925633/1282 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | 1 **Introduction:**<br><br>1.1 This Submission is made on behalf of the Tortworth Estate Company and its developer partner, St. Modwen Development Ltd. The Tortworth Estate and St. Modwen are promotors of Buckover Garden Village; one of the Strategic Development Locations identified within the Emerging West of England JSP.<br><br>1.2 The Tortworth Estate and St. Modwen are charged with the responsibility of working with the LPA in delivering the JSP development requirements at Buckover.<br><br>1.3 Since the publication of the JSP Submission Document, the Tortworth Estate and St. Modwen have put significant resources to the planning and delivery of a new Garden Village at Buckover. A comprehensive Design and Delivery Team are working towards the production of a masterplan and Infrastructure Plan.<br><br>1.4 The Tortworth Estate, St. Modwen and their advisers are committed to Buckover being an inclusive environment and to the creation of a community for all generations; designed and delivered on Garden Village principles. The aim is for Buckover to have a flexible design to future proof for tomorrow's needs. Buckover will not just be about housing, but it's about a whole host of ingredients required to create and maintain a thriving community; be it health, employment, education, transport, sport, leisure, food production – and more!<br><br>**2 New Local Plan Strategy for Development:**<br><br>2.1 Past iterations of the South Gloucestershire Development Plan have principally focussed development on large Strategic Sites predominantly around the edges of Bristol, as those locations were interpreted at that time as being the most 'sustainable.'<br><br>2.2 To a large extent, that City focused Strategy ignored the needs of the rural and other communities of the District. Over recent years National Planning Policy has seen a sea-change, recognising how our rural communities can be rather than writing them off as being *unsustainable*1.<br><br>2.3 The Framework is clear at Paragraph 28 that Planning Policies should take a positive approach to sustainable development. This includes promoting the retention and development of local services and community facilities in the rural areas. As such, Paragraph 55 is supportive of the introduction of new housing where it will enhance or maintain the viability of rural communities.<br><br>2.4 With regard to thriving rural communities, the Housing White Paper (February 2017) has set out that the Government expects Local Planning Authorities to identify opportunities for the rural areas to thrive especially where this would support services and help meet the need to provide homes for local people who currently find it hard to live where they grew up. |

| | |
|---|---|
| | 2.5 Through the JSP process, the Tortworth Estate has submitted a sustained case that can be summarised as follows:<br><br>o A continued Strategy solely based on an urban focused reliance of building more homes as bolt-on's to Bristol and the main towns, and a reliance on unlocking difficult Brownfield sites, is considered to be a vulnerable and a high risk Strategy for the delivery of the additional dwellings required within the wider Bristol City Region. Particularly so, if a significant boost in the delivery of new homes is to be achieved.<br><br>o It has been set out by the Estate that the previous focus on "Bristol bolt-on development" has proved lacking and it has been demonstrated that it has left South Gloucestershire Council with 'too many eggs in too few baskets.'<br><br>o Instead, given that the past urban-led Strategy has proved unsuccessful in delivering the levels of housing development required2, the Estate has advocated a more balanced approach. The Estate set out that the Emerging JSP ought to widen the supply and delivery mechanisms and delivery models to ensure housing need is met, and that it is met in a manner that addresses the needs of the wider area of South Gloucestershire.<br><br>1 The Taylor Review of Rural Economy and Affordable Housing.<br>2 Evidenced by the significant backlog against existing Development Plan requirements, and evidenced by South Gloucestershire's 5 year housing supply deficit.<br><br>o Moreover, and fundamentally, the Estate has made the case that the past urban-led Spatial Planning Strategies have significantly failed the rural areas on matters of housing supply and affordability; as well as economic equality, access to jobs and strategic infrastructure investment within the rural areas.<br><br>o It has been demonstrated that the national evidence is such that 'bolt-on' urban extensions often do not result in a 'sustainable' form of development. The Estate has set out the case that, instead, the rural areas should be planned in a manner that they are allowed to escape the "sustainability trap"3 too many communities are caught in. What is required is a Development Plan approach that is based on recognising how our rural communities can be, rather than writing them off as being unsustainable; Plans should address the question "how will development add to or diminish the sustainability of this community" and include social, economic and environmental factors in the answer.<br><br>o The Estate also set out the case that a more dispersed approach to Spatial Planning will avoid the suppression of delivery which is found when competing landowners and outlets are located within close proximity. The Estate has presented the case that the JSP Authorities should accept that rural locations ought to make a strategic contribution to the development needs of the JSP area. The Estate set out that it sees such an approach as a part of a Strategy which will need to be combined with other elements such as Urban regeneration, Urban extensions, Town expansions **and** new settlements. In essence, The Estate called for a new Spatial Strategy that introduces a variety of housing and employment delivery mechanisms and models.<br><br>2.6 The Tortworth Estate and St. Modwen are therefore supportive of the New Local Plan Strategy for Development as set out within Part 2 of the Local Plan Consultation Document (Feb 2018).<br><br>2.7 The Tortworth Estate and St. Modwen support the LPA's proposal that the Emerging Local Plan should contain a Policy for each of the JSP's Strategic Development Locations that cover items listed as 1 to 9 at Page 52 of the Local Plan Consultation Document (Feb 2018). However, as set out within Paragraph 2.41 of the Consultation Document, ongoing discussions will be required between the LPA and Tortworth Estate and St. Modwen, and other Stakeholders, to test, develop and refine the Emerging Policy. The Tortworth Estate and St. Modwen would welcome a continued dialogue on those matters.<br><br>3 The Taylor Review of Rural Economy and Affordable Housing.<br><br>2.8 The Tortworth Estate and St. Modwen support the LPA's approach that individual SDL Policies should set out key elements that are required as part of the delivery of each Strategic Development Location. The Tortworth Estate and St. Modwen concur with the LPA that while the adoption of SPDs are often helpful in the delivery of complex difficult sites in multiple ownership, SPDs may not be necessary where a single landowner controls the site. In such circumstances, it is the Tortworth Estate and St. Modwen's opinion that a focus on producing SPDs would merely result in a distraction of the LPA's finite resources away from the delivery of development and, critically, that distraction could result in unnecessary delays in the completion of much needed new homes and supporting infrastructure.<br><br>2.9 For the same reason, the Tortworth Estate and St. Modwen support the LPA's approach, as set out at Para 2.45, that careful consideration should be given to the best way to bring forward required development to avoid unnecessary Policy hurdles.<br><br>2.10 The Tortworth Estate and St. Modwen support the LPA's approach to undertake further engagement with its communities on the emerging SDLs. The Tortworth Estate and St. Modwen are committed to support that approach.<br><br>2.11 Associated with a detailed Policy to guide the delivery of Buckover, the Tortworth Estate and St. Modwen call upon the LPA to introduce Policy protections to the rural character and openness of the land between the the SDL and Thornbury in order to secure a clear distinction between the settlements of Thornbury and Buckover. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Paul Craig |
| **Comment ID** | 3985185/1298 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | To whom it may concern, |

| | |
|---|---|
| | While there is no doubt that more houses are needed, currently the local infrastructure to support new housing in the Thornbury area does not exist. To pretend that most people of working age living in the area will not be working in Bristol or its fringes is scandalous. The A38 cannot handle the volume of traffic between Thornbury and Almondsbury on the way into Bristol and on the way out the appalling 'improvements' to the Aztec West roundabout mean that traffic can no longer get out either.<br><br>If infrastructure improvements were already in place and SGC Pro-actively worked to ensure a balanced environment then I would not be complaining but it is clear that houses are being shoe horned in with no enhancement in key areas such as the road network.<br><br>What is also clear is that the houses built to date on the edges of Thornbury during recent developments do not conform to standards expected. A pathetic attempt to 'fit in' by rendering properties in a style said to match houses on the High Street does not hide the fact that these soulless shoe boxes have inadequate space for young families to play in their gardens, have inadequate parking in the extreme only one parking space with all houses unless 5 bed!!! With most owners having at least 2 cars and having to use garages to store bikes and extra household belongings. The roads are only 1.5 width with no pavements in places and no front gardens, so no opportunity for further parking in the future. So SGC solution? Buses! I don't think so. The modern flexible work environment means that people cannot and will not conform to limited Public Transport options, so more cars, more blocked streets and more risks of inadequate Emergency Services access.<br><br>SGC needs to look far more strongly at former Brownfield sites rather than expanding small market towns into huge sprawling expanses of shoe boxes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Pat Hinton |
| **Comment ID** | 19780353/1300 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | This Report has been circulated widely in Tockington and we have been invited to make Comments on areas that may be of concern to us.<br><br>I would first of all say that ideally young people should have been encouraged to read and respond to this Document, as it will be these people who will be affected by decisions made now. However, the Report is very lengthy and takes a long time to read and digest and I doubt whether many young people will have the time to do this. I would have thought a shortened, more pithy version could have been prepared which might have garnered a greater response.<br><br>Public Transport is not sufficient to meet the needs of the older population within the rural communities. Bus services to local health providers and Hospitals must be improved.<br><br>The above are just a few thoughts from resident which I hope can be considered. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Peter Day - Oxfordshire County Council |
| **Comment ID** | 15912321/1304 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear ,<br><br>Thank you for Consulting Oxfordshire County Council on the Emerging new South Gloucestershire Local Plan and Duty to Co-operate Statement.<br><br>We have the following Comments to make on the **Local Plan Consultation**:<br><br>1. The Local Plan Prospectus, January 2017 (Paragraph 3.2) stated that the new Local Plan will replace the adopted Core Strategy and Policies, Sites and Places Plan and that the new SGLP will also address any required updating to the Council's Policy Framework for Minerals Planning. We are therefore surprised to see no mention of a Policy for mineral working or supply in the Consultation Document. Furthermore, the Consultation Document is not clear about replacement of the existing Adopted Plans by the new Plan or the inclusion of Policy areas like minerals in the new Plan. We consider it is important that the Core Strategy Minerals Policy CS10 and the Policies, Sites and Places Plan Minerals Policies PSP23, PSP24 and PSP25 are reviewed and, subject to any appropriate updating & amendment, included in this new Plan, to ensure that there is not a Policy gap.<br>2. The 2017 Local Plan Prospectus, January 2017 (Paragraph 2.12) also states that you are not proposing to include Waste Policies in the new Plan, leaving these to be covered by the existing adopted Joint Waste Core Strategy. Again, the future position on Planning Policy for waste is not clear in the Consultation Document. It is important that there is continuation of Planning Policy for waste and therefore the situation should be clarified.<br>3. We support the proposed inclusion of Policies on the Decommissioning of Oldbury Nuclear Power Station and on Radioactive and Hazardous Waste Management and we look forward to further Consultation on proposed Policy wording. We consider it is likely to be more appropriate to have separate Policies for Radioactive and Hazardous Waste, given that there are significant differences in these types of waste and the ways in which they are managed.<br><br>We have the following Responses to the Consultation Questions in your **Duty to Co-operate Statement**: |

| | |
|---|---|
| | 1. We support the inclusion of mineral provision and Decommissioning of the former Power Station at Oldbury as strategic cross boundary matters and do not wish to suggest any others.<br><br>2. The engagement mechanisms that you have identified to encourage constructive, active and on an ongoing engagement in the development of the Local Plan seem appropriate.<br><br>3. Our preferred method of engagement is by written exchange, if necessary, including the preparation of Statements of Common Ground. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Bloor Homes South West |
| **Comment ID** | 20096097/1305 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Please see the attached Document. |
| **Attached documents** | Bloor Homes South West - Turley (Andrew Ross).pdf (316 KB) |

| | |
|---|---|
| **Respondent Name** | Peter Acton |
| **Comment ID** | 16318817/1322 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sir/Madam,<br><br>Please find below my Comments for the above New Local Plan.<br><br>South Glos Council held Local Plan public drop-sessions in March for Hanham; Patchway; Stoke Gifford; Kingswood and Yate. Disappointing that one was not held in Thornbury.<br><br>The Online Document is very user **Unfriendly**. The Questions asked are limited and weighted.<br><br>This Document is long on describing the challenges that South Gloucestershire faces (congestion and pollution through high levels of commuting; failure of infrastructure to keep pace with development etc), but then offers no explanation as to why the Spatial Strategy proposed (creating a separation between where people live and where they work) will do precisely the opposite of alleviating these problems.<br><br>I believe that South Gloucestershire Council is failing in its duty to take the Draft Joint Spatial Plan (JSP) for the West of England and convert this into a Local Authority based Plan to show how, where and when this housing will be delivered, and more importantly what infrastructure will need to be in place in order to deliver it.<br><br>TRAPP'D (Thornbury Residents Against Poorly Planned Development) make reference in its Submission to the New Local Plan on the use the JSP makes on "the Strategic Housing Market Assessment (SHMA) as the basis for its forecast demand. Onto this is added a "market adjustment" (to tilt the balance in favour of supply) to derive an Objectively Assessed Need (OAN) of 97,600 houses for the West of England overall. This compares with a planned build of 105,500, giving a margin for error of 8%. This build is then allocated to each of the four Authorities, of which South Gloucestershire gets 32,500. However, the SHMA forecast is prepared on a Local Authority basis, so we can compare this allocated build target with an OAN for South Gloucestershire of 24,000. This gives an astonishing margin of a 35% excess build over forecast need."<br><br>South Gloucestershire is alone in the four Authorities in not specifying which transport infrastructure projects are a prerequisite for the specified Strategic Development Locations to go ahead. In particular we hear rumours that the MetroBus will not be extending North to Thornbury and the proposed Buckover site. This Authority has a statutory duty to explain what transport and infrastructure it proposes and how this will be funded, which it is clearly failing to do, and to guarantee that these developments will only be allowed if the infrastructure is built first. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Peter D. Box |
| **Comment ID** | 19453441/1323 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **The South Gloucestershire County Council Local Plan Consultation Document**<br><br>**Comments compiled by Peter D. Box BSc, PhD.** |

**1. Timing:**

It seems inappropriate that South Gloucestershire County Council is pursuing its own Consultation so soon after the four County Councils which constitute the West of England conglomerate, namely Bristol, Bath and North East Somerset, North Somerset and South Gloucestershire (SG), have carried out a single public Consultation on their Joint Spatial Plan (JSP). A cynical observer may recall the Danish repetition of the Maastricht Treaty Referendum in order to achieve the result the politicians required.

However, be that as it may, it seems even less appropriate that whilst the Consultation is active organisations which would profit considerably should the Local Plan be adopted are permitted to market their particular proposals as if a decision had already been made.

**2. Figures:**

The JSP was based on an unsubstantiated projection of housing requirements made *circa* 2014. Significantly this was before the UK Referendum on membership of the European Union and hence while the UK was subject to EU Laws on Freedom of Movement. Leaving the EU will, in all probability, lead to less immigration into the UK from EU countries and this could be reflected in a lower than projected housing requirement.

The JSP uses the Strategic Housing Market Assessment (SHMA) as a basis for its forecast to derive an Objectively Assessed Need (OAN) of 97,600 dwellings. The planned build of the JSP is for 105,500 units giving a contingency allowance of 8%. Of the JSP total, 32,500 units were allocated to SG but as the SHMA was prepared on a local Council basis, the figure for SG is available, and gives a corresponding OAN of 24,000. The contingency allowance is therefore an eye-watering 35%. A fairer revision of the figures is called for.

**4. Infrastructure:**

**4.1 General:**

Development of the sites proposed for Thornbury, Charfield and Buckover, require a significant amount of infrastructure to provide residents with the services that they would expect. These cover a very wide range of facilities: Medical, Police, Fire and Ambulance, Schools and Libraries, water and sewage treatments and systems, recycling and waste disposal, shops and supply and probably many more.

All these would not only require a considerable financial resource to set up, particularly at Buckover which is virtually a Greenfield site, but would all add considerably to increased traffic on the road network with resulting negative impact on congestion and pollution.

**4.2 Transport:**

Throughout the JSP continual reference is made to the MetroBus as a solution to transport problems. Some of the references are deliberately vague as, like Thornbury and Buckover, no plans currently exist for routes to service those sites. Even if the vaguely promised MetroBus routes were implemented, could they provide the transport capacity required?

Consider Buckover, the JSP proposes a new Dormitory Town of 3,000 dwellings. This means a population of 10 - 12,000 people of which some 6,000 would initially be adults. Of these at least 5,000 would be in need of employment. Currently there are virtually no jobs at Buckover (one Public House and a medium sized garden centre) and as the nearest towns of Thornbury and Charfield are also scheduled to receive additional housing of 500 and 1,200 units respectively, there is little prospect of all the New Wave Buckoverians finding jobs locally.

Bristol, over 10 miles away, will be the obvious job centre attraction for say 40%, i.e. 2,000 jobs.

MetroBus vehicles will have a passenger capacity no more than a standard double-decker bus, i.e. less than 70. To carry the Buckoverians to work in Bristol will therefore require a fleet of about 30 vehicles, and this will be increased by existing Thornbury commuters (to reduce existing car use) and further to meet the needs of new residents.

That a fleet of around 50 vehicles (plus drivers) would be needed to cope with the demands of this one route alone, illustrates an important conclusion:

**MetroBus is NOT a Mass Transport System.**

Commuters will therefore resort to the use of private cars, and even encouraging car-sharing, the result will be severely increased road congestion and consequent air, soil and water pollution through the Green Belt which the Council is obliged to protect.

**5. Employment:**

| | |
|---|---|
| | The JSP Document identified the three major urban sites within the West of England area as Bristol (pop. 617,280), Bath (pop. 94,782) and Weston-Super-Mare (pop. 84,452). These three form a shallow isosceles triangle with an East-West base of about 50 kilometres (30 miles).<br><br>Considering the employment for the rising population of the area, the JSP identified several Enterprise Zones and Business Parks, all of which were sensibly within or adjacent to, the Bris/Bath/WsM triangle: **i.e. they were nowhere near the major developments proposed for Thornbury, Charfield and Buckover.** Proceeding with these developments is therefore an unsound Policy which should be abandoned forthwith.<br><br>**6. Public Safety:**<br><br>The location of the Buckover development gives rise to considerable concern. The current configuration shows the Estate straddling the A38, a major Trunk Road and the recognised Relief Road for the nearby M5 Motorway. To deliberately choose this site seems grossly irresponsible. With the so-called 'village centre,' with all the associated social centres, Schools, shops, etc right on the main road is courting disaster. It would be expected that residents would very soon be demanding a Bypass to divert through traffic. The only feasible route for such a Bypass would be through the narrow gap designated a 'Green Corridor' between Buckover and Thornbury, thereby reinforcing the urban barrier across the Green Belt.<br><br>**7. Alternatives:**<br><br>**7.1 A Flexible Approach:**<br><br>South Gloucestershire County Council, together with its partners in the West of England Association, should freeze their plans for future housing so far distant in the future. After Brexit has been effected and time given for immigration patterns to stabilise, a new assessment of requirements should be made and revised Plans made accordingly. To rush ahead now and grant Planning Permission for major developments which could not be reversed, would be totally irresponsible. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hanham Community Trust (Land at Hanham Community Centre) |
| **Comment ID** | 19926241/1324 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Please see the attached Document. |
| **Attached documents** | Hanham and Willsbridge Vision Doc lores.pdf (4.8 MB)<br>Hanham Community Trust - Knight Frank LLP (Tom Stanley).pdf (223 KB) |

| | |
|---|---|
| **Respondent Name** | Adrian Edmonds |
| **Comment ID** | 19926305/1337 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **(a) Engagement with Local Councils:**<br><br>Before the next stage of producing the new Local Plan South Gloucestershire should tap into local knowledge in Iron Acton about the significance locally of particular sites and areas, their sustainability, land ownership, historic or ecological value etc. This should be a genuine reaching-out to local people rather than simply general "drop-in" events. This would be consistent with the spirit of the South Gloucestershire Statement of Community Involvement and alert the Authority to issues of particular local sensitivity or concern.<br><br>**(b) M4 Junction 18A:**<br><br>The decision in March 2018 by South Gloucestershire Cabinet Members to recommend the Lyde Green option for the new Junction 18A on the M4 following the public Consultation in 2017 means that Highways England is now in a position to make a firm recommendation to the Department for Transport on its location. The new Junction should include a link to Yate. It would change significantly the relative sustainability of different locations in the Yate/Chipping Sodbury area. This should be taken into account in the new Local Plan and in the Joint Spatial Plan. Failure to do so will undermine both Plans and render them unsound.<br><br>**(c) General Approach Proposed for the Local Plan:**<br><br>I agree that the starting point should be the completion of existing, agreed Core Strategy developments in South Gloucestershire, and that priority should be given to urban renewal and maximising the use of Brownfield land in Yate/Chipping Sodbury in order to minimise loss of Greenfield land. This would include proceeding with the North Yate New Neighbourhood which would provide up to 3,000 new homes for Yate. |

| | |
|---|---|
| | Although it is 12 years since the North Yate New Neighbourhood was agreed nothing has been built. This means that there is no justification for the further proposal for 2,000 homes in the neighbouring North West Yate location. North West Yate should not proceed in the absence of clear evidence that there is a demand for another 4,000 homes in the Yate, Chipping Sodbury and Coalpit Heath area. Over-supply of development sites will simply encourage developers to cherry-pick the easiest ones resulting in a piecemeal approach rather than the "master-planning" South Gloucestershire says it wants.<br><br>I also object strongly to siting the proposed North West Yate development in the Iron Acton Green Belt without demonstrating the "exceptional circumstances" required by National Guidance. No justification is given in the Draft Joint Spatial Plan and it appears that no justification will be given in the new Local Plan. So how will the national requirements be demonstrated? South Gloucestershire should rethink. If it has to identify sites for major new development additional to North Yate they should be in areas close to the new M4 Junction 18A, rather than in Iron Acton (which is separated from it by a railway line, the River Frome and unspoilt Green Belt).<br><br>I understand specifically for example that Planning Permission was recently Refused for an (unobtrusive) car wash at the site of Poplar's Farm, between Frampton Cotterell and Iron Acton on the Bristol Road, on the basis that the land is Green Belt. I do not understand why that would be considered inappropriate development but the building of a significant number of houses and other buildings on nearby Green Belt is being proposed.<br><br>**(d) Design of New Development:**<br><br>I welcome South Gloucestershire's commitment to a "master-planning" approach to strategic developments "in Consultation with local and community interests" and to setting out clearly exactly where it proposes new development should occur. But in villages and other non-urban settlements the design of smaller, non-strategic developments is just as important. This includes paying close attention to the shape, scale and appearance of development to ensure it sits harmoniously within its context. Historic England has pointed out that from Roman times buildings in the West of England have used local stone and other materials giving a characteristic look and feel to our historic settlements. In Iron Acton local pennant stone was the most commonly used material along with oak structural timbers. Even the name, Iron Acton, means village of oak. This "local vernacular" should be reflected in the design of any new developments, large or small, in Iron Acton Parish.<br><br>I do not agree that the proposed North West Yate development, if it goes ahead, should have a "modernist" feel to match the post 1960's housing in Yate. Even though it is referred to as North West Yate it would be effectively a separate neighbourhood in Iron Acton separated from Yate by the industrial areas East of the Yate Road/Armstrong Way roundabout. If it is to go ahead despite the overwhelming opposition of local people it should at least be designed with reference to local historic building traditions so that the existing beautiful pennant stone buildings and walls in the area are not overwhelmed and turned into historical anomalies by a "modernist" aesthetic.<br><br>I share South Gloucestershire's view that no development should be begun without pre-delivery of essential infrastructure. In Iron Acton Parish that would include increasing transport capacity to avoid worsening the existing congestion and lorry blight on the B4058 Wotton/Bristol Road, and B4059 Yate/Latteridge Road.<br><br>This should include a review of Public Transport in the area (noting in particular that the buses which travel down Bristol Road between Yate and Bristol also travel through Iron Acton Village, which does not have suitable roads for increased buses, but yet there would need to be increased Public Transport available should these houses be built). |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Adrian Edmonds |
| **Comment ID** | 19926305/1338 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | SDL - Yate:<br><br>**Urban Localities – Yate:**<br><br>I welcome the proposed "whole town" approach to future planning for Yate but do not support the inclusion of the proposed North West Yate Strategic Development Location in this. In the absence of credible evidence that the Yate/Chipping Sodbury/Coalpit Heath area needs the proposed 50% increase in housing stock (over 20 years, meaning an unprecedented 2.5% average annual population increase), and in the absence of credible evidence that building in the Green Belt is justified and the most sustainable option, the North West Yate proposal should not proceed.<br><br>I support the suggested "Western Gateway" around Yate Railway Station and the aim of more intensive and mixed use of the employment areas within the Parish (in particular the Industrial Estates East of the Yate/Armstrong Road Roundabout). As part of this steps should be taken to reduce the impact of heavy goods traffic on homes on the B4058 Wotton/Bristol Road and the B4059 Yate/Latteridge Road, principally by supporting proposals for the new M4 Junction 18A and encouraging Heavy Goods Vehicles to use that route. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hanham Community Trust (Land at Hanham Sports Ground) |
| **Comment ID** | 20104449/1349 |
| **Document Part Name** | Question 19 Other Comments |

| | |
|---|---|
| **Comment** | Please see the attached Document. |
| **Attached documents** | Hanham and Willsbridge Vision Doc lores.pdf (4.8 MB)<br>Hanham Community Trust - Knight Frank LLP (Tom Stanley).pdf (223 KB) |

| | |
|---|---|
| **Respondent Name** | A. T. Bennett & Sons |
| **Comment ID** | 19926433/1359 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Please see attached Representations. |
| **Attached documents** | A. T. Bennett and Sons - Origin3 (Mr. Alex Cave).pdf (1.0 MB) |

| | |
|---|---|
| **Respondent Name** | Hanham Community Trust (Land North of Abbots Road) |
| **Comment ID** | 20107489/1366 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Please see the attached Document. |
| **Attached documents** | Hanham and Willsbridge Vision Doc lores.pdf (4.8 MB)<br>Hanham Community Trust - Knight Frank LLP (Tom Stanley).pdf (223 KB) |

| | |
|---|---|
| **Respondent Name** | Ms. J. Hillier and Barratt Homes (Bristol) Ltd |
| **Comment ID** | 19740673/1378 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | See attached. |
| **Attached documents** | Ms. J. Hillier and Barratt Homes (Bristol) Ltd - Barton Willmore (Miss. Robyn Nicholl).pdf (792 KB) |

| | |
|---|---|
| **Respondent Name** | IM Land |
| **Comment ID** | 16638625/1398 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | See attached. |
| **Attached documents** | IM Land - Barton Willmore (Miss. Robyn Nicholl).pdf (564 KB)<br>26926 Vision Document 06.pdf (2.2 MB) |

| | |
|---|---|
| **Respondent Name** | ATA Estates (Longwell Green) LLP |
| **Comment ID** | 19740449/1405 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | This Submission relates to the Consultation on the 2018 Sustainable Access Methodology and the associated Sustainable Access Profiles. Separate Representations are being submitted in respect of the Local Plan Consultation Document (February 2018).<br><br>**2018 Sustainable Access Methodology:**<br><br>The Sustainable Access Profiles for the various areas measure walking and cycling distances 'as the crow flies,' rather than using the actual routes that people would travel. This has the effect of making some areas look more sustainable than they are. For example, the Sustainable Access – Village and Settlement Findings (2018) Spreadsheet shows that Hortham Village is within 2km of 11 major employers. While this appears to suggest that the village is a sustainable location, it fails to acknowledge that all of these employers are located in Aztec West which is on the other side of both the M4 and M5 Motorways. The actual walking distance to Aztec West is over 3km and therefore well in excess of the 2km standard.<br><br>In order to remedy this issue walking and cycling distances should be measured using the actual routes that people would travel.<br><br>**Sustainable Access Profile for Longwell Green:**<br><br>Paragraph 3 of the Sustainable Access Profile for Longwell Green states:<br><br>"This Urban Edge location does lack walking and cycling access to a Library, GP Practice and a Dentist." |

| | |
|---|---|
| | The above statement is incorrect. Hanham Health and Cadbury Health Centre are within 1,200m and 1,600m walking distance respectively, while the Longwell Green Dental and Implant Clinic and Hanham Dental Practice are within 850m and 1,400m walking distance respectively. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | ATA Estates (Longwell Green) LLP |
| **Comment ID** | 19740449/1406 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Please see the enclosed Representations in respect of the Local Plan Consultation Document (February 2018). Please note that separate Representations are being submitted in respect of the Consultation on the 2018 Sustainable Access Methodology and the associated Sustainable Access Profiles. |
| **Attached documents** | ATA Estates (Longwell Green) LLP - Walsingham Planning (Mr. Daniel Sharp).pdf (59.8 MB) |

| | |
|---|---|
| **Respondent Name** | Daniel Kelly - South Gloucestershire Liberal Democrat Council Group |
| **Comment ID** | 10311137/1418 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **Part 1:**<br><br>**Pg 6:**<br><br>Under the Heading 1.2 we believe that the wording should be edited to read "… while protecting and enhancing the natural and intrinsic environment." This would better emphasise that this is intrinsic to sustainable development and not just an afterthought that must be balanced against other considerations. Aside from that, we strongly support this Policy on sustainable development, but are not confident that some of the other Policies in the Document conform to it.<br><br>**Pg 7:**<br><br>Under Heading 1.7, we would like to see a commitment that South Gloucestershire Council will provide support and advice to local communities seeking to develop Neighbourhood Plans. Hitherto, a number of Parishes that have attempted to produce Neighbourhood Plans have struggled with producing Technical Planning Documents without expert support from South Gloucestershire Planning Officers. Without such support, the right of communities to produce Neighbourhood Plans is meaningless.<br><br>**Pg 12:**<br><br>Under the Heading "Infrastructure and Services" there should be some mention of the need for better Broadband quality and coverage.<br><br>Under Heading 1.26 we think there should be some mention of mainline rail electrification and that the stations in the MetroWest programme should be identified.<br><br>**Pg 15 – Local Economy:**<br><br>We largely agree with this Section but believe that the Second Bullet Point would also mention the leisure industry and Cribbs Causeway specifically.<br><br>**Pg 16 – Travel Accessibility:**<br><br>We believe that a further key issue should be included: the need to provide a culture change in public attitudes towards the use and value of Public Transport.<br><br>**Pg 17 – Environment, Climate Change and Flood Risk:**<br><br>We believe that a further key issue should be added: the need to make use of new technology to limit unnecessary travel. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Daniel Kelly - South Gloucestershire Liberal Democrat Council Group |

| | |
|---|---|
| **Comment ID** | 10311137/1419 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **Part 2:**<br><br>**Page 22 – Non-strategic Development in the Rest of South Gloucestershire:**<br><br>Paragraph 2.8 states that "rural areas … have not had any planned new housing, over and above infill within existing settlements boundaries, for many years." This is true, but we believe that, thus stated, it gives a very partial view of the situation. We believe that this Paragraph should also acknowledge that there has been significant non-planned development in rural areas, due to speculative Applications and the failure of South Gloucestershire to maintain a five year land supply.<br><br>The grey box on Pg 22 notes that the JSP proposes 500 new houses as a contingency (in Chipping Sodbury) which will be released "only if required." This seems to us to be an open invitation to developers to land-bank in order to get the contingency released. We believe that the Local Plan must state how the Administration intend to avoid such a scenario.<br><br>**Pg 26 – Why is a Change of Approach Needed?**<br><br>Under the Bullet Point of Paragraph 2.18 we believe it should be emphasised that there is a need to bring down the cost of Public Transport and to bring employment closer to where people live. Failure to do so will mean that those on low incomes or without jobs will struggle to be able to take advantage of new employment opportunities.<br><br>**Pg 29 – What are the Advantages of this Approach?**<br><br>2.24 – We agree with the sentiment of Bullet Point Four, but we believe that it should state that improvements in Public Transport will require the use of segregated lanes and that reducing the need for travel will require employers embracing new technology to allow staff to work remotely.<br><br>**Pg 50 – Strategic Development Locations:**<br><br>Paragraph 2.31 – as stated above, we believe that the contingency at Chipping Sodbury to be released in the absence of a five year land supply is an invitation for developers to land-bank, which is precisely what the Local Plan is supposed to be putting a stop to.<br><br>**Pg 52:**<br><br>2.40 It is important that the Policies for the SDLs safeguard land for sustainable transport links and green infrastructure and makes their provision a requirement of the development. For example, we would like to see the route of the Old Frog Lane Colliery Railway turned into a path for pedestrians, cyclists and horse riders, providing a link into the Yate Spur Cycle Path and via that to the Bristol Bath Railway Path. If following the Joint Spatial Plan Inquiry any of these sites are not taken ahead, we would still want the land safeguarded for this use in a Policy in the Local Plan.<br><br>2.42 We believe that Parish Councils should be added to the list of key partners.<br><br>**Pg 56 – What Does Non-strategic Mean?**<br><br>2.50 - We believe that 499 houses is too large for an upper limit for non-strategic developments in any instance, and that Policies should be put in place to set a lower upper limit. In rural settings, in particular, a development of that size could destroy the character of an existing community and put unsustainable pressure on infrastructure.<br><br>2.51 – We believe that the scale of existing settlements should not be the main factor in determining the scale of non-strategic growth. Settlements that have already seen significant recent development may be less appropriate as development locations in many cases than small settlements that are in need of some Affordable Housing in order to survive as communities. It will depend, in each case, on the circumstances and needs of each settlement, including the cumulative levels of recent development. Growth should not be allocated by a simple formula.<br><br>We believe that non-strategic development should be distributed as widely as possible throughout South Gloucestershire, so that existing communities are better able to absorb the scale of new development.<br><br>We believe that Policies should be put in place to ensure that, in each case, non-strategic developments are built out over the lifetime of the Plan, and not more rapidly. This slower pace of building out will allow communities to adapt more easily to new housing, and also allow small developers and Self Build schemes to compete with larger developers for non-strategic schemes.<br><br>**Pg 57 – Non-strategic Housing Lower Limit:** |

| | |
|---|---|
| | Paragraphs 2.53 - 2.54 indicates that 10 houses is the "lower limit" for a non-strategic level of growth and that smaller sites can be suggested for rural settings, but will not count as non-strategic growth. We believe that all development in rural settings should count towards non-strategic growth numbers, with no lower limit.<br><br>**Pg 64:**<br><br>The Green Belt Section identified under Key 7 is actually in Westerleigh Parish, not Frampton Cotterell. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Fear Group |
| **Comment ID** | 19927745/1422 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sir/Madam,<br><br>South Gloucestershire Local Plan Consultation Document (February 2018):<br><br>We are writing to set out Comments on the Local Plan Consultation Document on behalf of Fear Group, who have ownership and development interests in land fronting Bath Road and Brewery Road in Bitton. The Comments relate to the Local Plan Consultation Document Question 3 (Non-Strategic Development) and the Part 3 Policy Discussion Points, including Question 8 (Extra Care Housing), Question 9 (Affordable Housing) and Question 12 (Parking Standards including Electric Vehicle Charging Points).<br><br>**Question 3 – Non-Strategic Development:**<br><br>Our Comments are set out here within the context of the need for Non-Strategic Development (NSD) sites to provide 1,300 new homes plus an additional contingency of 500 new homes.<br><br>**Policy Discussion Points - General:**<br><br>We note that that the proposed strategic Policies include a Residential Development heading which will replace current Core Strategy Policies CS5 and CS15 on the location of development and the distribution of housing respectively. A range of specific Policy discussion points A to O are then set out. The current Core Strategy Policy CS16 covers housing diversity and whilst we imagine this topic will be included within the new Local Plan it does not appear to feature in the Consultation Document. We therefore request that as the new Local Plan is developed it includes provision on ensuring an adequate range of housing types to meet needs, as required by the NPPF. This should include provision of homes for older people, including those in need of care support.<br><br>**Policy Discussion Points - General:**<br><br>We note that that the proposed strategic Policies include a Residential Development heading which will replace current Core Strategy Policies CS5 and CS15 on the location of development and the distribution of housing respectively. A range of specific Policy discussion points A to O are then set out. The current Core Strategy Policy CS16 covers housing diversity and whilst we imagine this topic will be included within the new Local Plan it does not appear to feature in the Consultation Document. We therefore request that as the new Local Plan is developed it includes provision on ensuring an adequate range of housing types to meet needs, as required by the NPPF. This should include provision of homes for older people, including those in need of care support.<br><br>In parallel with these Representations on the Local Plan Consultation Document, we are also submitting a Call for Sites Form in respect of the Land at Bath Road/Brewery Hill, Bitton.<br><br>We would be grateful if you could keep us informed of progress with the new Local Plan and please feel free to get in touch if you require any further information in respect to the Comments set out here or the information in the Call for Sites Form. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Taylor Wimpey |
| **Comment ID** | 20128769/1434 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Please see the attached Document. |
| **Attached documents** | Taylor Wimpey - Turley (Claire Hawkes).pdf (5.4 MB) |

| | |
|---|---|
| **Respondent Name** | Daniel Kelly - South Gloucestershire Liberal Democrat Council Group |

| | |
|---|---|
| **Comment ID** | 10311137/1450 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **Appendix 3 - Green Belt and AONB:**<br><br>**Tormarton Park & Share Site:**<br><br>There has been a long term aspiration for a Park & Share Site at A46/M4/J18. There is no mention of this in the Local Plan Consultation Document. Three positive Feasibility Studies have been conducted by the Council. It has been suggested that there might be a change to the Green Belt to allow for this. We can see no reason for any adjustment to the Green Belt for this to happen. The proposed site is covered by Green Belt and the Cotswolds Area of Outstanding Natural Beauty. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Daniel Kelly - South Gloucestershire Liberal Democrat Council Group |
| **Comment ID** | 10311137/1452 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **Introduction:**<br><br>**Pg 3:**<br><br>We agree with the sentiment in favour of Plan-led development expressed in this Introduction, but as a Council, we have always attempted to work in this way, but have been defeated by speculative developments as a result of developer land-banking. This Introduction correctly identifies the absence of a five year land supply as a problem that needs to be addressed, but it does not identify how this new Plan will succeed in tackling this when previous attempts have failed. We believe more information should be provided on why the Administration believe that this new Plan will be different.<br><br>**Pg 4:**<br><br>We would suggest the First Bullet Point here is amended so that it reads "… where people want and are able to live, work and invest by choice." It is vital that the Local Plan concentrates on providing homes that are affordable, as well as desirable.<br><br>We believe that there should be additional Bullet Points in this Outline Vision for the Local Plan covering: a) Heath and Health Inequalities; and b) the Council's responsibility to ameliorate and adapt to Climate Change. Although these issues are mentioned elsewhere in the Document we believe that they are of such significance that they should be emphasised in this introductory statement.<br><br>**Pg 5:**<br><br>Under the Heading "Part 2" the Consultation Document proposes a tripartite categorisation of development: urban, Strategic Development Locations (SDL), and non-strategic development in rural locations. Our opposition to the selected SDL locations has been set out at length in our Response to the Joint Strategic Plan Consultation so we do not intend to repeat it here. Leaving that to one side, we are concerned that, as it stands, the wording of this Section does not give much indication as to what kind of communities the Plan envisages the SDLs becoming once they are built out. Most of the SDLs are currently in rural settings but does the Plan envisage them becoming urban, remaining rural, or something in between? We believe that the Local Plan should make the Administration's eventual Vision for these settlements clearer. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ian Knipe |
| **Comment ID** | 20133153/1456 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Please see the attached Document. |
| **Attached documents** | Mr. Ian Knipe - Turley (Jeff Richards).pdf (7.0 MB) |

| | |
|---|---|
| **Respondent Name** | Mr. Mike Kerton - Bloor Homes South West and Mr. Jeremy Sutcliffe - Baratt |
| **Comment ID** | 16646593/1468 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Please see attached Representations. |
| **Attached documents** | Bloor Homes South West (Mr. Mike Kerton) and Barratt (Mr. Jeremy Sutcliffe) - Barton Willmore.pdf (14.6 MB) |

| | |
|---|---|
| **Respondent Name** | Rebecca Thompson - Wallace Land Investments |
| **Comment ID** | 19935809/1471 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sir/Madam,<br><br>**SOUTH GLOUCESTERSHIRE LOCAL PLAN CONSULTATION**<br><br>**Introduction:**<br><br>Wallace Land Investments (''Wallace'') specialise in the promotion and subsequent delivery of strategic land for residential and mixed use development across England and Scotland. These schemes range from 50 to 2,500 new homes and involve a mixture of uses such as employment land and community facilities and infrastructure. From this experience Wallace understands the need for Local Plans to deliver the right amount of homes and jobs in the right locations in aid of facilitating thriving but sustainable local places the country needs. To do this, every effort should be made to objectively identify and meet the full housing and economic needs of an area, whilst responding positively to the wider opportunities for growth.<br><br>This Submission provides Wallace's Representations to the South Gloucestershire Local Plan Consultation.<br><br>**Conclusions:**<br><br>Wallace appreciate the opportunity to assist the Council in informing the next stages of the South Gloucestershire Local Plan. Wallace will submit further Comments on detailed wording of Draft Policies during the Council's next Consultation and would welcome the opportunity to partake in the Local Plan Examination in due course. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Reginald Pearce |
| **Comment ID** | 19740929/1484 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **Overview and Context:**<br><br>Alder King Planning Consultants fully supports the identification of Thornbury as a strategic growth location within the Emerging Joint Spatial Plan (JSP). Thornbury is an established and thriving Market Town and is recognised within South Gloucestershire Council's own Evidence Base (Rural Settlements and Villages Topic Paper (November 2015) as one of the two most sustainable locations offering non-Green Belt potential. It is acknowledged that South Gloucestershire Council's Core Strategy has already established that, in the Plan Period and beyond, Thornbury will be a thriving and socially cohesive Market Town. This is also recognised in the new South Gloucestershire Local Plan.<br><br>We understand that the constraints within the West of England, notably Green Belt, make it difficult to release non-allocated sites during the Plan Period to respond to any shortfalls in delivery. As such we encourage a positive approach to housing land supply through the allocation of additional sites as this would ensure any issues within delivery of the Strategic Development Locations (SDLs) can be addressed expediently without reliance on a Local Plan Review. That said, the land put forward as part of these Representations should be considered in order to support future growth in Thornbury.<br><br>The land put forward as part of these Representations, is located to the East of Thornbury and to the West of Buckover. The land lies adjacent to Hacket Hill and A38 along its Eastern boundary and Whitewall Lane and Clay Lane on its Northern and Western boundaries (see enclosed Site Plan).<br><br>We are supportive of further growth at Thornbury as an SDL and in the first instance consider that the land, or part thereof, is appropriately located to assist with the delivery of the Thornbury SDL. We also understood that the intention is, subject to being confirmed through the JSP, that the release of contingency sites will also be considered through the process of Plan Review, conducted every 5 years following adoption. Therefore it is also acknowledged that this land could assist as contingency land, well related to the Thornbury SDL.<br><br>In addition to the land's role as either forming part of the Thornbury SDL or providing additional contingency, those parts of it that relate well to the existing settlement could also be utilised for non-strategic growth. It is on this basis that the Representation continues below. |
| **Attached documents** | Reginald Pearce - Alder King Planning Consultants (Mr. Mark Cullen).pdf (112 KB) |

| | |
|---|---|
| **Respondent Name** | Jeremy White |
| **Comment ID** | 19936257/1503 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | To whoever it may concern,<br><br>I am writing this email to explain why I object to the possible development of sites in the greater Hanham area.<br><br>My name is Jeremy White and I live at . Our home is within the Hanham Abbots Conservation Area which is beautiful and well worth maintaining for future generations. |

| | |
|---|---|
| | I am a member of 'Hanham Green Belt Conservation Society.' I am also a member of the recently formed 'Keep Hanham Abbots Special.' Both these Groups are vibrant and work hard to maintain the character and history of the local environment.<br><br>I have lived in  for  years and moved to this area because of its outstanding community resources and the quality of life these resources can facilitate.<br><br>I own two dogs and walk miles each day in the locality. This area has many public footpaths which traverse the Hanham Hills and the Avon Valley. I have met many people through this activity and I know how highly these green areas are valued.<br><br>They are in effect a 'green lung' for many local people and provide walks through historic countryside. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Berni O'Mahony |
| **Comment ID** | 10194497/1523 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **Subject: In Response to the South Glos Council Local Plan Consultation**<br><br>In response to the South Glos Council Local Plan Consultation:<br><br>I support the views and Reports submitted by:<br><br>• Hanham District Green Belt Conservation Society<br>• Keep Hanham Abbots Special Group<br>• Hanham Abbots Parish Council<br><br>My laptop has failed therefore I'm unable to submit the more detailed Response I had hoped to but please do not consider that the briefness of this Response shows any of interest or dedication to the Plans in progress.<br><br>I am a member of two local volunteer groups - Hanham District Green Belt Conservation Society and Keep Hanham Abbots Special - that are passionate about the Hanham Green Spaces and Conservation Area as well as its historic assets and amazing wildlife. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | The Engine Common Trustees (ECT) |
| **Comment ID** | 19741409/1556 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sirs,<br><br>SOUTH GLOUCESTERSHIRE NEW LOCAL PLAN: CONSULTATION DRAFT (FEBRUARY 2018):<br><br>We refer to the public Consultation exercise in respect of the above Document and now write in response to same. These Representations are made on behalf of our Clients The Engine Common Trustees (ECT); Mr. M. S. Howes; Rockfield Farms Limited (RFL); Downend Estates Limited (DEL).<br><br>There are also separate Responses on behalf of these Clients to the simultaneous Call for Sites and Local Green Spaces Consultations being undertaken by the Council.<br><br>Context:<br><br>These Representations are made against the context of other material Planning considerations, most significantly the Emerging Joint Spatial Plan (JSP) that is being prepared by the West of England Councils including, of course, South Gloucestershire Council. This has recently been submitted to the Secretary of State and is expected to go forward to Examination later in the year.<br><br>There will be considerable debate about the overall quantum of the OAHN and its distribution within the Districts. The identification of both specific Strategic Development Locations (SDLs) and as yet undefined Non-Strategic Development (NSD) form an important part of future housing provision. We have put forward Representations in response to the JSP regarding the need for a greater level of housing provision over the Plan Period; and also support in principle for SDLs and NSD. ln this respect we consider the scale for each, particularly the latter, will need to be increased. |

| | |
|---|---|
| | The Responses to this Consultation are inevitably driven by the nature of the Questions posed by the Council; regard also needs to be had for the ongoing JSP process and Representations made in that context. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | M. S. Howes |
| **Comment ID** | 19741377/1567 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sirs,<br><br>SOUTH GLOUCESTERSHIRE NEW LOCAL PLAN: CONSULTATION DRAFT (FEBRUARY 2018):<br><br>We refer to the public Consultation exercise in respect of the above Document and now write in response to same. These Representations are made on behalf of our Clients The Engine Common Trustees (ECT); Mr. M. S. Howes; Rockfield Farms Limited (RFL); Downend Estates Limited (DEL).<br><br>There are also separate Responses on behalf of these Clients to the simultaneous Call for Sites and Local Green Spaces Consultations being undertaken by the Council.<br><br>Context:<br><br>These Representations are made against the context of other material Planning considerations, most significantly the Emerging Joint Spatial Plan (JSP) that is being prepared by the West of England Councils including, of course, South Gloucestershire Council. This has recently been submitted to the Secretary of State and is expected to go forward to Examination later in the year.<br><br>There will be considerable debate about the overall quantum of the OAHN and its distribution within the Districts. The identification of both specific Strategic Development Locations (SDLs) and as yet undefined Non-Strategic Development (NSD) form an important part of future housing provision. We have put forward Representations in response to the JSP regarding the need for a greater level of housing provision over the Plan Period; and also support in principle for SDLs and NSD. ln this respect we consider the scale for each, particularly the latter, will need to be increased.<br><br>The Responses to this Consultation are inevitably driven by the nature of the Questions posed by the Council; regard also needs to be had for the ongoing JSP process and Representations made in that context. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Rockfield Farms Limited (RFL) |
| **Comment ID** | 20069217/1581 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sirs,<br><br>SOUTH GLOUCESTERSHIRE NEW LOCAL PLAN: CONSULTATION DRAFT (FEBRUARY 2018):<br><br>We refer to the public Consultation exercise in respect of the above Document and now write in response to same. These Representations are made on behalf of our Clients The Engine Common Trustees (ECT); Mr. M. S. Howes; Rockfield Farms Limited (RFL); Downend Estates Limited (DEL).<br><br>There are also separate Responses on behalf of these Clients to the simultaneous Call for Sites and Local Green Spaces Consultations being undertaken by the Council.<br><br>Context:<br><br>These Representations are made against the context of other material Planning considerations, most significantly the Emerging Joint Spatial Plan (JSP) that is being prepared by the West of England Councils including, of course, South Gloucestershire Council. This has recently been submitted to the Secretary of State and is expected to go forward to Examination later in the year.<br><br>There will be considerable debate about the overall quantum of the OAHN and its distribution within the Districts. The identification of both specific Strategic Development Locations (SDLs) and as yet undefined Non-Strategic Development (NSD) form an important part of future housing provision. We have put forward Representations in response to the JSP regarding the need for a greater level of housing provision over the Plan Period; and also support in principle for SDLs and NSD. ln this respect we consider the scale for each, particularly the latter, will need to be increased.<br><br>The Responses to this Consultation are inevitably driven by the nature of the Questions posed by the Council; regard also needs to be had for the ongoing JSP process and Representations made in that context. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Downend Estates Limited (DEL) |

| | |
|---|---|
| **Comment ID** | 1463137/1592 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sirs,<br><br>SOUTH GLOUCESTERSHIRE NEW LOCAL PLAN: CONSULTATION DRAFT (FEBRUARY 2018):<br><br>We refer to the public Consultation exercise in respect of the above Document and now write in response to same. These Representations are made on behalf of our Clients The Engine Common Trustees (ECT); Mr. M. S. Howes; Rockfield Farms Limited (RFL); Downend Estates Limited (DEL).<br><br>There are also separate Responses on behalf of these Clients to the simultaneous Call for Sites and Local Green Spaces Consultations being undertaken by the Council.<br><br>Context:<br><br>These Representations are made against the context of other material Planning considerations, most significantly the Emerging Joint Spatial Plan (JSP) that is being prepared by the West of England Councils including, of course, South Gloucestershire Council. This has recently been submitted to the Secretary of State and is expected to go forward to Examination later in the year.<br><br>There will be considerable debate about the overall quantum of the OAHN and its distribution within the Districts. The identification of both specific Strategic Development Locations (SDLs) and as yet undefined Non-Strategic Development (NSD) form an important part of future housing provision. We have put forward Representations in response to the JSP regarding the need for a greater level of housing provision over the Plan Period; and also support in principle for SDLs and NSD. ln this respect we consider the scale for each, particularly the latter, will need to be increased.<br><br>The Responses to this Consultation are inevitably driven by the nature of the Questions posed by the Council; regard also needs to be had for the ongoing JSP process and Representations made in that context. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hannah Saunders - Dodington Parish Council |
| **Comment ID** | 19931969/1625 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **OTHER – FOLLOWING ATTENDANCE AT WORKSHOP/BRIEFING SESSION (RIDGEWOOD CENTRE, CHIPPING SODBURY) AND READING OF NASH REPORT…. THE FOLLOWING DETAILED COMMENTS HAVE BEEN DRAWN UP BY MEMBERS OF DODINGTON PARISH COUNCIL:-**<br><br>(Note – the term "Yate/Sodbury" is used here to reflect postal geographic areas, in line with much of the South Gloucestershire Documentation. The Parish of Dodington covers much of South West Yate and Western Chipping Sodbury, as well as a large rural area to the South of the railway. Consequently Dodington is a major part of "Yate/Sodbury")<br><br>Employment opportunities in different locations in South Gloucestershire are linked to three key factors:<br><br>o Distance to areas of employment – If local employment is generally low-paid, an area will have a pre-dominance of lower-skilled people living there.<br><br>o Transport links, public and private – long travel times are a significant deterrent to.<br><br>o Cost of travel to employment – costly Public Transport is a deterrent to low-paid people seeking employment outside their immediate area.<br><br>The Yate/Sodbury conurbation has generally poor and expensive connections to key employment areas such as Emersons Green, the North Fringe and Central Bristol. This results in the lower ambitions, Qualification levels and employment associated with Yate/Sodbury compared to Emersons Green and Harry Stoke, for example. The NASH Report clearly identifies this point.<br><br>Another point drawn out in the NASH Report is the high level of car dependence in Yate/Sodbury. This results in significant traffic congestion, increasing travel times and affecting public health. This is likely to worsen significantly with the large amount of housing planned for North Yate. If the M4 Junction 18A is built without proper link roads to South West and North West Yate, country roads and the South Yate Estates will attract major additional traffic.<br><br>Concentrating housing in areas such as Yate without encouraging higher-skilled employment – and good access to education and training facilities – will only exacerbate this divide. The Local Plan does little to tackle this deficit in the Yate/Sodbury area.<br><br>There needs to be a flexible and economic Public Transport system linking to employment areas. As well as commuting out of Yate/Sodbury, the Policy also needs to take into account the role of Yate as a shopping and employment destination. A major "two-way" Park and Ride site is needed with links to Bristol, to the MetroBus system and inbound to Yate. This is an urgent priority, to be followed by an extension of the MetroBus system to Yate. Links to Yate Station need to be improved along with station upgrades.<br><br>The slow rate of expansion of the Cycleway Network has hindered the growth of cycle commuting in and from Yate/Sodbury. It should be a priority to complete the Yate Spur to the Bristol and Bath Railway Path and to establish a route from Yate to the North Fringe Cycleway Network that starts in Winterbourne and continues to Bristol Parkway and Stoke Gifford. |

| | |
|---|---|
| | North Yate and to some extent Chipping Sodbury have a Public Transport deficit, particularly at off-peak times. This encourages reliance on cars and makes the traffic situation worse.<br><br>A lot of Heavy Goods Vehicles travel through the Yate/Sodbury area, but there are no secure public HGV parking areas. HGV parking is common in certain residential areas. The Local Plan should identify a suitable location for a secure public lorry park.<br><br>In short, we urge that infrastructure and employment investment should be accelerated, rather than trailing behind housing as has so often happened in the past. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hannah Saunders - Dodington Parish Council |
| **Comment ID** | 19931969/1626 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **OTHER – SPEAKING WITH JOINT CYCLEWAYS GROUP – THE FOLLOWING COMMENT IS INCLUDED:**<br><br>It is important that the Policies for the SDLs safeguard land for sustainable transport links and green infrastructure and makes their provision a requirement of the development.<br><br>For example, we would like to see the route of the Old Frog Lane Colliery Railway turned into a path for pedestrians, cyclists and horse riders, providing a link into the Yate Spur Cycle Path and via that to the Bristol-Bath Railway Path.<br><br>If following the Joint Spatial Plan Inquiry any of these sites are not taken ahead, we would still want the land safeguarded for this use in a Policy in the Local Plan. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Taylor Wimpey |
| **Comment ID** | 20068353/1639 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sir/Madam,<br><br>**NEW SOUTH GLOUCESTERSHIRE LOCAL PLAN CONSULTATION DOCUMENT – RESPONSE ON BEHALF OF TAYLOR WIMPEY REGARDING LAND AT MANGOTSFIELD:**<br><br>On behalf of our Client Taylor Wimpey we are instructed to provide a Response to the Consultation on the New South Gloucestershire Local Plan Consultation Document. Taylor Wimpey is one of the largest providers of new homes in England and has interests in a variety of sites and locations within South Gloucestershire. This Response has been prepared in respect of land Taylor Wimpey have interests in at Mangotsfield to the North East of Bristol within the Administrative Area of South Gloucestershire.<br><br>The land at Mangotsfield currently falls within the Green Belt. It is our view, however, that this area does not truly perform any of the statutory functions of Green Belt given that it now has built development on three sides and is separated from open countryside at the East by the A4174. We therefore consider this site to be an appropriate location for residential development following non-strategic release of Green Belt land through the Emerging Local Plan.<br><br>For clarity, Taylor Wimpey's land interests include that identified on the Site Location Plan at **Appendix 1**. The land is owned freehold by Taylor Wimpey, is modest in size (approximately 5.5ha) and capable of accommodating approximately 180 units; the area is not, therefore, considered a Strategic Site.<br><br>Set out below are Responses on behalf of our Client, Taylor Wimpey, to the Questions within the current Consultation version of the new Local Plan. Not all Questions are answered but we would like to retain the opportunity to Comment on wider topics if relevant when the opportunity arises later in the Local Plan process. Additional Comments are also included below on other aspects of the Consultation Document, and background evidence where appropriate.<br><br>In addition to this letter of Representation to the new Local Plan Consultation, please also find enclosed a Response Form to the concurrent Consultation on proposed Local Green Spaces, a further letter of Representation relating to this concurrent Consultation, and a Completed Call for Sites Form in relation to the proposed allocation of Land at Mangotsfield for residential development in the new Local Plan.<br><br>**Comments on the Key Issues and Priorities:**<br><br>Part 1 of the Draft new Local Plan sets out various Key Issues and associated Priorities for the new Local Plan, these issues are set out in the following categories:<br><br>o Population and Housing; |

| | |
|---|---|
| | o Local Economy;<br><br>o Infrastructure and Service Provision;<br><br>o Travel Accessibility; and<br><br>o Environment, Climate Change and Flood Risk.<br><br>Although we do not object to any of the above Topics being Priorities for the Plan we would like to request that further, robust justification is provided to demonstrate why these specific objectives have been chosen and how the new Local Plan will achieve them. For example, on Page 14 of the Consultation Document the following is set out as a Priority for the new Plan: '… T*o identify land for new housing to meet the housing requirement set out in the JSP.*' For reasons set out below we disagree with the level of housing as currently proposed in the JSP given that it does not reflect the OAN for the Plan area, nevertheless in principle this Priority would be appropriate, so long as the JSP does fully reflect the full OAN for South Gloucestershire.<br><br>In addition to planning for sufficient housing to meet the actual OAN for the District, we consider that any aspiration or objective set out in the new Local Plan with regards to housing delivery should be based on a 'minimum' or an 'at least' figure, and that sufficient additional housing sites need to be identified to ensure that any adopted housing figure is met. This needs to be over and above the small amount of contingency sites identified elsewhere in the Draft Plan. In line with the requirements of the NPPF, and PPG, the Council need to ensure it plans positively to ensure housing needs are met. This is of particular importance to South Gloucestershire, an Authority that has failed to deliver sufficient housing to meet their adopted housing land supply requirement for some years.<br><br>We consider that the production of a new Local Plan should be seen by the Council as an opportunity to address a historic failure to maintain a housing land supply and to seek to deliver sufficient housing to meet the OAN in a proactive manner by planning for sufficient sites to ensure that at least the adopted housing requirement is delivered.<br><br>We also consider it important that, although not 'Policies' per se, that the Key Issues and Priorities should not be included in the Plan if they merely communicate vague and imprecise aspirations. We request that at subsequent stages of the Local Plan these 'Priorities' are more clearly defined and specifically linked to subsequent Policies to demonstrate the Policy mechanism for achieving these aims.<br><br>**Comments on Non-Strategic Development in South Gloucestershire (Paras 2.47 – 2.72):**<br><br>Paragraphs 2.5 – 2.9 of the Consultation Document set out that the new Local Plan will deliver 32,500 new homes in South Gloucestershire in line with the figures for the additional level of Housing Growth proposed for South Gloucestershire in the Emerging West of England JSP.<br><br>We have serious concerns regarding the Methodology and Evidence Base used to determine the proposed level of housing growth currently identified in the JSP Publication Document. On behalf of Taylor Wimpey, Representations to the JSP have been prepared to object to the suppressed housing requirement currently proposed. Taylor Wimpey is part of a Consortium of key interested parties that have collaborated to provide a detailed Response to the JSP. This combined Response (prepared by Barton Wilmore and submitted separately by them as part of the recent JSP Consultation) includes a Technical Report that considers the full Objectively Assessed Housing Need for the West of England and provides an update to previous modelling assumption based on the latest available data. The conclusion of this Report, in relation to housing numbers, is that the JSP needs to plan for at least 140,000 dwellings over the Plan Period to 2036 rather than the 105,500 currently suggested.<br><br>With regard to the South Gloucestershire New Local Plan Consultation Document, we consider it essential that this makes provision for an appropriate level of housing growth to be delivered across the Plan Period. Whilst the Local Plan must conform with the JSP, this Plan is yet to be examined and it is our view that the housing requirement will need to be substantially increased. Consequently, the level of 'non-strategic' housing growth planned for in the new Local Plan should not be limited to 1,300 units at this stage. Even with the proposed potential contingency of 500 additional units which will be considered for release through the process of the 5 yearly Plan Reviews, it is considered that this level of planned delivery is insufficient to ensure the OAHN of the District will be met and should be increased.<br><br>We consider that the level of non-strategic growth planned for in the Emerging Plan should be reflective of the true Objectively Assessed Housing Need (OAHN) for the District and not based on the suppressed housing number currently proposed in the Emerging JSP.<br><br>We support the recognition that taking a combined approach to identifying sources of housing supply (from both large Strategic Sites and more dispersed development of a range of scales) allows the benefits of growth to be distributed more widely, as indicated in the final Bullet Point of Paragraph 2.49.<br><br>**Summary:**<br><br>To meet the residual (non-strategic) residential development requirements of the Emerging West of England Joint Spatial Plan (JSP) further Green Belt land will need to be released within South Gloucestershire.<br><br>Overall, we are in general support for Option 3 as the preferred Strategy for accommodating Non-Strategy Growth within the District both Inside and Outside of the Green Belt. In particular, we support additional growth at Mangotsfield to the East of Bristol, albeit the delivery targets must be set against a robustly assessed housing need for the WoE area and not against the suppressed housing requirement currently proposed. Additional sites need to be identified to ensure that the District has a realistic chance of maintaining a housing land supply. The potential for further Green Belt release should not be ruled out at this stage without proper sustainability testing and suitable sites in sustainable locations, such as this site at Mangotsfield, should be considered as a potential location capable of accommodating growth in the next version of the new Local Plan. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sarah O'Driscoll - Bristol City Council |

| | |
|---|---|
| **Comment ID** | 8950785/1644 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Response from Bristol City Council:<br><br>Bristol City Council welcomes the opportunity to consider proposals for the South Gloucestershire Local Plan. It is noted that the Document aims to bring forward the proposals set out in the Emerging Joint Spatial Plan in the context of the new Local Plan for South Gloucestershire. The City Council has no specific Comments at this stage and looks forward to considering and engaging with future stages of Plan preparation.<br><br>South Gloucestershire Council is thanked for its recent Response to the similar Consultation on the Bristol Local Plan. These Comments will be taken into account in preparing the next stage of the Review. A number of important cross boundary matters were identified and the City Council looks forward to considering these matters further with South Gloucestershire Council both in the context of the Local Plans and other Plans and Strategies. It is suggested that Officers meet in the near future to discuss these topics. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Phil Larter - Leicestershire County Council |
| **Comment ID** | 19778785/1646 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sir/Madam,<br><br>Thank you for Consulting Leicestershire County Council on your new Local Plan and associated Duty to Co-operate Statement. At this juncture the County Council has no detailed Comments to make on the Consultation but wishes to confirm that its preferred method of engagement to be email (and links through to the appropriate webpages). |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | S. K. Sears |
| **Comment ID** | 6141921/1654 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | The following are my initial Responses to your latest version.<br><br>Do not agree that a very narrow separation area/strip separates Buckover Garden Village, might even add city from Thornbury. The new village lacks innovative design, energy conservation, provision of jobs to support the community and therefore does not meet the criteria set out by the national Government. It also just emphasises how remote the centre of Thornbury is.<br><br>Transport links are not thought out or specified in a suitable manner; is the super bus the same as the MetroBus.<br><br>Why when travelling North on the A38 one has greater priority to continue on that road rather than access the M5 Motorway?<br><br>Affordable Housing is nowhere near attempting to provide homes utilising alternatives to the current breeze block cladding and concrete structures provided currently by the national developers in this location. They provide at best a nod to green issues. Flood Plains appear to have variations and do the attenuation chambers conserve water use, absolutely not.<br><br>Specifically in Thornbury at least 20% of commercial units are vacant, existing commercial units have been transposed into elderly care homes and offices have applied for Change of Use to become flats, so.. Why are two large chunks of green fields being classed as new industrial design whatever for more commercial use? When I asked the question what industries, innovative design, venture, etc, could be attracted here, clearly no research had been conducted as no logical answer was forthcoming. I could conclude that when the new Nuclear Energy Station occurs then perhaps for the build and construction there would be a huge temporary influx for residential living. However Thornbury is likely to remain as it has been for many years a Commuter Belt so why not apply some logical and joined up logic. Modern communications will result in more work and shopping being conducted from home and hopefully no further increase in travel to work.<br><br>If I relied on travelling to work for an important meeting it would be hopeless by Public Transport!<br><br>Now Buckover can offer new Schools and a Medical Centre, yet with the equivalent 2,000 dwelling current expansion within or perhaps I should say the surrounding semi circle of Thornbury not is 'needed' in Thornbury.<br><br>What expansion to Schools and Medical Facilities is or has occurred within Thornbury?<br><br>What Public Transport links have been provided? |

| | |
|---|---|
| | You did not deliver all that was specified in the previous Local Plan, why not and should you not?<br><br>I think your definition of Planning for the future is far different, unrealistic and unachievable to my radical and realistic way of life that will be 'enjoyed' in twenty years time.<br><br>The Policies are not applied fairly, developers provide as they wish, you do not trade or should I say compromise by hard negotiation to ensure the best deal for everyone; existing residents as well as the influx.<br><br>The infrastructure, transport links, communication links, GP availability, School places etc need to be ensured.<br><br>Not my experience that is for sure. The sewage links from 1990 were never completed for example.<br><br>Frequent electrical power cuts, massive traffic queues, etc.<br><br>Finally why is there not a much greater emphasis to use Brownfield sites first rather than churn up albeit low grade farmland for dwellings? More hard structure surface, less drainage area, less living vegetation, all add to potentially larger Flood Plains.<br><br>My land has been invaded by moles and badgers due to a development. So much for environmental impacts and the care there of!!! |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tony England |
| **Comment ID** | 2949121/1657 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | I have tried to use your online Consultation system but I cannot find any direct link to input my Comments online. It should not be this difficult or confusing. Thus my Comment on the Local Plan due in today is:<br><br>Please remove your support for the Buckover 'Garden Village.' It is the wrong development in the wrong place. This would not only impose thousands of houses and infrastructure on a beautiful vale in open countryside but also place ten thousand adults and children far away from any significant employment, shopping, leisure or Medical Facilities. In my experience of some years in commercial property and the local property market these missing facilities will not be provided in this location.<br><br>These house are undoubtedly required to maintain the prosperity of the region. The obvious place for development is between the M5 at Almondsbury and Winterbourne, East across the M4 from Bradley Stoke. The landscape value here is far inferior to Buckover Vale and is close to all the facilities listed above which Buckover lacks and is adjacent to the new MetroBus system links to Bristol and other North Fringe destinations.<br><br>This location would use some fairly inconsequential Green Belt land, other parts of which you are prepared to release. The numerous power lines and the wind turbines would block further creep to the East. It is surely better to provide homes sensibly located rather than out in the countryside miles from facilities. The Green Belt principle was necessarily created some seventy years ago but all of it cannot be preserved for ever when logic states otherwise.<br><br>I hope you can do the sensible and logical thing, scrap Buckover and support East of the M4, which I am sure could be favourably viewed by the Planning Inspectorate.<br><br>I do not know why there is no easy link from the Consultation Page which seems to just come up with a summary of the Plan rather than an easy link to the Comment input? |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Chris Skidmore MP |
| **Comment ID** | 5008193/1705 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **Strategic Development Locations:**<br><br>I continue to welcome the importance of the Kingswood Green Belt in the Council's thinking which has seen this area avoided for any of the proposed Strategic Development Locations. I believe this approach recognises the significant growth that the Constituency has taken, including at Lyde Green, but also on significant Brownfield sites such as at Douglas Road in Kingswood. You will hopefully need no reminding about the |

| | |
|---|---|
| | massive scale of opposition that there was about the previous Government's Regional Spatial Strategy and its intention to roll back the Kingswood Green Belt to make way for 10,000 more houses.<br><br>**Summary:**<br><br>In summary, I welcome the Council's Consultation and engagement on its new Local Plan as I recognise that the best way to protect and preserve what is valued in the area is to have the most robust and up-to-date evidence available – and that this process helps to achieve this. I would urge that the views of Kingswood residents, traders and community groups are given the significant weight necessary to ensure that any future development is truly sustainable across the Constituency. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | G. E. Forward |
| **Comment ID** | 20176577/1706 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **South Gloucestershire Council New Local Plan 2018 - 2036 Consultation Document - Response Form:**<br><br>The New Local Plan does not address the need for housing for young people and families but uses inaccurate out of date data and is being driven by developers to build larger dearer houses at prices these people will not be able to afford. SGC have been lax in their delivery of Affordable Housing and are attacking the Green Belt, the easy option, without looking at Brownfield sites such as the Kleeneze site. SGC have recently been criticised for their appalling air quality. Increased development on the Green Belt will only make the air quality worse with increased traffic pollution from CO2 emissions.<br><br>In the discussion Document you asked for Responses to 18 Questions.<br><br>In conclusion there is no proper transport structure or plans, no proposals on how present stretched infrastructure such as roads, Schools, Hospitals (we have none in our area since Frenchay Hospital was closed) and Doctors will cope with the proposed increase in housing. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Matthew Ellis BA (Hons) MA MRTPI - Defence Infrastructure Organisation |
| **Comment ID** | 19831937/1733 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **South Gloucestershire New Local Plan Consultation (February 2018):**<br><br>To whom it may concern,<br><br>I write regarding the above – mentioned Consultation on the Emerging new Plan for South Gloucestershire.<br><br>As you will be aware the Headquarters for Defence Equipment & Support is located at the Ministry of Defence site at Abbey Wood. This site plays a vital role in national defence.<br><br>Para 96 of the Draft NPPF recognises the significance of security and defence stating:<br><br>'96. Planning Policies and decisions should promote public safety and take into account wider security and defence requirements by…<br><br>b) Recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.'<br><br>The site is currently operating at full capacity and we would therefore ask the Council to safeguard the surrounding area against any development which might have an adverse impact upon its function, and be supportive of any future proposed developments on the site to meet operational needs.<br><br>Abbey Wood falls within the Harry Stoke area which is designated as the 'North Fringe Cluster' within the South Gloucestershire new Local Plan. The South Gloucestershire new Local Plan identifies that this area suffers from high levels of car use and that transport options are limited and there are challenges to delivering growth in this area. The MOD agrees with this and the travel infrastructure serving the Abbey Wood site, is of particular concern as the local highways infrastructure is not considered adequate to support the large employers based in the Filton area.<br><br>It is acknowledged that whilst additional local housing may be of benefit to some employees, it would also have potential for a negative impact upon and create further strain on an already overstretched transport system.<br><br>As you may be aware the Defence Infrastructure Organisation (DIO) is seeking to establish the foundation for the 'right-sized' Military Estate of the future. There is a strong military imperative that the quality and performance of the Defence Estate must be enhanced in order to sustain, and in places, improve, military capability. Given current and future funding pressures, this can only be achieved if the Estate is significantly smaller and more efficiently utilised, in order to achieve the best value for money from defence funds. |

| | |
|---|---|
| | The Ministry of Defence committed in the 2015 Strategic Defence Review to reduce the size of the Defence Estate by 30 per cent by 2040. 'A Better Defence Estate' (BDES) published in November 2016 identified a number of MOD sites which are surplus to military requirements and which are currently scheduled for disposal.<br><br>Whilst no sites are identified for disposal in BDES in South Gloucestershire both RAF Colerne and Azimghur Barracks, immediately adjacent to the boundary in neighbouring Wiltshire, which are currently scheduled for disposal by 2018 and 2031 respectively. The disposal of these sites is subject to further studies and work is progressing on transport issues. Given the proximity of these sites to the boundary with South Gloucestershire there is likely to be cross – boundary issues arising as a result and seek co–operation from your Council in addressing these issues.<br><br>Should you have any queries regarding the above please do not hesitate to contact me. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hazel Jones - Hawkesbury Parish Council |
| **Comment ID** | 16665185/1734 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Response to this Document has been made difficult through an unhelpful and unfriendly website.<br><br>No support has been provided by South Gloucestershire Council in providing help and support in responding to this Consultation. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Bloor Homes |
| **Comment ID** | 17351489/1740 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | 1.6 Our Representations are set out as follows:<br><br>o Chapter 2 - Local Plan's key issues and priorities;<br><br>o Chapter 3 - the Local Plan Strategy;<br><br>o Chapter 4 - the Strategic Development Locations;<br><br>o Chapter 5 - the Policy discussion points; and<br><br>o Chapter 6 sets out our conclusions.<br><br>**2.0 KEY ISSUES AND PRIORITIES:**<br><br>2.1 Part 1 of the SGLP Consultation Document summarises the key issues and priorities for the New Local Plan under the following headings:<br><br>- Population and housing.<br><br>- Local economy.<br><br>- Infrastructure and services.<br><br>- Travel accessibility.<br><br>- Environment.<br><br>**Population and Housing:**<br><br>2.2 Under the Population and Housing heading, the Plan states:<br><br>**"The priority for the SGLP is to identify land for new housing to meet the housing requirement set out in the JSP."**<br><br>2.3 Bloor Homes has objected to the JSP's provision for housing, which at 105,500 homes is well below the OAHN for the West of England. Barton Willmore's research identifies the full OAHN for the West of England to be a minimum of c.**140,000** additional dwellings over the period 2016 – 2036. Therefore, the housing requirement provided for in the JSP and the proportion of housing taken forward into the South Gloucestershire Local Plan (32,500 dwellings) is too low, has not been positively prepared and the Plan is therefore unsound. This is dealt with further in the next section of these Representations. |

**Local Economy:**

2.4 Under the Local Economy heading, the Plan states:

**"The JSP has set a challenging growth agenda which our Plan must proactively address by embracing the growth agenda by providing sufficient employment land to meet the needs of our businesses…"**

2.5 There is an oversupply of employment land in South Gloucestershire, relative to employment land requirements and therefore, additional land (beyond that already permitted or identified to have future potential for employment1) is not required. This situation should be explained properly in the key issues and priorities section of the Plan to inform that Strategy that needs to be taken.

1 Comprising land at Avonmouth/Severnside (364.8 ha), Emersons Green (43.6 ha), North/East Fringe (including Land at Aztec West, Bradley Stoke, Cribbs Causeway, Longwell Green and Warmley – 9.5 ha), and 12.5 ha on other sites in South Gloucestershire.

2.6 This point is dealt with further in Section 4.

**3.0 LOCAL PLAN STRATEGY:**

**Housing Requirement:**

3.1 The Local Plan Strategy makes provision for a total of 32,500 homes. Bloor Homes has already objected that the overall provision for housing in the JSP (105,500 dwellings) is too low as it does not reflect the Objectively Assessed Need for the West of England. A summary of the Representations submitted on this point are provided in Appendix 2.

3.2 It thus follows that the provision for housing in South Gloucestershire is too low as it takes as its housing requirement a proportion (30.8%) of the West of England housing requirement. Evidence shows that the full OAHN for the West of England is a minimum of 140,000 dwellings over the Plan Period to 2036, of which 30.8% gives rise to a housing requirement of 43,120 dwellings for South Gloucestershire.

3.3 Bloor Homes object that the SGLP's provision for 32,500 dwellings has not been positively prepared and is therefore unsound and should be increased to a minimum of 43,120 dwellings. Also, the 32,500 figure does not reflect the JSP's ambitious vision for economic growth nor will it address the affordability crisis recognised in the population and housing priority section of the SGLP.

**Distribution of Development:**

3.4 The New Local Plan Consultation Document summarises the Development Strategy for South Gloucestershire as taken from the Emerging JSP

3.5 At a main settlements level, the New Local Plan has the same shortcomings as the JSP in that there is very little in the way of an informed, integrated, Spatial dimension to the distribution of growth across the District driven by the function of particular places and a Strategy for their future. Therefore, there is no Spatial Strategy for South Gloucestershire or for Thornbury and yet big decisions are being made about future growth and where it will go which should be informed by evidence and directed by some sort of overall Spatial Strategy for the area – as would have been found in a Regional Strategy, or their predecessors – Structure Plans. The South Gloucestershire Strategy which repeats what is in the JSP reads more like a land availability/housing supply exercise, where development is distributed according to housing supply types, rather than an overall Spatial Strategy dealing with the main urban and rural settlements.

3.6 The New Local Plan Strategy divides the housing requirement as follows:

Existing Core Strategy site and commitments - 22,3000.

Urban living - 2,900.

Strategic Development Locations - 6,000.

Non-strategic sites in rural areas - 1,300.

Total - 32,500.

3.7 There is no evidence provided to explain how the Council has arrived at this breakdown in respect of the first two categories. For instance, no evidence is provided on existing commitments nor is there any analysis of residential capacity of sites making up the urban living allowance. In the absence of this evidence, these figures are not justified and certainly in the case of the urban living element, not deliverable.

3.8 We are aware that the 6,000 for SDLs is taken from emerging guidance in the JSP and the provision for non-strategic growth appears to be the residual element leftover once other forms or supply are subtracted from the overall requirement, rather than being a bottom up (i.e. informed by level of need in rural areas) figure. In any event, the evidence shows that a housing requirement that reflects the full OAHN for the West of England and South Gloucestershire, coupled with the lack of evidence on the deliverability of the urban living element demonstrates a need for a larger number of SDLs and potentially non-strategic sites in rural areas in South Gloucestershire.

3.9 South Gloucestershire's New Local Plan will still need to demonstrate a five year supply (which it does not currently have) and Land at Crossways is suitable for circa 150 dwellings, available for delivery in the next 5 years.

3.10 As Page 3, Para 1 of the New Local Plan Consultation Document states - "There has never been greater pressure on our urban and rural areas

to accommodate additional housing and economic growth" and yet the Plan does not seek to be as ambitious as it could be towards economic growth, nor is it trying to meet the full OAHN for the District. This is likely to constrain economic growth and to lead to higher house prices, rather than addressing housing pressures.

**Strategy for Thornbury:**

3.11 Despite being one of the West of England's key Market Towns, in the absence of a Spatial Strategy for Thornbury, the SDLs represent the future Strategy for the town. 500 new dwellings are directed to an SDL at Thornbury, which is considerably less than that directed to other smaller settlements in South Gloucestershire. We are not suggesting that all of these are the wrong locations for growth, but compared with the role and function of Thornbury which is a very sustainable location for growth, Thornbury's allocation is very low.

3.12 Therefore, as a higher order settlement, provision for additional housing at the SDL for Thornbury should be at least 650 dwellings to reflect the role and function of the town and to take account of the true capacity of land within the area of search around the Northern and Eastern edge of the town for residential.

3.13 The SDL for Thornbury was 600 dwellings in the previous Draft of the JSP in the Emerging Spatial Strategy Document, now reduced to 500 dwellings. The only plausible explanation for this is that the Council appear to consider that the finite capacity for growth at North and East Thornbury is defined by the current line of committed development, along with sites which are the subject of current Applications/Appeals which wrap around the North and East of Thornbury. Beyond this line of commitments/developable land, the Council is proposing a Strategic Green Gap – see the Council's Concept Plan below, taken from the South Gloucestershire New Local Plan Consultation for Thornbury (September 2017).

Please see the attached Document for the missing Concept Plan which is referenced in the point above.

.14 The only site that is not currently the subject of an Application along the North or Eastern edge of Thornbury is Land at Crossways, which the Council has now identified for employment in the JSP Publication Document, and hence removed from the potential housing supply, thus reducing the SDL for Thornbury from 600 to 500 dwellings. Bloor Homes object to this change.

In summary, Land at Crossways is not suitable, available or viable for employment development (discussed further in the next Chapter of these Representations) and therefore the Plan is not justified or effective in respect of its proposals for Thornbury and the Plan is unsound. The housing potential of the Thornbury SDL should be increased to at least 650 dwellings and the employment requirement for Crossways deleted and its residential potential reinstated.

**4.0 STRATEGIC DEVELOPMENT LOCATIONS:**

4.1 The New Local Plan Consultation Document simply summarises the headline Strategy for the Strategic Development Locations (i.e. – overall amount of development directed to the 5 SDLs) as set out in the Emerging JSP, without adding anything further and largely signposting to the JSP's website. Therefore, the proposals for the Thornbury SDL experiences the same shortcomings as is found in the Emerging JSP.

4.2 As currently drafted, the JSP and the South Gloucestershire New Local Plan directs a maximum of 500 dwellings to the Thornbury SDL overall, but identifies the Crossways site for 5ha of employment development.

**Thornbury SDL: 500 Dwelling Cap:**

4.3 Bloor Homes has objected to the 500 dwelling cap that that the JSP has set on the amount of housing directed to the Thornbury SDL and as this is carried through into the South Gloucestershire New Local Plan, we raise that objection here also. Setting a maximum is unsound, as established in the Woodcote Neighbourhood Plan, where the Inspector found:

**"The National Planning Policy Framework, in establishing a presumption in favour of sustainable development, states that Plans should meet objectively identified needs, with sufficient flexibility to adapt to change. It is recognised that sustainable development is about positive growth. As worded, Policy H1 would not allow for any residential development, no matter how sustainable, above the maximum figure. As such, it seeks to impose an inflexible Policy and in the light of national Policy, an inappropriate approach to sustainable development"** (Page 27)**.**

4.4 The Woodcote Inspector went on to state that the wording of Policy H1 was such that the Neighbourhood Plan could not progress to Referendum and he recommended the modification below:

**"Policy H1 to read: Planning Permission will be granted for a minimum of 73 new homes to be built in Woodcote…"**

4.5 This demonstrates that Plans cannot be used to set absolute limits on development, regardless of the size of development planned as this is not in general conformity with the NPPF.

Whilst the broad location of growth at North and East Thornbury is supported, Bloor Homes object that the provision for housing is not commensurate with the role and function of the town and the approach towards setting a maximum figure for housing at the Thornbury SDL is unsound. Any Local Plan Policy for Thornbury should seek a minimum of 650 dwellings at the Thornbury SDL. This would take account of the potential residential capacity of Land West of Gloucester Road (130 dwellings), Cleve Park(350 dwellings) and Land at Crossways (circa 150 dwellings).

**Thornbury SDL: Employment Land Requirements:**

4.6 The New Local Plan Consultation Document is silent on the matter of the employment land requirements for the Thornbury SDL but given that it will carry forward the SDL locations in the JSP, we raise our objection here too.

4.7 The JSP currently identifies Land at Crossways for 5 ha of employment. However, the West of England Economic Development Needs

Assessment (EDNA 2016) shows that there is already plenty of employment land available in South Gloucestershire to provide for the medium-high economic growth scenario (which is the growth target that is being applied by the JSP) - see EDNA Table 7-1 and 7-3 copied below:

Please see the attached Document for Table 7-1.

Table 7-1 Demand – supply balance 2016 – 2036 – medium-high scenario (**sq m**).

Please see the attached Document for Table 7-3.

Table 7-3 Demand – supply balance 2016 – 2036 – medium-high scenario (**ha**).

4.8 The EDNA calculates a demand for **337,000 sqm** (75 ha) of employment land across South Gloucestershire for the medium-high growth scenario (although this is based of 2015 OE figures rather than 2017 OE projections). Comparing this demand with that with Planning Permission (**950,110 sqm** – see EDNA Table 5-6), along with the future potential of land for employment (**140.2 ha**2 - see EDNA Table 5-7), there is a considerable oversupply of employment land in the District. Table 7-3 quantifies this oversupply at South Gloucestershire alone at **508 ha**. The EDNA calculates that Land at Avonmouth/Severnside has capacity for 364.8 ha of B2 and B8 and whilst this makes up a large proportion of the oversupply, there is still a further 143.3 excess employment land on sites other than Avonmouth/Severnside compared with the medium-high growth scenario's demand. The EDNA concludes in Para 5.34 that "the WoE has a good portfolio of fit for purpose employment land." Certainly in South Gloucestershire, there is more than sufficient supply against the different B class requirements.

2 Comprising Land at Avonmouth/Severnside (364.8 ha), Emersons Green (43.6 ha), North/East Fringe (including Land at Aztec West, Bradley Stoke, Cribbs Causeway, Longwell Green and Warmley – 9.5 ha), and 12.5 ha on other sites in South Gloucestershire.

4.9 Despite this, the JSP and the new Local Plan are seeking to deliver additional employment land on some of the SDLs in South Gloucestershire. For the Thornbury SDL, this includes 5 ha of employment land (workshops, logistics) at Crossways.

The allocation of employment on the Crossways site is contrary to the evidence in the EDNA which shows that there is plenty of employment land available on other more suitable sites across South Gloucestershire. The proposals for Crossways are not supported by any evidence on specific employment land requirements at Thornbury, and whether there is demand for workshops and logistics space in the town. The proposal for employment on the Crossways site is therefore not needed, nor justified and Policy proposals for employment are unsound.

4.10 The EDNA carried out an assessment of key existing employment sites, which included a field survey of the Industrial Estate at Thornbury. This states:

Please see the attached Document for the missing Table which is referenced in the point above.

EDNA, Page 89.

**Community Exhibitions:**

4.31 The Council ran a series of Local Plan Consultation events, including one in Thornbury on the future of the town.

4.32 Each event consisted of an interactive exhibition, followed by 'table-top' workshops where ideas about possible new neighbourhoods were explored and mapped. The Council's Concept Diagrams were the starting point for discussions.

4.33 Consultation Report 2C summarises the findings of the Thornbury event. In relation to Crossways, the following are noted from the 'drawing on' and' table top' workshops:

o "Housing rather than employment" annotated on the location of the Crossways site (Page 5).

o Extension of employment area shown at South Thornbury, adjacent to the existing employment area (Page 6).

o Protect character of lanes around the Crossways site (Page 7).

o 'Cross' on Crossways employment allocation and employment repositioned at Southern Gateway (Page 7).

o Employment again, shown further South in Gateway location (Page 8).

o Siting of employment land [on the Crossways site] is questionable for access and impact? (Page 9).

o Concerned about run-off and flooding on the Crossways site (Page 9).

o Is this really a good location for employment? [written on the location of the Crossways site] (Page 9).

4.34 The Consultation Report 2C for Thornbury sets out a series of recommendations, two of which apply specifically to Land at Crossways:

| | |
|---|---|
| | o Reconsider Employment Land Allocation Strategy – ensure locations will be capable of attracting good quality work opportunities (Para 9.2).<br><br>o Preserve rural quality of Crossways Lane as potentially a vital link in the future (especially for cycling) (Para 10.2).<br><br>4.35 It is clear from the Consultation event that the local community do not support the development of the Crossways site for employment and consider that there are more appropriate locations for additional employment land to the South of the town.<br><br>**6.0 CONCLUSION:**<br><br>6.1 We summarise Bloor Homes Comments on the South Gloucestershire New Local Plan Consultation as follows:<br><br>**Housing Requirements:**<br><br>6.2 The provision for housing in the South Gloucestershire New Local Plan is too low as it does not take its requisite share of the full OAHN for the West of England sub-region.<br><br>6.3 Evidence shows that the full OAHN for the West of England is 140,000 dwellings over the period to 2036, of which South Gloucestershire should be planning for at least 43,120 dwellings (based on the current 30.8% proportion proposed in the emerging JSP for South Gloucestershire).<br><br>**Local Plan Strategy:**<br><br>6.4 The New Local Plan distributes development into a number of housing supply types (i.e. commitments, urban living, SDLs, and non-strategic sites) but it does not give any Spatial expression in terms of what is sought for the main urban and rural areas or how much growth is directed to them at a strategic, placed based level. Without this information it is very difficult to assess the scale of change and Strategy for places over the Plan Period, and to assess whether this is the most appropriate Strategy for South Gloucestershire.<br><br>6.5 No evidence is provided on how the Council has arrived at the commitments total, or the residential potential associated with the 'urban living' supply category. In the absence of this evidence, these figures are not justified and certainly in the case of the urban living element, not demonstrated to be deliverable.<br><br>**Strategic Development Locations:**<br><br>6.6 Whilst an SDL is supported at Thornbury, Land at Crossways is not suitable, available or viable for employment development nor is employment development supported by the local community in this location.<br><br>6.7 The South Gloucestershire New Local Plan should be clear about the total amount of growth to be directed to Thornbury which includes commitments and additional growth. If the only capacity for growth around the town is considered to be within North and East Thornbury (as appears to be the current position), the additional housing to be directed to Thornbury (on top of existing commitments) should be increased to at least 650 dwellings to reflect the role of the town and the potential capacity for housing in the area of search around the North and East of the town.<br><br>6.8 The allocation of employment on the Crossways site is contrary to the evidence in the EDNA which shows that there is plenty of employment land available on other more suitable sites across the District. The JSP proposals for Crossways are not supported by any evidence on specific employment land requirements at Thornbury, and whether there is demand for workshops and logistics space in the town. The proposal for employment on the Crossways site is therefore not needed, nor justified.<br><br>6.9 The proposals for 100% employment on the Crossways site will not yield competitive returns to the landowner and developer to enable the development to be deliverable and therefore any such proposals would be unsound as they would be inconsistent with national Policy and not effective, deliverable or justified.<br><br>6.10 Land at Crossways has been consistently promoted for housing and the location is residential in nature and this was recognised in previous stages of the JSP. The site is relatively unconstrained and well related to the town and has capacity for up to 150 dwellings, deliverable within 5 years.<br><br>6.11 To be sound, the housing potential of the Thornbury SDL, as reflected in the South Gloucestershire Local Plan, should be increased to a minimum of 650 new dwellings and the employment requirement for Crossways deleted and its residential potential for 150 dwellings reinstated. |
| **Attached documents** | Bloor Homes - Barton Willmore (Lauren Taljaard).pdf (1.6 MB) |

| | |
|---|---|
| **Respondent Name** | Julia Deacon |
| **Comment ID** | 19935713/1743 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Good evening,<br><br>I would like to respond to the Local Plan Consultation. My family moved to because of the lovely green spaces and the Green Belt land located close to where we live. If the proposed plans for housing on the Cricket Ground and other Green Belt land go through this would ruin what has been a lovely quiet area and the resulting increased traffic along Abbots Road would make a quiet road very busy and School places oversubscribed. |

| | |
|---|---|
| | I support the views and Reports submitted by Hanham District Green Belt Conservation Society and the Keep Hanham Abbots Special Group. Specifically regarding the Call for Sites Map. I do NOT believe the sites (listed below) should go forward for assessment as they do not align with the Vision, Strategy and Policies set out in the Plan or the Joint Spatial Plan:<br><br>List:<br><br>SG125 Green Belt by Junction of Court Farm Road/Willsbridge Hill.<br><br>SG50 Green Belt Common Road.<br><br>SG32 Green Belt Castle Farm Road (Water Lane/Bickley Close/Hencliffe Way).<br><br>Hanham Hills:<br><br>SG105 Green Belt & Conservation Area Abbots Road/Court Farm Road.<br><br>SG283 Green Belt Williams Close.<br><br>SG41 Green Belt Mount Pleasant Farm. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | T. K. Hellen |
| **Comment ID** | 3985729/1755 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **Reply to SGC Local Plan:**<br><br>*My Comments are of a general nature, so I have listed them below rather than in the Paragraph sequence of the Local Plan Report.*<br><br>1. The opening lines of the proposed "The new South Gloucestershire Local Plan" are:<br><br>"There has never been greater pressure on our urban and rural areas to accommodate additional housing and economic growth. There is an urgent need to plan ahead for the homes, the workplaces, services, facilities and infrastructure that will meet our needs up to 2036 and ensure the continuing prosperity of our area."<br><br>It must also be added that "there must equally be great pressure to preserve our countryside land, both Green Belt and Greenfield." In South Glos, particularly, there is very limited space for extra housing, but just building on the green fields around the outer ring of the County, such as Thornbury, Falfield and Charfield, is not an answer to the above pressures. Since there is very limited infrastructure there, any extra housing (such as Buckover Garden Village) will merely strain the existing infrastructure to intolerable levels and add to the high traffic levels and the potentially dangerous amounts of pollution due to inevitable cross-County commuting. In addition, the employment opportunities in the outer ring are very limited, currently with hardly any job vacancies. Since the commencement of its Core Strategy, Thornbury has lost over 700 job positions with no sign of any reversal.<br><br>If the Plan is to have any positive value, it should be addressing as its top priority the needs in the second opening sentence, namely "workplaces, services, facilities and infrastructure." Only when and if they can be justified and provided will an idea of housing need be available.<br><br>2. The Plan itself is premature. It should wait until the JSP is accepted since it has yet to undergo its Examination in Public, and so no one knows what will be included. Also, the Plan should be guided by the Framework of the new NPPF, which is also still under Consultation. Since the JSP and new NPPF are not likely to be finalised until 2019, so should this Local Plan be deferred. Otherwise there is a danger of premature Planning Permissions being activated or even Approved under the auspices of this Plan before those peer Plans are fully accepted.<br><br>4. Transport is one of the major hurdles to housing development in South Glos. Developments in the outer ring imply almost exclusive private car use for daily commuting, socialising, recreation etc.<br><br>New housing in those towns will produce on average between 1½ and 2 extra cars per household. This equates to considerable increases in pollutant emissions like CO2, NO2 and particulates which are dangerous to health. The new Housing Estates also attract delivery vehicles in ever-increasing numbers, all adding to the pollution problems there. But the pollution will be more considerable in the cities and places of employment at the other end of the commute. The daily invasion of vehicles from the outer ring developments into the urban areas will be considerable, with each car doing at least 40 kms per day. Replacing fossil powered cars by electric cars doesn't eliminate the pollution problem, since battery recharging requires large amounts of electricity which is generated mainly by Fossil Fuels at Power Stations, and particulates come from brakes and tyres in every type of vehicle. |

| | |
|---|---|
| | An estimate of the CO2 emissions from a 3,000 home development like Buckover GV can be made assuming 5,000 car journeys are made daily for an average commuting distance of 40kms. Assuming a modest petrol car with an emission level of 150g(CO2)/Km, this would produce 1,200 Kg of CO2 per year per car. Hence the 5,000 car journeys would generate 6.0 million Kg of CO2 per year, or 3,000 tons.<br><br>Public Transport such as buses is only effective in urban areas like Bristol and Bath. For the outer ring, they are too slow, infrequent and operate on limited routes and so are effectively not used. Sites of employment are scattered all over the local Counties so a vast percentage (>90%) of commuting will be by private car. The same limitations apply to Park and Ride schemes.<br><br>5. Traffic congestion is also a major issue. Commuting blackspots are on the increase and proposed developments like the Buckover GV will add unpredictable effects. The locating of this GV, astride the A38, represents the nadir of local Planning. As a Relief Road for the M5, this stretch of the A38 is often jammed with traffic when Motorway accidents occur, at weekends and throughout the many holiday periods. These accidents are becoming more and more frequent as the M5 gets busier due, in part, to all the extra housing in the locality. Accidents cause delays between Junctions 14 and 15 of many hours, leaving the A38 as the only alternative route for traffic between the North, including the outer ring towns and villages, and Bristol and Bath to the South.<br><br>6. The situation with the Buckover GV will be resolved during the Examination in Public and concluding stages of the JSP progression. The Buckover GV proposal is extremely unpopular with the local communities for well-publicised reasons, and has seen almost unanimous rejection in at least two major Surveys. It has also been discussed in Parliament and the local MP, Luke Hall, agrees with most of the local inhabitants that the proposal is merely a “town expansion” rather than the convenient “garden” label that is being used for PR purposes. The so-called “green gap” between it and Thornbury, only a few hundred metres wide, is a pathetic attempt at establishing Buckover’s independence. In fact, Buckover GV will depend strongly on Thornbury for most of its infrastructure and is proposed because it is landowner led, not community led.<br><br>7. The proposed opening of Charfield Rail Station will have minimal effect. Like buses, trains only go on limited routes. The train frequency will be very limited because the line is already very busy, and the car park at Charfield (currently not even planned) will be so limited that motorists will be discouraged from using the station. Passengers from Gloucestershire (Wotton and Charfield, etc) will also be in competition for the limited parking places. This station should not be used as a transport justification in this Local Plan until it has been approved for such by the Rail Authorities, and key factors established, such as feasibility of a sufficiently acceptable time table, location of platform and parking, and most importantly a guarantee of funding.<br><br>8. The proposed Local Plan quotes housing numbers from the JSP, which have not yet been accepted. We have demonstrated that SG’s figures are too high (see below). There is little sign of commensurate supporting infrastructure whatever the number of houses are proposed.<br><br>The number of new jobs created and the number of new dwellings required for the lifetime of the proposed JSP (up to 2036) are derived from the economic outlook for the West of England LEP, commissioned from Oxford Economics (OE) in September 2015. OE used data from 2014 and assumed a medium-high growth scenario along with a growth in GVA (effectively GDP) of 3.0% per year to 2025 and 2.8% thereafter. We now know, from the forecasts of the Office for Budget Responsibility (OBR) in November 2017, this is highly unrealistic. In fact, The OBR predicts GDP growth to be 1.5% in 2017 down from 2.0%, 1.4% in 2018, 1.3% in 2019 and 2020, 1.5% in 2021 and 1.6% in 2022.<br><br>Hence it is necessary for a revision to the JSP to take account of this considerable economic downturn. Using the same logic and procedures as in the OE Report, we have re-calculated the revised number of jobs and housing requirements in the West of England LEP up to 2036. The figures are a lot lower than in the JSP. The details of these re-calculations are given in the JSP reply from the CPRE (Campaign to Protect Rural England) submitted in early January. Since then, newer OBR figures for GDP growth have slightly decreased even more, and it appears that uncertainties over BREXIT will maintain this situation in the foreseeable future.<br><br>The conclusion is that the economic downturn has produced a sequence of revised GVA/GDP values over 2016 - 2036 which, using the OE Report’s logic but with these revised input values, gives a value of 20,000 new jobs using OE’s baseline scenario and 54,000 new jobs using OE’s medium-high scenario. For the latter scenario, the new housing requirement is 73,400 across the West of England LEP during 2016 - 36. This includes the OAN supplement of 9,400 as used in the current JSP proposal. Since OE recommended to the West of England LEP that the medium-high scenario should be used, we have retained that scenario here. **Our new calculations show that the JSP figure of 102,200 new houses over the period 2016 - 2036 has to be reduced to 73,400**, saving the need to build 28,800 new houses. This would avoid the need to build the West of England Garden Villages thereby avoiding all the problems they would generate.<br><br>This new figure (73,400) should therefore be used onward as well as all the other estimates based on this fundamental value. To recap, this revised figure is based on more up-to-date GDP input values, and so has to be adopted according to the NPPF Paragraph 158 which says: *“Each Local Planning Authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local Planning Authorities should ensure that their assessment of and Strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.”*<br><br>9. My conclusions for the Local Plan are that the extra required building has to be made in urban centres (Bristol and Bath) but with emphasis on high-rise mansion-type buildings. This gives good access to all the city amenities, for work, Schooling, pleasure, Hospitals, etc, and would remove non-Public Transport dependence. The remote rural areas should be restricted to minimal development growth commensurate with local need. Rural lands could then be dedicated to growing agricultural needs of the future.<br><br>Good examples of this approach exist in many European cities. For instance, Vienna covers an area about the same size as Bristol. Bristol has half a million inhabitants, Vienna has 3.5 million inhabitants but also many fine palaces and public buildings, with a much higher reputation than Bristol. There are many mansion-type buildings, some of very high quality and renowned architectural appearance. Also there is an enviable Public Transport system. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Annita Signorelli |
| **Comment ID** | 19937089/1765 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | This year Theresa May announced a major overhaul to the National Planning Policy Framework which was published on 5th March [2018] from Ministry of Housing, Communities and Local Government, Prime Ministers Office, 10 Downing Street and The Rt. Hon Sajid Javid MP. |

| | |
|---|---|
| | SGNLP Planners appears not to have fully comprehended the Policy content or taken on board the content of the transcript of Sajid Javids' speech where he says and I quote "THESE REFORMS ALSO INCLUDE MORE FLEXIBILITY TO DEVELOP BROWNFIELD LAND IN THE GREEN BELT, BROWNFIELD LAND BEING DEFINED AS LAND PREVIOUSLY USED OR BUILT ON AS OPPOSED TO GREENFIELD LAND THAT HAS NEVER BEEN BUILT ON ..... TO MEET AFFORDABLE HOUSING NEEDS, [presumably if a need has been identified].... STRONGER PROTECTION TO ANCIENT WOODLAND - The land at Buckover and surrounding areas has trees that are ancient such as OAK.<br><br>SAFE GUARDING ASSETS THAT CANNOT BE REPLACED FOR GENERATIONS TO COME..<br><br>Surely that would include AGRICULTURAL LAND which, once gone cannot be replaced – technically more important than Grade 2 Listed Buildings.<br><br>The agricultural land farmed at Buckover and beyond contributes to our economy.<br><br>Once that land is lost all that was farmed there will have to be sourced from elsewhere, maybe even Imported.<br><br>So much agricultural land has been lost, should Britain ever find itself in a state of War and unable to import - we will not be able to produce enough food to feed people -and the impact will be far reaching.<br><br>RE: SHMA.<br><br>Relying on 'bought in/commissioned/statistical information based on historical supposition and conjecture and does not take into account hard cold facts like how is the local infrastructure going to accommodate 3 car families - a potential vehicular increase of 97,500 vehicles on the road –e.g. Mum, Dad, oldest child at Uni – all leaving for Work/Uni/College at the same time in the mornings - but going to different establishments - and returning in the evening – on our already over stretched A38 and M5 Motorway. WHY IS THERE NO MENTION OF THIS? I WOULD HAVE THOUGHT THE ISSUE OF INFRASTRUCTURE WAS PARAMOUNT TO THE SITUATION - OVER AND ABOVE EVERYTHING ELSE.<br><br>USING THE SHMA FORMULA OMITS THIS GLARINGLY OBVIOUS ISSUE IN THE CASE OF THORNBURY AND SURROUNDING/ OUTLYING AREAS.<br><br>The romantic idea that everyone can 'work from home' negating the need to travel is fatuous.<br><br>Thornbury and the outlying areas - significantly Buckover - cannot be superimposed with the current SGNLP - with the best will in the world, the local infrastructure and issues regarding surface water drainage, cannot accommodate it – short of razing the likes of Knapp Road/Crossways Lane, Buckover, Lower and Upper Morton, Whitfield and Falfield and the local houses to the ground and constructing completely new land drainage separately to sewage drainage.<br><br>Locally the old Houses and Cottages had/have their own Water Wells and if the surrounding land is concreted over slowing local available drainage, flooding to these properties may occur.<br><br>At times of persistent rainfall, surface water drains off the A38 ridge into the lower lying land in the 'bowl 'of Thornbury which cannot directly be channelled into drains as it seeps into the land running parallel to and below the A38, causing flooding.<br><br>Thornbury already has waterways running through it which fill up to capacity at times of severe rainfall. On the assumption that newcomers to the area will not be buying their houses outright and will need mortgages, will people be able to obtain house insurance in an area at risk of flooding.<br><br>Additionally, on the other end of the scale today in Buckover Swallows have been swooping over the yellow rapeseed fields which in turn are teeming with bees and bumble bees, what provision for them? |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | John Allinson |
| **Comment ID** | 19466209/1767 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sir,<br><br>I wish to submit the following points: |

| | |
|---|---|
| | 2. The necessary 5 year supply of housing, the absence of which has led to developers doing what they like, where they like in a sort of Planning by Appeal, should be addressed forthwith. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David Jonathan Redgewell - Bus Users UK |
| **Comment ID** | 20186593/1769 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | The Science Park, Emersons Green, Bristol:<br><br>Needs to provide employment and Education sites as part of Bristol and Bath Universities.<br><br>Welcome Tourism Development of a new Hotel retail and Leisure activities. Note No Tourism Policy in the Local Plan.<br><br>The area needs good public releam Improvements to MetroBus routes to UWE BRISTOL PARKWAY Patchway Station Cribbs Causeway and Henbury Train Link to Severnside.<br><br>Housing Affordable Shopping facilities better Bus services and Links to Bath for Light Rail Via The Warmley oinland Common Bitton Kelton/ Saltford and Weston Riverside LRT route For Bath Spa University. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David Jonathan Redgewell - Bus Users UK, TSSA, Railfuture, Severnside |
| **Comment ID** | 20187777/1774 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Staple Hill, Kingswood, and Hanham:<br><br>Support Urban Regeneration in Staple Hill.<br><br>High Density Housing Shops and office use of the Bristol to Bath Yate Cycleway Midland Railway as a Light Rail System and Shared path.<br><br>Kingswood needs regeneration in a Joint Policy with Bristol City Council Core Strategy Local Plan.<br><br>Moravian Road could have a building over the Car Park housing flats and a Tail building.<br><br>The air quality needs improving through the High Street.<br><br>The Nonformist Chapels need Restoration and Improving the Tourist Industry With the Greater Bristol area and Kingswood Town Centre.<br><br>The Town Centre needs improvements in public Realm and Pavement Bus waiting facilities and Shelter Realtime Information and Street Trees.<br><br>Support Work Place parking and Parking charges Within the Town Centre.<br><br>The Town Centre needs to retain Public Toilet facilities including disabled changing places.<br><br>The Whitfield Tabernacle and Warmley Gardens are of historic sites and need restoration for Visitor/Tourist and Resident.<br><br>South Gloucestershire CC Should CPO the site if no developer can regenerate the site.<br><br>Kingswood Park Could have new housing nearby on the Former Library site. Moving to the Civic Centre 2018 - 2019?<br><br>Welcome Kings Chase Shopping Centre Regeneration. |

| | |
|---|---|
| | More housing, flats, and a Hotel Could be provided in to the Town Centre.<br><br>High Street and Regent Street Buildings in need of Regeneration need knocking down. The Shopping Centre needs to improve its middle Clan office to compete With Bath City Centre, Cribbs Causeway Town Centre and Bristol Broadmead.<br><br>A Kingswood "Bid" Would help.<br><br>Hanham:<br><br>Hanham needs Improvements on the Showcase Bus route to Bath. Better Bus Waiting facilities and realtime information.<br><br>More Affordable Housing on Land towards Longwell Green.<br><br>Welcome the Work on the Kleeneze site for Housing and mixed use Employment offices. Bus services Will need to improve in this area including the MetroBus between BRISTOL and Bath via Hanham and Longwell Green Bitton onwards back to Bristol via Cadbury Heath, Warmley, Kingswood, St. George, Lawrence Hill, Bristol City Centre.<br><br>Hanham Mount also needs a Regeneration Strategy.<br><br>Longwell Green needs to improve the Employments site.<br><br>Regeneration of the public Realm are required in the Retail Parks.<br><br>The Bristol to Bath Railway Path Cycleway is also key to a Light Rail System between Bristol Lawrence Hill, Easton, Fishponds, Staple Hill, Mangotsfield, Emersons Green, Yate and through Warmley to Oldland, Bitton, Kelston, Saltford, Newbridge, and Bath City Centre to focus on Regeneration and improving Congestion. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sydney Freed (Holdings) |
| **Comment ID** | 19730721/1786 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sir/Madam,<br><br>**South Gloucestershire Local Plan 2018 - 2036**<br><br>In accordance with the ongoing Consultation exercise (5th February to 30th April 2018) please accept this letter as formal Representations on the Consultation Document of the proposed new South Gloucestershire Local Plan 2018 - 2036 (hereafter referred to as the SGLP).<br><br>These Representations are submitted on behalf of Sydney Freed (Holdings) (hereafter referred to as SFH), a local landowner and development company with a long track record of development of residential and commercial development, both independently and in conjunction with partners. Stride Treglown act on their behalf in respect of their landholding in the Engine Common/Yate area.<br><br>*Joint Spatial Plan:*<br><br>Prior to the publication of the SGLP Consultation Document we have made Representations in respect of the now submitted Joint Spatial Plan(JSP) for the four West of England Unitary Authorities. Those Representations offered in-principle support to the proposed Plan, in particular the proposed Strategic Development Location (SDL) North West of Yate, within which area SFH have landholdings. A copy is attached to these Representations.<br><br>In supporting the proposed SDL we indicated a view that it would be beneficial to approach this, and other similar locations, from a comprehensive masterplanning and visioning position, in order to ensure that the Council are in a position to ensure the comprehensive delivery of development. Such an approach will ensure a co-ordinated approach to a range of matters, including the delivery of any necessary infrastructure to support development. |

| | |
|---|---|
| | *SGLP Comments:*<br><br>In respect of the SGLP, we support the manner in which the Emerging Plan reflects the strategic approach outlined in the JSP, specifically in respect of Land North of Yate, including Engine Common.<br><br>Specifically, we note that Paragraph 2.10 proposes area specific visions for those locations where *"There will be more than 'business as usual change.'"* The inclusion of Yate is supported albeit we would question whether it should be presented as a standalone vision, rather than grouped with Chipping Sodbury and Coalpit Heath. Separation would be justified given the significance which the JSP places on the development potential of North Yate. Furthermore, a standalone vision would support the desire to ensure a comprehensive approach to development.<br><br>Paragraph 2.11 continues, noting that the long term visions will *"Have supporting site allocations where appropriate."* We would support the principle of site allocations although consider that it is imperative that there is firm commitment to allocating sites where they fall within the SDLs. Failure to allocate would risk delivery of the long term Strategy for housing growth of both the SGLP and JSP, a point noted within our Representations to the JSP Consultation.<br><br>Yate is considered in detail within the 'Urban Localities' Section of the SGLP. Within the summary it is noted that there will be a "whole town" approach to future development. We support this approach in the interests of good placemaking and ensuring that new development is well integrated with the existing built environment, together with ensuring a co-ordinated approach to infrastructure is followed.<br><br>The JSP Strategic Development Locations are considered in greater detail from Paragraph 2.30 onwards. As noted, the principle of land North of Yate being identified as a SDL is supported, both via the JSP and SGLP process. With specific regard for the approach proposed to their future delivery, we agree with the position outlined in Paragraph 2.36 in respect of how development is planned and delivered.<br><br>Specifically, it is recognised that there is developer interest in a number of locations, including within Yate, to bring forward early development. Whilst this can be beneficial in respect of ensuring a steady supply of land for housing to meet market needs, thus supporting the Council in their efforts to identify a 5 year housing land supply as required within the NPPF, we agree with the Council that there is an importance in ensuring that development does not come forward in a piecemeal fashion. As noted above, a "whole town" approach will be essential in order to ensure that development meets the long term needs of existing and future residents, particularly in respect of key infrastructure provision.<br><br>With regard to Non-Strategic Development outside of the proposed JSP SDLs, we make the following observations.<br><br>The SGLP as drafted follows the Strategy outlined in the JSP. However, given that the Plan has recently been submitted and will be the subject of an Examination in due course, it is important that the SGLP maintains sufficient flexibility to protect against any potential failings that may arise and thus ensure that sufficient land for housing can be identified to meet long term needs. If the JSP were to fail it is likely that further work will be required to address long term need within the SGLP, however, there are aspects of the SGLP, namely the approach to non-strategic development, which can already be recognised as providing a certain level of protection.<br><br>*Wider Policy:*<br><br>At this stage we do not have specific Comments on the detailed proposed Policy approach.<br><br>*Summary:*<br><br>As with the JSP, we are supportive of the approach proposed within the SGLP to identify Land at Engine Common as part of a wider North Yate SDL.<br><br>In doing so, we support the Council's intention to follow a co-ordinated approach to masterplanning and placemaking, taking a "whole town" approach to the settlement. We agree that there is a need to ensure that sufficient principles are established in order to avoid piecemeal development, albeit not overly tightly insofar as that might limit future development potential.<br><br>We would welcome the opportunity to engage in continued discussions on Policy formulation, particularly in relation to land promotion to support long term housing delivery. We would therefore ask that details are retained on record and that we are notified of any future Consultation events and/or exercises that may be held to inform the ongoing Policy formulation process.<br><br>If you have any queries relating to our Comments please do not hesitate to contact us. |
| **Attached documents** | Sydney Freed (Holdings) - Stride Treglown Limited (Mike Harris).pdf (2.4 MB) |

| | |
|---|---|
| **Respondent Name** | Hydrock Consultants Ltd and Mojo Active Ltd |
| **Comment ID** | 19740577/1789 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sir or Madam,<br><br>**South Gloucestershire Council New Local Plan 2018 – 2036 Consultation**<br><br>**Representations On Behalf of Hydrock Consultants Ltd** |

| | |
|---|---|
| | We write with regard to the above referenced New Local Plan Consultation (February 2018). This Representation is submitted on behalf of Hydrock Consultants Ltd ('Hydrock') and Mojo Active Ltd ('Mojo') and is made specifically in relation to the Over Court Farm site, Over Lane, Almondsbury. The site can be broken down into parcels as follows:<br><br>- Over Court Farm and Outbuildings ('Over Court Barns' comprising offices for Hydrock and Mojo).<br><br>- Land Around Over Court Farm (including Mojo facilities).<br><br>- Tall Trees (former gypsy and traveller site, currently used as a coach drop off for Mojo).<br><br>A Site Location Plan is appended to this Submission to identify the different elements of the site.<br><br>Hydrock is one of the UK's leading multi-disciplinary Engineering cCnsultancy and specialist remediation contractors providing services for construction, infrastructure and the environment throughout the UK. Hydrock is headquartered at Over Court Farm, Over Lane, Almondsbury with over employees nationally. The business has been established at this site for over years and is an important employer in the area. Over Court Farm comprises a number of former farm buildings, which have been converted to provide office accommodation for Hydrock. This includes Over Court Farmhouse, which is a Grade II Listed Building. Extensive investment in Over Court Farm throughout this period has provided high quality office accommodation within the setting of the existing Listed farmhouse.<br><br>Mojo Active Ltd ('Mojo'), an outdoor sport and leisure activity centre, is also headquartered at the Over Court Farm site. Mojo provides and encourages sport and recreation activities across a range of ages through teambuilding activities. The Mojo activities have been approved through a series of Planning Applications for an assault course, high and low ropes and archery on land to the South West of Over Court Farm.<br><br>Under the current Planning Policy Framework the site falls within the Green Belt, in the open countryside outside of a defined Settlement Boundary. The site falls within Flood Zone 1 (low risk of flooding).<br><br>The site's surroundings are characterised by commercial recreation uses at the urban edge of Bristol; the Bristol Golf Club falls to the South, alongside the M5 Motorway; the Wild Place Project, which is associated with Bristol Zoo is located to the South West; and a surfing lake ('The Wave') with associated recreation and campsite has recently been permitted by the Council to the North. In addition, Ibstock Brick Brickworks is located to the North East along Over Lane and a new operations base of the Great Western Air Ambulance is currently under construction at the M4/M5 Motorway Junction. Cumulatively these proposals have and will continue to change the nature of this urban edge to Bristol and this part of the Green Belt.<br><br>This Representation is submitted in response to the current Consultation on the New Local Plan Document.<br><br>**SOUTH GLOUCESTERSHIRE NEW LOCAL PLAN 2018 – 2036 (FEBRUARY 2018)**<br><br>Part 2 - New Local Plan Strategy for Development<br><br>Para. 2.3 – Proposed Spatial Strategy (Page 20):<br><br>The overall Strategy for development is supported including the four elements to meet the Joint Spatial Plan (JSP) Strategy. However, as set out in Policy 2 of the Submission JSP, Non-strategic Development Locations should account for housing and employment requirements, which should be evident in the South Gloucestershire Local Plan Spatial Strategy.<br><br>In addition, whilst an urban living approach is supported, we are concerned that the current Spatial Strategy does not take into account for intensification of key existing employment sites that do not fall within the 'urban areas' identified. As set out in Part 1, South Gloucestershire covers a range of environments comprising North and East Bristol as well as a large amount of countryside including the Cotswolds AONB and Green Belt land. Given the varying mix and nature of communities within the District, it is important that existing rural employment sites, such as Over Court Farm, are considered as part of the Spatial Strategy.<br><br>Equally, South Gloucestershire, particularly at the Northern edge of Bristol, benefits from a number of outdoor leisure, activity and sports facilities that are an important part of the local communities that they serve. Mojo in particular provides education, team building, learning and sport opportunities as well as jobs for this growing economic sector.<br><br>The Draft revised National Planning Policy Framework (Paragraph 83) is clear that Planning Policies should *"Set out a clear economic vision and Strategy which positively and proactively encourages sustainable economic growth"* and Paragraph 84 states that Planning Policies should enable *"… The sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings"* and *"Sustainable rural tourism and leisure developments which respect the character of the countryside."* Given the rural nature of parts of the District, we believe that the current Spatial Strategy does not enable the growth of businesses and leisure destinations in rural locations and would strongly recommend that this is reviewed within the next iteration of the Local Plan.<br><br>**Recommended Amendments:**<br><br>*4. Non-strategic development – smaller scale* ***housing and employment*** *development* ***and support for growth and intensification of existing employment and leisure sites*** *in our rural areas.* |
| **Attached documents** | Hydrock Consultants Ltd and Mojo Active Ltd - GVA Grimley Limited (Charlotte Taylor).pdf (238 KB)<br>Hydrock Consultants Ltd and Mojo Active Ltd - GVA Grimley Ltd (Charlotte Taylor).pdf (99 KB) |

| | |
|---|---|
| **Respondent Name** | W. J. Seale |
| **Comment ID** | 2802721/1831 |
| **Document Part Name** | Question 19 Other Comments |

| | |
|---|---|
| **Comment** | South Gloucestershire Local Plan 2018 - 2036:<br><br>I can find no reference in these proposals that relate to the 'not- spots' (lack of mobile phone coverage) in this area. This problem has clear business and personal implications (not unlike Broadband access - which is covered in the Document).<br><br>For an example of a personal difficulty with mobile coverage see the copy of an email I sent to Luke Hall below.<br><br>Luke Hall MP<br><br>I live in  and have no mobile signal at home.<br><br>Until now that's been inconvenient, but yesterday (12th June 2017) I had to call an ambulance to the house. The Paramedics needed to access Medical Records on their portable devices but were unable to do this because of the lack of a mobile signal.<br><br>Not life threatening in this case but potentially worrying.<br><br>Could you make the Government Authorities aware of this problem please - not just the lack of a mobile signal but the consequences when Paramedics are unable to use their portable computers.<br><br>Thank you. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Trevor Chambers |
| **Comment ID** | 19844737/1834 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sirs<br><br>**<u>Comments on parts of the South Gloucestershire Local Plan</u>**<br><br>This SGC Local Plan is premature in that the Joint Spatial Plan has yet to undergo its Examination in Public, and SGC cannot yet know what will be included. By the same token the document seeks to prepare the ground for an overlapping process of approval for Buckover prior to adoption of the Local Plan.<br><br>In my opinion, the JSP as far as South Gloucestershire is concerned is somewhat a joke. I believe that it is not based on a structured analysis of the housing, employment and transport needs of the residents as well as an analysis of the ability of the existing or proposed infrastructure to cope with these increased needs. Instead it appears to me to be an opportunistic and cynical attempt by a wealthy landowner, possibly in cahoots with his political chums on SG Council, to enhance his personal fortune to the tune of about £300million. Some might say that this is sheer greed masquerading as a public-spirited gesture. For the following reasons I object to the recently released SGC Local Plan.<br><br>**I believe that at least the Buckover Garden Village part of the plan must be rejected for the following reasons.**<br><br>**<u>It is undemocratic.</u>**<br><br>If approved, then I believe it would be a simple case of the wishes of a very wealthy landowner overriding the wishes of most of the residents of Thornbury just simply to enhance his personal fortune. This is not democracy. The PM has said that the economy must work for all of the population and not just some rich few. Agreement to the Garden Village would be totally at variance with this policy.<br><br>**<u>There isn't the Health and Education infrastructure.</u>**<br><br>The Garden Village being within 500 meters of the outer boundaries of Thornbury will effectively be considered a part of the town. The basic health and education resources of Thornbury are currently under increasing strain due to the substantial current building programme. They will be swamped if 3000 additional homes are approved. There is no mention that these facilities will be improved if the Village is given go ahead.<br><br>**<u>There isn't the Transport infrastructure</u>.**<br><br>The proposed village will straddle the A38 road which would be the only means for the inhabitants to travel out of the village. Currently this road is subject to significant traffic jams at both the Falfield and Almondsbury junctions with the M5. There are no other ways out of the area except via Yate. Given current developments at Charfield, the Falfield junction simply cannot cope. Another3000 homes, with the implied additional 6000 to 9000 car users, relying upon the A38 as their main commuting route will simply produce grid lock for much of the working day. The plan makes vague reference to transport improvements such as the Metro, but this will require significant road widening schemes which are impractical simply because the existing roads are already heavily developed, widening will require many houses to be demolished.<br><br>How will the A38 be able to act as an alternative to the M5 if it runs through the middle of a 3000-home village?<br><br>**<u>Loss of prime agricultural land.</u>**<br><br>The propose site for the village is existing prime agricultural land. The loss of this land will result in a reduction in the ability of the Nation to feed itself and consequently will result in more food miles.<br><br>**<u>Destruction of the character of Thornbury</u>.**<br><br>Being within 500 meters of the NE boundary of Thornbury will result in an unbalanced layout of the town with new residents being several miles from the main facilities such as shops etc., consequently there will be many more car journeys needed to access these basic facilities, more pollution! |

| | |
|---|---|
| | Garden Village not solving the affordable housing needs<br><br>The concept of a garden village sound fine but it is almost certain that properties within the village will carry a significant price premium. How is this going to solve the shortage of affordable housing.<br><br>**Not consistent with National Global Warming commitments**<br><br>The loss of prime agricultural land plus the significant increase if traffic pollution from gridlocked vehicles will only add to the National emissions.<br><br>**THERE ARE THE ALTERNATIVES?**<br><br>I believe that the following alternatives should be considered.<br><br>**Relocate to other more suitable areas**.<br><br>A. For example, Cromhall is a suitable candidate for this scale of development, so far it has escaped any major building development.<br><br>B. Relocation to somewhere along the A4174 ring road would make much more sense. The improved road access plus the planned introduction of the Metro bus make this a much more viable location.<br><br>**Disperse the homes around the many small villages in SG**<br><br>Instead of one large 3000 home development we should instead take a much more diverse approach and have much smaller developments at every village within S Gloucestershire. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | E. R. Pemberton |
| **Comment ID** | 1997473/1845 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **fully support the Comments and Report submitted by TRAPP'D (Thornbury Residents Against Poorly-Planned Development).**<br><br>I have chosen not to Comment in detail on this so-called Plan as it is not what I recognise as a Plan. It appears to be a long-winded series of bland statements and assumptions designed to support some predetermined conclusions and, possibly, personal ambitions. It appears to be part of an orchestrated attempt to steer conclusions in favour of Buckover Garden Village and other excessive house building.<br><br>This so-called Plan goes to great lengths to describe problems/challenges but then suggest "solutions" that will merely worsen those same problems. In particular, this includes further overstressing infrastructure, increasing congestion, increasing pollution and CO2, inflicting yet more damage on the natural environment, and blighting yet more arable land. The motivation for all of this seems to be greed rather than need.<br><br>It contains several dimensionless and irrelevant questions, including trivia about travellers' sites but fails to ask objective questions about substantive issues.<br><br>It is premature in that it fails to take into account the disgraceful Draft JSP. The Approved JSP should form the basis of the Local Plan.<br><br>It does not follow official guidelines for Plan preparation.<br><br>It does not satisfy the need to properly address the true housing and infrastructure needs.<br><br>In advance of any proper, objective, and unbiased examination it appears to approve of the outrageous and utterly inappropriate so-called Buckover Garden Village Plan. What personal agendas are at work here?<br><br>The supposed need for housing seems to be supported by, at best, out-dated or inaccurate economic forecasts and contrived adjustments to support Buckover and, possibly, other developments.<br><br>The Plan fails to provide anything that satisfies any definition of *sustainable* be it the NPPF's, common sense, or logical. I believe this Plan fails to comply with statutory requirements. I believe it should be scrapped and rewritten after the JSP is examined and either Approved or not. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Melanie Lindsley - The Coal Authority |
| **Comment ID** | 17730817/1858 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **South Gloucestershire Council - New Local Plan – Consultation** |

| | |
|---|---|
| | Thank you for your notification received on 9th February 2018 in respect of the above Consultation.<br><br>I have reviewed the Document, and the Questions asked, and can confirm that at this early stage the Coal Authority has no specific Comments to make at this time. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Louise Powell - Thornbury Town Council |
| **Comment ID** | 19845857/1863 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **South Gloucestershire Local Plan 2018 - 2036 – Publication Document Consultation**<br><br>**<u>Planning for the Future - Sustainability:</u>**<br><br>The vision for the West of England to be one of the fastest growing city regions in Europe is unnecessary for it to be prosperous and the focus should be on creating sustainable, equitable and liveable communities, with quality jobs and employment opportunities rather than speed of growth. The Local Plan follows the JSP and focuses on how to provide more and more housing and employment and totally lacks any detail about how the local environment will be managed and protected. More needs to be done to address issues relating to and mitigation for congestion, air quality, flooding, infrastructure delivery and preserving our most productive land and landscape character for the vision outlined to be sustainably achieved.<br><br>**<u>Thornbury as a Strategic Development Location:</u>**<br><br>We continue to have concerns about the sustainability of jumping the Green Belt particularly to connect new homes with existing employment areas. More of a focus needs to be given to meeting and supplying housing demand closer to urban areas which provide better links to employment and transport infrastructure than poorly connected outlying areas such as Thornbury.<br><br>Proposals to develop significant new housing in Thornbury and other neighbouring areas contradict these strategic priorities and vision. Whilst we recognise that some housing development in Thornbury could be sustainable, we would challenge the housing numbers proposed as being too high, as the percentage increase in population will bring huge pressures onto the existing community that will be difficult to mitigate against.<br><br>There continues to be a contradiction to the statement that locations are preferred which minimise the need to travel. This will not be the case, as Thornbury is located on the outer edges of the Green Belt with long commuting distances and times due to the lack of local employment opportunities and inadequate transport infrastructure.<br><br>A possible extension of the MetroBus and the other transport measures outlined to serve the developments in the Thornbury area are totally inadequate to meet existing issues let alone pressures from new development. There are no assurances of how other local infrastructure and service improvements (health, education, parking, utilities, etc) needed to meet such a rapidly growing population can be delivered. Walking and cycling distances from the proposed housing locations are outside sustainable walking and cycling distances to access the Town Centre and other local services.<br><br>Thornbury has already seen rapid growth in the last two years and the infrastructure is already suffering significantly. There are already significant congestion issues being experienced and the A38 is already struggling to support the increase in traffic caused by existing development. It would appear that the Local Plan offers no solutions to this and instead will open the flood gate to more housing development which will add to this strategic transport problem.<br><br>Whilst the Town Council is keen to see new areas of employment land allocated, the 5 hectares of employment land identified for Thornbury at Crossways is not integrated with existing employment areas in the town and is poorly located in a rural edge of town setting and this use is not supported by the landowner.<br><br>We have no confidence that the timescale for the delivery of any new potential infrastructure will tie in with development timescales, leading to increased issues and harm to existing communities. The lag between development and infrastructure delivery makes significant new development in the Thornbury area unsustainable with the negative consequences far outweighing any potential benefits even if funding is secured. No Permission for strategic sites should be granted unless it is a Condition and legally secured that the necessary infrastructure contributions have been found and appropriately timed to coincide with construction starting.<br><br>**<u>Buckover Garden Village:</u>**<br><br>The close proximity of the proposed Buckover Garden Village to Thornbury and its potential impact on the town continues to raise significant concerns.<br><br>The size and importance of this strategic development site and its contribution to the overall housing supply places significant risk if this development cannot be delivered. It is therefore particularly concerning that there are no details as to how the major barriers to delivery set out for |

| | |
|---|---|
| | this strategic site will be realistically addressed or overcome. Significant investment will be necessary to make the improvements required to both the local and strategic Highway Network, as well as drainage and utilities to ensure that this development is sustainable and deliverable, without any indication or assurances of whether this is even possible.<br><br>The Strategic Gap proposed between Buckover and Thornbury is already under pressure through existing Planning Applications and will do little to prevent the coalescence of the two communities, just a field apart from each other. This close proximity will place significant pressure on the existing Thornbury community and infrastructure.<br><br>On these grounds Thornbury Town Council considers that the South Gloucestershire Local Plan 2018 - 2036 is unsound and formally objects to its adoption in its current form. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ann O'Driscoll - North Bristol SusCom Ltd |
| **Comment ID** | 7256769/1864 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **South Gloucestershire Council Local Plan Consultation**<br><br>North Bristol SusCom Ltd. is a group of leading employers, located in North Bristol, promoting sustainable commuting to our employees, students and many visitors. We have been working together, for a number of years, to influence and improve local sustainable transport provision to combat traffic congestion and reduce the impact upon our environment.<br><br>North Bristol SusCom is submitting this Response to the South Gloucestershire Local Plan Consultation on behalf of our collective membership. This Response does not reflect the view of any individual business member but has been pulled together through discussions our members have held at our regular meetings, through the work we have done to produce our Group Travel Plan and the issues raised by our members and their employees through the Annual Travel to Work Surveys.<br><br>We have already submitted some Online Responses to the South Gloucestershire Local Plan Consultation Questions. However, there are a number of points we raised as part of the Joint Spatial Plan (JSP) and Joint Transport Study (JTS) Consultations that we think are worth noting again here as they are also very applicable to the South Gloucestershire Local Plan. These points relate to:<br><br>**1. Severn Crossings – Toll Removal.**<br><br>**2. Strategic Development Locations.**<br><br>**3. Regional and Orbital Connectivity.**<br><br>**1. Severn Crossings - Toll Removal:**<br><br>Since both the JSP and JTS were produced, the Government has announced it will be removing the Tolls on the Severn Crossings by the end of 2018.<br><br>We believe the JSP, the South Gloucestershire Local Plan and the JTS/Joint Local Transport Plan 4 all need to take into account the likely impacts this decision will have on the West of England Housing Market, the South Glos Travel to Work area and the West of England transport infrastructure.<br><br>With the tolls removed, lower house prices in South Wales and large numbers of jobs being created in Avonmouth/Severnside, Filton and Emersons Green Enterprise Areas - we are expecting to see an increase in the number of people choosing to live in South Wales and commute to the North Fringe.<br><br>Growing numbers of our member's employees have already been attracted to live in South Wales due to lower house prices but have regularly complained about the costs of the Severn Bridge Tolls and the lack of sustainable transport options (or the high cost, lack of capacity, poor frequency in existing sustainable transport options) for their commute to North Bristol.<br><br>There is currently little or no modelling data available to understand what the traffic implications of 'no Tolls' will be on our already congested road infrastructure. There is also no plan nor funding in place to improve sustainable transport connectivity between South Wales and the West of England to mitigate any increase in traffic.<br><br>The South Gloucestershire Local Plan needs to understand the implications the decision to remove the Tolls will have on South Gloucestershire and help mitigate against any negative increases in traffic and congestion. It must also consider how we can work with colleagues in South Wales to improve sustainable transport connectivity between our two areas.<br><br>**2. Strategic Development Locations – Green Belt vs. Transport Focused Development:**<br><br>We know from our engagement with businesses and from the annual Travel to Work Surveys, that employees who have sustainable transport options connecting where they live to where they work are more likely to travel more sustainably, more often. A huge amount of the congestion we currently suffer in the West of England is from a lack of investment in sustainable transport infrastructure over a long period of time. This is now starting to change but a significant proportion of measures identified in the JTS are to deal with current infrastructure deficits. Therefore, we need to ensure that we do not make the same development mistakes we have in the past. |

| | |
|---|---|
| | In the earlier public Consultation on the JSP, Issues and Options 2015, the Councils concluded that "most Respondents considered the best Spatial scenario for the West of England area to encompass Transport focused development and protection of the Green Belt." We and others argued, that transport focused development and protection of the Green Belt were often incompatible and conflicting priorities. Yet it appears that the Assessment of Strategic Development Locations (SDLs) gave much greater weight to the protection of the Green Belt at the expense of transport focused development.<br><br>The JTS and JLTP4 are aimed at increasing the use of sustainable transport – the transport proposals for many of the SDLs that jump the Green Belt are not sustainable in transport terms. The mitigations, improvements proposed for those outer SDLs are very road reliant (new roads, drive to a Park & Ride) or limited in scope and will lead to increases in car based journeys which is not sustainable and very much repeats the mistakes of the past.<br><br>The SDLs that jump the Green Belt will require significant investment above and beyond those proposed in the JTS to become more sustainable. Their poor proximity to major employment locations means that they are unlikely to achieve the level of sustainability required to meet the targets identified in the JTS to limit the growth in car journeys.<br><br>**3. Regional and Orbital Connectivity:**<br><br>The JTS should have done more to address transport connectivity beyond the geographic boundaries of the West of England with better Public Transport/Transport Interchanges at key locations in South Wales, Wiltshire, Gloucestershire and Somerset. This has become even more important now the Tolls are being removed from the Severn Crossings.<br><br>South Gloucestershire, in particular, attracts people from a wider travel to work area because of its proximity to the M4/M5 and M32 Motorways. We need to think how we can best continue to attract the talent our businesses and economy need to grow but we also must ensure we can help them travel by public and mass transport options.<br><br>We look forward to discussing these points further with you. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mr. and Mrs. Drew and Mrs. S. M. Bennett |
| **Comment ID** | 19722081/1883 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **Question 3 - Non-Strategic Growth:**<br><br>You will be aware from previous Submissions I have made, that I act for the owners of Land at Cromhall, whereby Representations to promote its development as part of proportionate growth to the village have been made as part of the adoption process for the Policies, Sites and Places Development Plan Document and the Emerging West of England Joint Spatial Plan (JSP) process (Site Reference: SG121).<br><br>Paragraph 2.8 of the Local Plan Consultation Document (LPCD) states:<br><br>*The rural areas in the rest of South Gloucestershire have not had any planned new housing, over and above infill within existing Settlement Boundaries, for many years. However, the JSP has identified the need for an additional element of smaller scale development which will require us to reconsider this approach. This will provide increased choice of new homes and support existing and new services and facilities to help our communities thrive.*<br><br>Thereafter, the following Strategy Objective is set out:<br><br>*The fourth element of our new SGLP Strategy is to identify where new small scale development should be delivered in our rural areas. The JSP has identified a need for 1,300 new homes in the rural areas of South Gloucestershire. The JSP also proposes a potential additional contingency of 500 new homes which, only if required, will be considered for release through the process of 5 yearly Plan Reviews from adoption.*<br><br>Paragraph 2.9 of the LPCD makes clear the, *"SGLP Spatial Strategy will deliver the 32,500 homes required for this area up to 2036"* and an important element of the Strategy will be, *"Delivering smaller scale development across the rural areas."*<br><br>Paragraph 2.47 of the LPCD deals with the concept of Non Strategic Growth Sites in South Gloucestershire to meet the need of 1,300 homes in the rural areas and states:<br><br>*"The new Local Plan will need to set out a Strategy to accommodate this level of growth within selected rural communities in South Gloucestershire. This potentially includes rural areas adjacent to the urban edges. The new Local Plan will then need to identify allocation sites to ensure delivery and provide certainty of where the growth will take place."*<br><br>Thereafter, Paragraph 2.51 of the LPCD states:<br><br>*"Non-strategic growth by definition will not be of a scale that would lead to a strategic change of a rural place, for example changing small villages into very large villages or new towns. The Council is seeking proportional growth of its existing villages, settlements and rural places, which provides the benefits of growth without significant harm, or loss, of built and natural assets. Proportional growth will differ from place to place, based on a number of factors."* |

| | |
|---|---|
| | *Appendix 1 of the LPCD sets out which initial places have been included for further investigation for non-strategic growth, and those which have not. Paragraph 2.69 sets out three Options for Rural Places that can accommodate growth:*<br><br>*• Option 1 – Rural Places outside the Green Belt.*<br><br>*• Option 2 – Rural Places inside the Green Belt.*<br><br>*• Option 3 – Rural Places Both Inside and Outside the Green Belt.*<br><br>*Cromhall is specifically identified as a village for potentially accommodating growth, and falls within an Option 1 site.*<br><br>*Having set out the above context I will now set out the various parts of Question 3 and respond accordingly.* |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tony England |
| **Comment ID** | 20208833/1910 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Please see Representations Document enclosed. |
| **Attached documents** | Mr. Tony England - Barton Willmore.pdf (12.5 MB) |

| | |
|---|---|
| **Respondent Name** | Catherine Brabner-Evans - Woodland Trust |
| **Comment ID** | 16617089/1925 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **Woodland Trust Submission**<br><br>**South Gloucestershire Local Plan Review Consultation**<br><br>As the UK's leading Woodland Conservation Charity, the Woodland Trust's vision is for a UK rich in native woods and trees, for people and wildlife. We work to protect, restore and create native woods, trees and their wildlife for the future. We manage over 1,250 sites, including over 200 sites in the South West, and have  members and supporters.<br><br>We welcome the opportunity to Comment on the South Gloucestershire Local Plan Review and are pleased to be working in partnership with you to protect and increase the canopy cover across the area.<br><br>The Woodland Trust believes that, in the context of high levels of proposed housing growth, it is essential to protect our existing woods and trees, particularly irreplaceable ancient woodland and aged and veteran trees outside woods. Also to maximise the opportunities for integrating trees into new developments and create new woodlands as part of the green infrastructure offer. This is particularly significant in South Gloucestershire which would benefit from investment in its street trees and its wooded green spaces, and which has areas of irreplaceable ancient woodland that would benefit from woodland creation to extend, buffer and protect and to promote Biodiversity and connectivity.<br><br>**The Vision:**<br><br>We welcome the commitments that the South Gloucestershire Local Plan aims to achieve 'protection of [..] valuable natural assets' and 'Delivery of [...] much improved green and public spaces required to maintain liveability alongside growth.' In addition to this we would like to see an explicit commitment in the vision to protect and increase the tree canopy cover across South Gloucestershire with a clear and ambitious target.<br><br>**Part 1:**<br><br>The Woodland Trust welcomes the emphasis on sustainable development and the recognition of the need for 'protecting and enhancing' the natural environment. In particular we support the inclusion of 'enhanced green infrastructure' and 'environment, Climate Change and Flood Risk' as key priorities which the Local Plan is seeking to address.<br><br>The Woodland Trust believes that trees and woods can deliver a wide range of benefits for placemaking for local communities, in both rural and urban settings, and this is strongly supported by current national Planning Policy. Woodland creation is especially important because of the unique ability of woodland to deliver across a wide range of benefits:- These include for both landscape and Biodiversity, for enhancing wellbeing and quality of life, for the local economy (making areas more attractive and supporting sustainable development) as well as a range of environmental benefits such as improving air quality. |

| | |
|---|---|
| | Trees & woods can play a significant role in sustaining the landscape scale connectivity that underpins ecological resilience and helps combat Climate Change effects. Protection of irreplaceable ancient and semi-natural woodland, restoration of degraded ancient woodland together, plus the addition of new and diverse woodland creation to buffer and extend our depleted and fragmented habitats can all significantly help resilience.<br><br>**Part 2:**<br><br>The Woodland Trust strongly supports proposals to develop a linked GI Network and to increase tree canopy cover. We believe that this ambition should be set as a target within the overall vision for the Local Plan.<br><br>We welcome the focus on '*identifying opportunities for investment in [..] urban tree stock*' and support the multiple references to protecting, maintaining and planting street trees for their amenity, health and environmental value.<br><br>Street tree have been shown to have a range of environmental benefits which contribute to Climate Change resilience:<br><br>o Urban trees reduce the 'urban heat island effect' of localised temperature extremes.<br><br>o They provide shade, making streets and buildings cooler in Summer.<br><br>o They help remove dust and particulates from the air.<br><br>o They help to reduce traffic noise by absorbing and deflecting sound.<br><br>o They help to reduce wind speeds.<br><br>o By providing food and shelter for wildlife they help increase Biodiversity.<br><br>o They reduce the effects of flash flooding by showing the rate at which rainfall reaches the ground.<br><br>o When planted on polluted ground they help improve its quality.<br><br>**Part 3 Policy Discussion Points:**<br><br>The Woodland Trust would like to see South Gloucestershire Council maintain and integrate a dedicated Policy for Trees and Woodland within the Local Plan. Further we would encourage South Gloucestershire Council to back up this Policy with a specific Trees and Woods Strategy. Good practice guidance for Local Authorities on developing a Trees and Woods Strategy can be found here and we are able to provide advice and Policy support for this locally.<br><br>We believe that there is scope for increasing South Gloucestershire's woodland cover significantly to achieve greater economic, social and environmental benefits and we would welcome the opportunity to support delivery of this objective.<br><br>In addition to a strong commitment to increase tree cover across South Gloucestershire, it is critical that the irreplaceable semi natural habitats of ancient woodland and ancient and veteran trees continue to be absolutely protected. It is not possible to mitigate the loss of, or replace, ancient woodland by planting a new site, or attempting translocation. Every ancient wood is a unique habitat that has evolved over Centuries, with a complex interdependency of geology, soils, hydrology, flora and fauna. This requires absolute protection in accordance with emerging national Policy.<br><br>We hope you will take these Comments into consideration as part of the Consultation process and that the examples and Document references contained herewith are useful for Policy development.<br><br>If you have any queries, please do not hesitate to get in touch via this email address governmentaffairs@woodlandtrust.org.uk. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Georgina Clampitt-Dix - Wiltshire Council |
| **Comment ID** | 19831969/1926 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sir or Madam,<br><br>**South Gloucestershire Local Plan Consultation Document**<br><br>Thank you for the opportunity to comment on the South Gloucestershire Local Plan Consultation Document. Wiltshire Council has commented on the Draft West of England Joint Spatial Plan (JSP) and it is the role of the Local Plan to implement this wider Strategy. Our Comments on the JSP, in so far as they affect South Gloucestershire, should be taken into account as you prepare the Plan. That said, the evidence does not suggest strong functional links across our Local Authority boundary. The Swindon and Wiltshire Strategic Housing Market Assessment notes only a very small amount of overlap between South Gloucestershire and the neighbouring Chippenham Housing Market Area.<br><br>Wiltshire Council has no Comments to make on the development of the South Gloucestershire Local Plan at this stage, but would like to be kept informed of further progress and would, of course, look to agree a Statement of Common Ground with your Authority in due course. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Helen Bone - West of England Community Homes (WECH) |
| **Comment ID** | 20147425/1929 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **Response from West of England Community Homes to South Gloucestershire Local Plan Consultation April 2018**<br><br>**1. About West of England Community Homes (WECH):**<br><br>WECH is a new regional "hub" established to support and enable a vibrant, sustainable and growing community-led Housing Sector across the West of England.<br><br>Our vision is that the people of the West of England live in homes not houses, communities not streets. That houses are treated as homes not investments. That housing is affordable, and environmentally sustainable for all people regardless of background, wealth, culture. That communities are rich in social financial and environmental capital that make them safe, healthy, equitable, fair, resilient, and give people choices and hope.<br><br>WECH supports existing and new groups, we provide a consistent voice for the CLH Sector and we work with a range of partners, including Local Authorities on strategic and operational priorities to help unlock the potential of Community Led Housing.<br><br>**2. What is Community Led Housing?**<br><br>The current Draft of the Local Plan does little to support Community Led Housing (CLH) in South Gloucestershire. A starting point for improving support would be an agreed definition of Community Led Housing that all parties can work with. A suggested and well used definition is included here.<br><br>Community Led Housing is residential accommodation and ancillary space and facilities developed and/or managed by local people or residents, in not for profit organisational structures. The range of models that can be adopted for providing CLH includes Self-build housing, co-housing, co-operatives, mutual housing, tenant-controlled housing, and Community Land Trusts (CLTs).<br><br>The Building and Social Housing Foundation's (BSHF) criteria for projects to qualify as CLH are:<br><br>• Community integrally involved throughout the process.<br><br>• Community groups/organisation taking a long term formal role in stewardship of the land and the homes.<br><br>• Benefits to the local area and or community of interest must be clearly defined and legally protected in perpetuity.<br><br>CLH can involve new build, Self Build, regeneration and the use of existing buildings. CLH groups may involve members from the same geographical area or members with a shared community interest or common link (e.g. Refugees, Older People, LGBT). The latter are often known as 'intentional communities.'<br><br>There are three main ways in which community-led groups become involved in the CLH process as set out by the Building and Social Housing Foundation:<br><br>**Group Led:** Grass roots groups respond to local housing need or demand, or people decide to develop their own homes.<br><br>**Extension of Community-based Activity:** Existing community-based organisations with local roots decide to provide housing in addition to their current activities.<br><br>**Developer-Community Partnership:** A Local Authority, landowner, Housing Association or small builder which wants to provide housing that benefits the local area in perpetuity, draws on community-led housing expertise to recruit 'founder members' from within the community and support them to take over ownership, stewardship and/or management of the homes.<br><br>**The Case for Community-Led Housing:**<br><br>The following is an extract from the Smith Institute Report Local housing, community living: prospects for scaling up and scaling out Community-Led Housing (2016), which sums up well the multiple benefits of Community Led Housing over more mainstream approaches to market or Affordable Housing delivery:<br><br>Survey evidence for the DCLG from 2013 suggests that support for new homes from local residents is higher where local people have more control over what is built, where community participation in the Planning process is introduced, and where design of new homes is considered to be of high quality.<br><br>Community-Led Housing offers a sense of community and locality, as well as:<br><br>● A belief in accountability to those who have to live with the outcomes of housing activity;<br><br>● A commitment to innovation in design and Planning; and<br><br>● A belief that housing should stand within a broader community context and that housing activity should be part of a wider conception of social benefit. |

According to the Building & Social Housing Foundation: Community-Led Housing stands apart from other forms of supply as by definition it represents a genuine reflection of demand – homes people have invested a personal interest in, ensuring satisfaction; that are not imposed on them, ensuring support; and that they are providing in their own back yard, ensuring quality.

Benefits of Community-Led Housing *

● Affordable Housing for local people.

● Improved quality of housing stock through the renovation and reuse of existing buildings.

● Improved affordability through low-Carbon housing, reducing utility and energy costs as well as lessening the impact on Climate Change.

● Community ownership of assets and retention of local wealth, enabling access to further funding.

● Support for local supply chains and improving the skills and employability of local people.

● Strengthened communities with increased confidence, capacity and control.

* Source: Building & Social Housing Foundation

Locality claims that there is well documented evidence of high levels of satisfaction with co-operatively managed homes, with approval ratings of services in the region of 90 per cent, providing a favourable comparison with the mainstream Social Housing Sector.

**3. A Community Led Housing Policy for South Gloucestershire Council (SGC):**

WECH is already working with Bristol City Council to help it develop a Community Led Housing Policy for the City. We would like to offer this same support to South Gloucestershire. We believe that a successful Community Led Housing Sector in South Gloucestershire will help to achieve several key drivers set out in the Local Plan and in particular:

● Places that perform to a higher status economically, socially and culturally, where people want to live, work and invest in by choice.

● Opportunities for intervention by the Council where the market is unable to bring forward the development.

● Stronger focus on regeneration to realise the development potential of Brownfield sites in urban areas.

● Delivering high quality strategic growth in new neighbourhoods.

● New small-scale development to meet the needs of rural communities.

**5. Potential for Community Led Housing to Help Deliver Wider Local Plan Aspirations:**

As well as affordability, the SGC Plan identifies other relevant key issues that CLH could help to address:

● Ageing Population.

● Need for a wider range of housing types and sizes.

● Issues of inequality.

● 6,000 new homes in Strategic Locations.

● 2,900 additional homes in urban areas – more and higher density around Town Centres, redevelopment of underused land and buildings.

● 1,300 new homes in rural areas.

● Providing housing for all.

● High quality design and health impact.

● Place making which encourages active and healthy lifestyles.

● Self and Custom Build Plots (while not mentioned in the current Local Plan Draft, these are the subject of Policy PSP42 Self-Build and Custom Housebuilding within the SGC Policies, Sites and Places Plan (PSP).

**6. WECH Response to the Local Plan:**

**Overall:** WECH would like to see a specific Policy that promotes, supports and privileges Community Led Housing (CLH) and recognises this as a way of delivering Affordable Homes. The SGC Local Plan Consultation Document has a Section on "Private Rented Sector (Build to Rent)" but no overarching Planning Policy approach to Community Led Housing. Whilst we support a target for Affordable Housing (35%) we would encourage SGC to incorporate additional support for CLH, which can deliver substantially more than these Policy targets. Some CLH schemes are successfully delivering 100% Affordable Homes e.g. Bristol CLT Fishponds scheme and Lyme Regis CLT.

**Proposal 1: Promotion of Exception Sites for Community Led Housing:**

Wide use has been made by rural Planning Authorities of Exception Site Policies, which provide opportunities for rural communities to promote Affordable Housing schemes on land that would not normally be acceptable in Planning terms, e.g. on agricultural land often outside of the Settlement Boundary. Such permissions produce an uplift in value from agricultural land prices but not to such an extent as would be created by an unfettered permission for market housing. They thus provide an incentive for landowners to offer land for sale while producing a supply of affordable land for community-led projects and a legal barrier to future speculative use.

Prioritising delivery of homes on exception sites through Community-Led Housing schemes where there is local demand and capacity is a valuable route to revitalising rural communities. For example, East Cambridgeshire District Council's SPD on Community Led Development has a presumption in favour of affordable CLH projects when considering proposals outside development envelopes.

The use of CLH as a delivery model on exception sites is likely to improve the Approval rate at the Planning stage, as it will be the local community driving the project forward rather than a developer or a Housing Association. The community has a vested interest in what is created near them, and often can be a significant opposition to external led development on exception sites. A Housing Policy which therefore enables the community to lead in the design and in the development using an interpretation of the Exception Site Policy, could increase the turnaround of new homes on smaller sites across the Council region.

We would like to propose undertaking work with SGC to map the potential for delivering Community Led Housing within rural areas on exception sites.

**Proposal 2: Supporting SGC to Work with Communities to Consider "Growth" in Rural Areas and the Role that CLH Can Play:**

As above, WECH would like to propose undertaking work in partnership with SGC to assess the potential for Community Led Housing as one of the routes for delivery of the 1,300 new homes proposed in rural areas. This Mapping could include looking at: opportunities, local housing needs, delivery mechanism, community capacity. This could include working with communities in some or all of the rural locations identified in Appendix 1 of your Consultation Ddocument. We think this could really help SGC develop positive and productive dialogues with these communities, through which communities could exercise more control over rural growth and be able to share in the benefits of local housing development (including local lettings/allocations).

**Proposal 3: Urban Exception Site Policy for Community Led Housing:**

The Smith Institute, funded through the Nationwide Foundation, investigated the growth and development of the Community Led Housing Sector, which resulted in a number of key recommendations. Some of these were around the role of Local Authorities and support for emerging groups.

*"Recommendation 7: The sector should work with Local Authorities on how to make Planning more accessible to community-led groups, bearing in mind their more limited access to support and resources."*

https://smithinstitutethinktank.files.wordpress.com/2016/01/local-housing-community-living.pdf

One of the ways Local Authorities can support in making Planning more accessible is to create a dedicated Policy for CLH along the lines of the Exception Site Policy for Affordable Housing. This would enable a clear procedure for groups to follow to enable them to create an affordable CLH housing project in an urban setting.

So far there have been few attempts to develop an urban model of an Exception Site Policy, but such an approach would have advantages in the urban areas in South Gloucestershire, where land of all sorts is in demand and where average prices for housing land can sometimes equate to £100,000 per plot and above. An Urban Exception Site Policy would therefore need to look at other classes of land where a Planning justification for permitting a Change of Use to residential development within an affordable, community-led framework might occur. Such instances might include underperforming or surplus open land e.g. within residential neighbourhoods where, size, position, need for remediation or lack of linkage to other open land limits Biodiversity and amenity value. There might also be sites with existing industrial uses where a tightly bounded residential permission could help to resolve historic 'bad neighbour' uses, or where the economic value of employment land could be enhanced with a residential element such as some live/work space or studio provision with accommodation above. Finally, there may be vacant and underused land in urban centres that would benefit from a community led approach given the sensitivity of their location and potential opportunities and threats.

**Proposal 4: Mechanism for Restricting Residential Land Use to Affordable, Community Led Development i.e. a New CLH Designation:**

As above, WECH would like to see how the Local Plan and associated Site Allocation Policies could be used to restrict land use to affordable community led development on some schemes. WECH would like to work with SGC to consider whether a Community Led Housing designation could be included in the Plan. We would also like to explore the role that a Supplementary Planning Document could play in helping to achieve this Policy goal through setting qualifications, expectations, criteria, and limitations (e.g. future sales).

The example sites in neighbouring Bristol - Arnside and Glencoyne Square (Southmead) and Bridge Farm (Eastville) - provide useful Case Studies where communities are showing a willingness to consider a Change of Use from open space, but only if there is a long-term stewardship and community benefit outcome. Communities often resist changes of use to residential if they are seen to fuel land speculation and private, poor-quality development with no long-term community benefits.

**Proposal 5: SGS to Broaden its Approach to Self-Build to Include Other Forms of Community Led Housing:**

WECH are pleased that SGC has successfully adopted a Self-Build Policy and employed a Self-Build Officer. However, we cannot see where this is referenced in the Local Plan or how the Local Plan will help deliver the Policy objectives. Community led schemes need to have sufficient scale (ideally between 10 and 100 units) to create community connections through a broader use mix including live/work units, shared communal facilities and green spaces. WECH would therefore like to explore with Officers how some of the Self-build opportunities that the Council is required to provide under the Self Build and Custom Housebuilding Act 2015 could be delivered under Planning Consents that require individual

| | |
|---|---|
| | units to be set within a community-based governance framework such as a Community Land Trust, that could ensure that community facilities are also provided and that land is stewarded for the local community for the long term.<br><br>**Proposal 6: Other Approaches to CLH Land Supply:**<br><br>WECH promotes the approach of incorporating CLH 'quotas' into the Approval Conditions on large residential proposals. This could be through Section 106 Agreements or direct requirements for developers to partner with CLH groups to deliver a percentage of CLH homes on their site. This would work well for SGC Strategic Development Locations.<br><br>**Proposal 8: Governance Framework for Windfall CLH Opportunities:**<br><br>WECH is working with Bristol City Council on a governance framework for land allocated for CLH uses to be 'held in trust' while potential user groups develop a business case for a scheme. We would welcome an opportunity to work in partnership with SGC to develop a model that would work for South Gloucestershire.<br><br>**Proposal 9: 'Light-Touch' Procedures and Other BCC Support for CLH Applications:**<br><br>WECH would like to see the establishment of a light-touch procedure for small sites and small groups which provides flexibility for CLH schemes. This could include free Pre-application Consultations and other dedicated SGC Planning Support for CLH projects. By way of example, the Greater London Authority has a way of fast tracking community led and Policy compliant Affordable Housing schemes. We would also like to see flexibility for CLH projects whose models do not necessarily fit well with current Policy and guidance. So, for example, community-led projects which propose smaller individual accommodation with communal facilities may not meet Space Standards unless the communal facilities are included. Similarly, different design priorities such as large windows (potential to be 6 overlooked), balconies, shared storage and waste collection, car parking etc may not fit Policy requirements because they are about a different more communal way of living.<br><br>**Proposal 10: Working with Communities and Partners:**<br><br>Before the next iteration of the Local Plan we would like to work with SGC to run a series of CLH awareness raising and capacity building workshops across the Local Authority area. This would be a way of identifying existing and potential new CLH projects. This information can then help inform the next iteration of the Local Plan.<br><br>This approach has been demonstrated to be successful in other areas - for example, in Chichester District a dedicated rural enabler has been promoting the benefits of CLH extensively to Parish Councils and communities. A Mapping exercise led to 26 initial Expressions of Interest, with eight committed groups now moving forward.<br><br>**7. In Conclusion:**<br><br>We would like to propose a meeting with SGC Planning Policy Staff to discuss the detail of this Response and the proposals within it, and to work collaboratively with SGC to develop Policies that can enable the CLH Sector in South Gloucestershire to expand and flourish. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Amanda Grundy - Natural England |
| **Comment ID** | 1410849/1933 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear ,<br><br>**Planning Consultation: South Gloucestershire Local Plan Consultation and Duty to Co-operate**<br><br>Thank you for your Consultation on the above dated 16th February 2018 which was received by Natural England on the same date.<br><br>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.<br><br>We have reviewed the Consultation Documents and offer the following Comments:<br><br>The South Gloucestershire Local Plan Consultation Documents seem to demonstrate a good understanding of existing issues facing the District and the likely challenges of meeting the development requirements set out in the Joint Spatial Plan. The Spatial Strategy being proposed to accommodate new development comprises five Sustainable Development Places, increased density in urban areas and non-strategic development in the remainder of the District.<br><br>This approach appears reasonable in the context of the JSP and national Policy.<br><br>The new Local Plan Document recognises the richness and variety of South Gloucestershire's natural environment, including its valued landscapes, heritage, ecology assets and ecosystems; it also acknowledges the pressures that new development will place on these resources. The proposed priority *to address issues relating to the impact of development and Climate Change* in relation to the natural environment is therefore very welcome.<br><br>The essential role of multifunctional green infrastructure as a component of sustainable development is well reflected through the Plan Document. |

| | |
|---|---|
| | We are pleased that the new Local Plan will require the preservation and enhancement of the GI Network and that this is to be an integral part of Planning for the SDPs, urban living areas and non-strategic development.<br><br>The Joint Spatial Plan (Policy 6) requires the preparation of a Joint West of England Green Infrastructure Plan, which will identify the strategic measures, mechanisms and monitoring to support the delivery of the environmental ambitions of the JSP and Local Plans, including mitigation for protected sites.<br><br>Green infrastructure should be planned and delivered at all Spatial scales and there is a need for a consistent and co-ordinated approach to this across Administrative Boundaries. We would like to see a clear reference to the WoE GI Plan in the new Local Plan and its essential role in achieving the strategic aims of the JSP, including providing net gains for the natural environment and Biodiversity.<br><br>o In addition to the merits of the Local Plan described above, Natural England believes the Plan could be further strengthened by inclusion of the following:<br><br>o Page 4, First Bullet. Include 'environmentally' as well as economically, socially, and culturally. Green infrastructure is referred to further down the page but the key aim of the Plan is to set a path for sustainable development and so the suggested change would reflect that.<br><br>o Page 17, 'Priorities for the new Local Plan.' We suggest inclusion of a bullet point that encapsulates the big opportunity for strategic thinking on the environment that has emerged through the JSP. Something like…. "Taking more strategic approach to environmental matters, seeking net gain from development and co-ordinating efforts to strengthen ecological networks, ecosystems and character across the District."<br><br>o SDLs, P. 50. There is a real opportunity and need to demonstrate high quality sustainable design and development at the SDL locations, including making them part of an environmentally resilient and attractive landscape. Good progress on this has been made through the JSP and GI Plan and we would like to see this taken into the preparation of the new Local Plan so that SDLs and new settlements become exemplars of sustainable development and strengthen ecological networks and other green infrastructure functions across South Gloucestershire.<br><br>**Sustainability Appraisal:**<br><br>The SA acknowledges that detailed assessment of Spatial Policies is not yet possible due to the early stage of the Plan process. It does not consider the potential effects of SDPs at this stage, but provides a high level appraisal of the potential effects of an urban living approach and non-strategic growth.<br><br>The SA has highlighted a range of issues and opportunities in relation to the Plan proposals and appears to have usefully informed the Plan. In light of the early stage of the Plan preparation, we consider the SA undertaken to date is proportionate and are satisfied that the Sustainability Objectives and assessment criteria should provide a robust framework for more detailed assessment as the Plan progresses.<br><br>**Habitats Regulations Assessment Statement:**<br><br>South Gloucestershire contains and is close to several European Sites. The JSP HRA identified likely significant effects on European sites and a range of mitigating measures were introduced. The HRA Statement does not seek to assess potential effects of the South Gloucestershire new Local Plan on European sites at this time, but sets out the process that will be followed as the Plan progresses and when more detail is available.<br><br>We would be pleased to input further into the SA and HRA in due course.<br><br>**Duty to Co-operate Statement and Proposed Approach:**<br><br>We are pleased that green infrastructure is included in the list of potential cross boundary issues and to note that this will cover strategic landscape designations and designated ecological sites, species and habitats. We would welcome a reference to the JSP requirement for the WoE Unitary Authorities to jointly prepare a West of England Green Infrastructure Plan.<br><br>For any queries relating to the advice in this letter please contact me. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Rachel Sandy - Highways England |
| **Comment ID** | 19831713/1937 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sir/Madam,<br><br>**SOUTH GLOUCESTERSHIRE LOCAL PLAN REVIEW - CONSULTATION FEBRUARY 2018**<br><br>Highways England welcomes the opportunity to Comment on the South Gloucestershire Local Plan Review. As you will be aware we are responsible for operating, maintaining and improving the Strategic Road Network (SRN), which in the Plan area comprises parts of the M4, M5, M32, M48, M49 and A46. It is on the basis of these responsibilities that the cCmments that follow in this letter have been made. |

We are generally interested in the potential traffic impacts of any proposals and/or Policies or development sites coming forward through the Local Plan and need to ensure that these are fully assessed during the Plan-making stage. It is imperative to identify any improvements needed to deliver aspirations at this early stage, which is set out in Government Policy. Paragraph 15 of DfT Circular 02/2013 states that:

*'In order to develop a robust transport Evidence Base [for Local Plans], the Agency (now Highways England) will work with the Local Authority to understand the transport implications of development options. This will include assessing the cumulative and individual impacts of the Local Plan proposals upon the ability of the road links and Junctions affected to accommodate the forecast traffic flows in terms of capacity and safety.'*

Paragraph 18 states that *'Capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan stage, which provides the best opportunity to consider development aspirations alongside the associated strategic infrastructure needs. Enhancements should not normally be considered as fresh proposals at the Planning Application stage. The Highways Agency(now Highways England) will work with strategic delivery bodies to identify infrastructure and access needs at the earliest possible opportunity in order to assess suitability, viability and deliverability of such proposals, including the identification of potential funding arrangements.'*

Undertaking suitable assessment of transport impact at the Plan-making stage avoids sites being chosen where:

• The traffic impact of the proposed development on the operation of nearby Junctions is not known; or

• Proposals for access or transport mitigation are untested and un-costed.

Responses to Local Plan Consultations are also guided by other pertinent Policy and guidance, namely the NPPF and the 'Highways Agency and the Local Plan Process' protocol – now applicable to Highways England.

Our Comments relating to the Prospectus, including the Key Priorities and Vision for the new Local Plan Topic Paper, are as follows:

Local Planning Context:

South Gloucestershire Council is working with Bristol City, Bath & North East Somerset and North Somerset Councils to prepare a Development Plan - the Joint Spatial Plan (JSP) which will cover all four of these Authority areas and set the strategic Planning context for the West of England. The JSP will set out the amount of homes and work places which are required in the area up to 2036, where they should go and why. It will also identify the key new infrastructure required to support this growth.

The new South Gloucestershire Local Plan (SGLP) covers the whole of South Gloucestershire and sets a Planning Framework for the period from 2018 - 2036. Importantly, it will follow on from the JSP and contain the detailed Strategy and Policies for delivering the development identified in the JSP.

Travel Accessibility:

The Consultation Document notes that South Gloucestershire has very good strategic road/Motorway links including the East/West M4(including M48 and M49 spurs to the Severn Crossings to/from Wales), North/South M5 as well as the M32 leading to/from Central Bristol, all of which connect with a network of locally strategic A Roads.

Highways England recognise that South Gloucestershire has very good access to the SRN, with both M4 and M5 passing through the Authority area. This means that many existing residents, and those that will locate in South Gloucestershire as a result of this Local Plan, either use or interact via Motorway Junctions with the SRN. Whilst this is beneficial for the economy, as many of these trips are not of a strategic nature, Highways England is mindful that additional trips may cause impacts on the SRN.

Highways England notes, and is pleased to see recognised, that the Consultation Document says that levels of car ownership and commuting are high and congestion hotspots are a significant problem on strategic and urban roads. The Consultation Document also says that investment in transport infrastructure has been insufficient to provide for the growing economy. Highways England has and will continue to work with South Gloucestershire Council and the other Authorities in the WoE to assess the impact of growth on the Highway Network and where possible secure funding for improvements that support sustainable growth.

Key Issues and Objectives for the New Local Plan:

Under Travel Accessibility, the issues of congestion and investment are noted. The priority for the new Local Plan is described as a need to address congestion and accessibility issues through a step change in the quality of our transport infrastructure, with the aim to provide for a programme of significant improvements to walking and cycling, Public Transport road and rail services, aligned to new development.

Highways England concurs with this and is keen to work with South Gloucestershire Council in developing a robust Transport Strategy for South Gloucestershire and for the wider West of England area.

| | |
|---|---|
| | New Local Plan Strategy for Development:<br><br>This Section of the Consultation Document sets out the overall Strategy for the area. South Gloucestershire Council has been working with the West of England Authorities to produce a Joint Spatial Plan (JSP). This has been developed through extensive public Consultation and will set out the overall number of homes and jobs required in the West of England to 2036. The number of homes for the West of England in the JSP Publication Plan November 2017 is 105,500 and the South Gloucestershire component of this is 32,500.<br><br>Strategic Development Locations:<br><br>Highways England has responded to Consultations on the JSP and commented regarding the proposed location of the major sites and the implications these sites have for the SRN. The JSP has identified larger scale strategic developments at Yate, Charfield, Thornbury and Coalpit Heath as well as a new Garden Village at Buckover. The sites at Charfield, Thornbury and Buckover have implications for the SRN, with Charfield and Buckover being close to M5 J14 and traffic from Thornbury wishing to access Bristol and/or the M5 will use the A38 and M5 J16.<br><br>Highways England will expect to see a Transport Assessment to support the new Local Plan which will establish the severity and nature of the impact of these sites on the SRN and allow demonstration of the benefits of the Mitigation Package.<br><br>Highways England has noted that there does not appear to be any mention of the Joint Transport Study (JTS) commissioned by West of England in the Consultation Draft. The JTS considered transport mitigation to address both existing issues and the Strategic Development Locations and employment growth identified in the Joint Spatial Plan. The JTS is cited as a Supporting Document to the JSP, and is thus a part of that Emerging Plan. However, the schemes and initiatives contained in the JTS Study are not referenced in the Consultation Draft. Highways England suggests that there should be reference to the JTS in the new Local Plan, as in transport terms, it is being put forward as key evidence for the JSP. The mitigation schemes identified in the JTS have been accepted by the Local Highway Authorities and Highways England. Highways England suggests that the JTS would go some way towards the development of the Transport Assessment that will be necessary to support the new Local Plan.<br><br>Strategic Policies:<br><br>Highways England notes that this Section contains a listing of intended Strategic Policies, which include Strategic Transport. These may impact on the SRN and thus be of interest to Highways England. It is noted that it is the intention that the Strategic Policies will be developed following the outcome of this current round of Consultation and progression of the Joint Spatial Plan. This, Comment on these Policies will be provided when the Policies have been proposed.<br><br>If you have any Comments or wish to discuss any of the above please do not hesitate to contact me. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Charlie Leflaive - Greenfield Gospel Hall Trust |
| **Comment ID** | 19937345/1938 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Comments re: Draft Local Plan:<br><br>Dear Sir/Madam,<br><br>We write briefly to highlight the urgent need for places of worship in South Gloucestershire to be made provision for in the Local Plan, as this appears to be lacking in the current Draft.<br><br>We have considered over 100 sites in recent years near to where the congregation now live. During this time, we have had several negative Pre-app Responses, and recently an Application had to be Withdrawn which involved a Change of Use of an existing building with our use being a much less intensive use than the current one. All these appeared to have good Planning prospects according to our Planning Consultants, and this exercise has obviously been costly to our Trust which is a registered Charity.<br><br>Our Gospel Halls are places of public religious worship and therefore open to suitably disposed persons who wish to hear the Gospel preached as well as the regular congregation and we currently have regular visits from those that are not members.<br><br>We would respectfully remind the Council of their obligations under the Public Sector Equality Duty (PSED) as required by Section 149 of the Equality Act 2010, where the protected characteristic is religion or belief and the decision-maker is obliged to consider how to ensure that the Local Plan Policies will remove or minimise any disadvantage suffered by those who hold our beliefs compared with those who do not.<br><br>We thank you in anticipation of your consideration of our urgent needs. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Matt Griffith - Business West Chambers of Commerce & Initiative |
| **Comment ID** | 19927649/1940 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **South Gloucestershire Local Plan Consultation**<br><br>**Business West Chambers of Commerce & Initiative Submission**<br><br>**Introduction:**<br><br>Business West Chambers of Commerce & Initiative is the main business representation and leadership organisation for the West of England. We have been working on behalf of businesses in the region for nearly  years and now represent nearly  businesses, from new start companies through to the major private and public employers. We are also members of the board of the West of England's Local Enterprise Partnership.<br><br>As a Chamber of Commerce we are not representing any specific business interests or sector, but are submitting evidence based on our independent view of the long term economic interests of the region and the whole spectrum of businesses who operate here.<br><br>We have previously made detailed Submissions to the West of England Local Authorities Joint Spatial Plan (JSP), upon which much of the framework for the South Gloucestershire Local Plan is based. This included independently conducted evidence and analysis in the areas of housing need and employment land provision.<br><br>We fundamentally recognise the importance of long term planning and the direct connection between housing supply, employment land and sustainable economic growth and strong communities.<br><br>We have long the four West of England Authorities to plan ambitiously for the long-term future in terms of housing, transport and employment and so very much welcomed both the Joint Spatial Plan and Joint Transport Study and the close working of the West of England Authorities that underpins this. We believe this is vital in order to successfully plan our future housing supply and secure our future economic growth needs.<br><br>We continue to have significant concerns with the JSP, in relation to its overall ambition for the region and its findings in relation to housing need and planned housing numbers, employment land and the sustainability of some of its chosen Spatial Locations. The South Gloucestershire Local Plan is an important opportunity to address these issues and adjust to weaknesses within the JSP.<br><br>**Spatial Location, Infrastructure and Sustainability:**<br><br>Business West Chambers of Commerce and Initiative and the wider business community strongly support the need for a strategic Plan across the West of England and the Vision and Strategic Priorities that underpin the current JSP.<br><br>We endorse the objectives set out in this South Gloucestershire Local Plan that the final Plan should be a blueprint setting out the ambition and trajectory for sustainable growth and it is vital that it lives up to the stated aims to support growth and to meet the challenges of the region.<br><br>We welcome the approach to Urban Living set out in the Plan. This needs to be mindful of the impact on employment land availability when deciding details and in balance between uses (see below section on employment land). Town Centre regeneration and the challenges faced by secondary retail locations are right to be focused on and examined further as options for regeneration and reuse.<br><br>However, we consider some of the Strategic Development Locations within this Local Plan to fall short of the sustainable development aspirations in the West of England's Plans, particularly the sustainability issues raised by the Spatial elements of these Plans.<br><br>As the Local Plan Document sets out, there has been a lack of investment in transport provision for both key radial and circular routes into and around the main employment centres of the city region.<br><br>For example:<br><br>o "The substantial levels of new development over the past half Century have not been matched by provision of essential physical and social infrastructure" (Page 12).<br><br>o "Congestion hotspots are a significant problem on strategic and urban roads. Investment in transport infrastructure has been insufficient to provide for the growing economy" (Page 12).<br><br>o "Severe congestion issues" (Page 16). "Lack of access to Public Transport options including to centres of employment" (Page 16).<br><br>We welcome this acknowledgement and the commitment to "make the best use of existing transport opportunities" (Page 21) contained in the Local Plan Documentation.<br><br>It is important that new development, particularly the proposed Strategic Development Locations, fully consider these transport and wider infrastructure issues when deciding whether these locations are sustainable and appropriate.<br><br>However, we do not believe that some of the chosen Strategic Development Locations sufficiently meet sustainable travel or infrastructure concerns or propose likely ways to overcome existing infrastructure shortcomings. |

We have particular concerns about existing congestion pressure, the Motorway infrastructure around the M5 and M4, on the A38 Transport Corridor and other key radial routes and access to key employment locations in South Gloucestershire.

These transport connectivity issues are substantial and long standing. As well as the pressure from additional housing and commuter journeys within the region, there will also be additional pressure from outside of the region on the local Motorway and local roads network of South Gloucestershire due to the removal of Tolls on the new Severn Bridge.

We are therefore concerned that some of the Strategic Development Locations in the South Gloucestershire Local Plan puts development too far away from employment centres, are not well aligned with existing transport infrastructure and are highly likely to exacerbate already strained Transport Networks.

We believe some of these current Strategic Development Locations will face significantly high costs to make them sufficiently sustainable, when compared to others which could have been reasonably included.

The conclusions of the West of England's Joint Transport Study made clear that a Strategy based mainly on the presumption of minimising changes to Green Belt around the urban core of the West of England does not accord with sustainable transport.

The descriptions of the strategic allocations outside existing urban areas and 'beyond the Green Belt' identify comprehensive transport challenges and mitigation requirements. The locations clearly need to be made sustainable, rather than being so already.

We believe some of Strategic Development Locations identified in the South Gloucestershire Local Plan are too far from employment markets, are not close to sufficient Public Transport infrastructure, or viable future Public Transport options, will generate too much traffic and the costs of mitigation for these locations is large compared to other available locations. This includes those Strategic Development Locations outside of the Green Belt.

**Employment Land:**

Having the right sort of employment sites in the right locations within the West of England region is vital for the future prosperity of the city-region and the employment opportunities available to local populations. Without appropriate availability of sites and premises we will be unable to attract inwards investment internationally or from the rest of the UK. Businesses currently in the city-region and seeking to relocate or expand will be unable to do so locally and are likely to move away.

Rising commercial property prices in the West of England risk reducing our competitiveness in relation to other key regional markets from London and the M4 and M5 Corridors, as well as weakening our position with the 'Northern Powerhouse' cities and Cardiff and South Wales – all of whom have aggressive Strategies to drive growth and attract both national and international inward investments and relocations. The West of England also faces growing international competition, given the global reach and supply chain structure of many of our region's key economic sectors.

We welcome the South Gloucestershire Local Plan's commitment that it will be "providing sufficient employment land" (Page 15) for the region's businesses.

Our city region is currently facing a shortfall in suitable employment space for growing companies – 'scale ups' - something that is being frequently highlighted to us by our tech, creative and SME members and partners. Our manufacturing, light industrial and goods firms also face challenges in finding suitable industrial land in well-connected locations.

We believe that the South Gloucestershire Local Plan needs to particularly consider pressure on office availability, especially scale up space for small and growing firms from where the majority of future employment growth and new sectoral growth may well come from. It is also important the Plan considers the importance of locations for light industrial, industrial and logistics businesses, which are of growing importance in the 'North Fringe' region, particular towns, such as Yate, and in the East of the Bristol conurbation.

We believe there are several major flaws in the Evidence Base on future employment needs and future employment land allocations that has been conducted by the West of England as part of the JSP: the Economic Development Needs Assessment (EDNA).We set out these flaws below.

Because of the weaknesses of the EDNA at WoE level, we therefore strongly encourage South Gloucestershire Council to carry out a more detailed Local Employment Land Study in order to understand the fine grain importance of local sites and how they will meet current and future demand. This is particularly relevant given the emphasis on Urban Living in the Local Plan.

**Implications from Weaknesses in the JSP's EDNA for South Gloucestershire:**

We believe there are several major flaws in the Evidence Base on future employment needs and future employment land allocations that has been conducted by the West of England as part of the JSP: the Economic Development Needs Assessment (EDNA).

At present the EDNA Document is currently the sole Evidence Base Document on employment land issues within the JSP. It is important therefore the South Gloucestershire Local Plan addresses these shortcomings.

The major flaws we identified, in relation to South Gloucestershire are:

1. The EDNA assumes that different types of employment land use are broadly interchangeable between different types of employment use (B1, B2 and B8 Use Categories). This approach assumes that, for example, if there is an increased requirement for office floor space, but a reduced requirement for industrial floor space, the overall requirement can be calculated as the additional requirement for offices, less the reduction in the need for industrial floor space. This approach assumes, in this example that land released from industrial use can, and will be, automatically re-used for office development. This is unsound.

| | |
|---|---|
| | o South Gloucestershire therefore needs to relook at the supply and demand calculations within the EDNA for B1a/b office and R&D uses and they need to be reassessed so that they are not made on a simple net basis, but on a realistic assessment of whether industrial sites and the areas in which those sites are located will be suitable for office use.<br><br>2. As well as the assumption of a rebalancing of Use Classes within particular geographically defined sub markets (see above), the JSP assumes that there will also be a rebalancing between geographically defined sub markets. This finding that it is possible to 'rebalance' undersupply in one part of the market within the West of England Area with oversupply in another we believe to have serious shortcomings. Business and market experience shows that one sub-market does not represent a ready substitute for another. The alternative for a business seeking to relocate to a particular sub market within the overall FEMA may not be an alternative within the FEMA but an alternative urban area elsewhere in the UK or internationally. This is particularly problematic for Bristol, as this is the area where the EDNA assumes under supply will be rebalanced by greater supply in other parts of the city region.<br><br>o We believe this flaw in the EDNA means there is a danger of underallocation of employment land for key markets within the Bristol City region, particularly in high demand locations in the North Fringe and key towns for employment such as Yate. We would recommend that South Gloucestershire conduct in its own employment assessment to consider whether greater employment allocations than set out in the JSP are needed in these locations.<br><br>3. The EDNA Study concentrates solely on 'B' Uses, despite the wider range of employment land use that present a real impact on employment land availability and within employment land markets. Pressure on employment land comes from both residential and the broad range of Non 'B' Class employment uses not covered by the assessment which make up an un-quantified but significant percentage of total non-residential demand. Examples of these Non B Class employment uses include student accommodation and education as well as other uses such as health, care, community use, parking, retail and leisure.<br><br>o The ability of these Classes to be an important part of employment land use will clearly have an "on the ground" bearing on total demand for employment land, and therefore South Gloucestershire needs to consider these properly in making its total calculations of future employment land allocations. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | H2 Development Management (Land to Rear of Mount Pleasant Farm, Longwell Green) |
| **Comment ID** | 20377281/1961 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Please see the attached Document. |
| **Attached documents** | H2 Development Management - Tetlow King Planning (Sean Lewis).pdf (5.4 MB) |

| | |
|---|---|
| **Respondent Name** | GPG Ltd |
| **Comment ID** | 20219361/1968 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **South Gloucestershire Local Plan Consultation/Call for Sites February 2018 (5th February - 30th April 2018)**<br><br>This Submission Statement comprises two sections. The first of which makes a number of general Comments about the need and ability of the New Local Plan (SGLP) to provide sufficient housing and employment opportunities within South Gloucestershire in the period 2018 - 2036 in line with the requirements already stated within the Joint Spatial Plan (JSP) and Joint Transport Study (JTS) on the basis of the four growth Strategies set out in the Draft SGLP.<br><br>Part 1: General Comments/Context:<br><br>We note in the preamble of the SGLP (Page 3), the Council acknowledges, "there has never been greater pressures on our urban and rural areas to accommodate additional housing and economic growth."<br><br>The housing requirement for South Gloucestershire as indeed for the four Unitary Authorities is dictated by the figures contained in the over-arching JSP whereby South Gloucestershire is required to provide 32,500 houses as its part of the 105,500 new houses covering the whole of the Unitary Authority area comprising South Gloucestershire; Bath and North East Somerset; Bristol; and North Somerset.<br><br>We note the SGLP sets out four scenarios in which this level of housing could potentially be achieved. These include:<br><br>1. Continue with the strategic growth sites identified in the Core Strategy including Emersons Green and Patchway together with progressing other strategic allocations through the Planning process at Harry Stoke, North Yate and Cribbs/Filton Airfield. Cumulatively these developments as identified in the JSP could deliver 22,300 new homes as well as new employment and supporting infrastructure.<br><br>2. The SGLP identifies additional growth under the JSP requirements that the existing urban centres will deliver a minimum of 2,900 dwellings. |

| | |
|---|---|
| | 3. There is an identified shortfall of 7,300 homes which is intended to be met by large scale developments at Yate, Charfield, Thornbury, and Coalpit Heath as well as a new Garden Village at Buckover (as identified in the JSP). These combined sources are intended to provide 6,000 mew homes and employment opportunities. There is also a proposed contingency (identified in the JSP) of 1,000 new homes South of Chipping Sodbury, if required and subject to ongoing 5 yearly reviews of the new Local Plan.<br><br>4. The final element will be provided by non-strategic development within the rural areas both within and outside the current Green Belt for approximately 1,300 new homes with an additional contingency of 500 (identified in the JSP) through an ongoing 5 yearly review of the new Local Plan.<br><br>In addition to the stated need to find additional housing land from new Strategic Locations, the Plan also recognises that up to 2,900 dwellings will be provided by allocations from the main urban centres which by definition must include the existing key towns and settlements within South Gloucestershire. In addition, some development will come forward through the development of non-committed sites where development opportunities arise either by the redevelopment of redundant sites or indeed where there is opportunity to increase densities on available sites within Settlement Boundaries by virtue of certain windfall sites which come forward over time. This is a long accepted additional element of housing land supply which is built into the Council's overall Housing Land Supply Strategy. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Severnside Distribution Land Ltd (SDLL) |
| **Comment ID** | 16468705/1990 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sir/Madam,<br><br>**LOCAL PLAN CONSULTATION DOCUMENT (FEBRUARY 2018 DRAFT) - RESPONSE OF SDLL CONCERNING THE CASE FOR HOUSING GROWTH AT SEVERN BEACH TO SUPPORT THE ENTERPRISE AREA**<br><br>I refer to the above and thank you for the invitation to Comment on the Local Plan Consultation Document.<br><br>*Background:*<br><br>This Response is made on behalf of Severnside Distribution Land Ltd (SDLL). SDLL is developing the strategic scale Central Park employment scheme at Severnside, which now includes the distribution operations of major national and internationally renowned businesses. The continuing success of Central Park, and the wider Enterprise Area, will be critical to the delivery of current and future ambitions for the region.<br><br>*The Case for Housing Growth at Severn Beach – JSP Representations:*<br><br>SDLL has previously made three formal Responses to the Emerging JSP (letters dated 26th January 2016, 15th December 2016 and 8th January 2018). These set out the case for defining Severn Beach as a new strategic housing opportunity area to complement and support the unprecedented growth in jobs at the Severnside Enterprise Area.<br><br>SDLL has specifically promoted the sites known as M and N, which lie within the '1957 Consent' area and can be developed, including land raising to bring them out of the theoretical Flood Risk zone (a Site Plan is appended). The sites could accommodate at least 300 dwellings and a Public House (a community aspiration expressed through our local Consultation exercises).<br><br>SDLL made similar Representations to South Gloucestershire Council's Local Plan 2018 - 2036 Prospectus Consultation (letter dated 23rd January 2017).<br><br>This letter continues to make that case and includes key updates on recent (April 2018) feedback given at Senior Council Director level, acknowledging the merits of the case for housing in this location, and through 'Pre-application' engagement with Senior Officers at the Environment Agency, who have confirmed that they consider there are technical solutions that could address Flood Risk.<br><br>Put simply, the scale of job creation at the Enterprise Area, and at Central Park in particular, is unprecedented. Thousands of new jobs have been created in a very short space of time and this trend will continue for some years, as the remaining Plots are built out. Whilst this is a great success in terms of inward investment, the real long-term success of the Enterprise Area and the region will depend on achieving genuine sustainable development. That requires new homes to support the new jobs.<br><br>This strategic issue has already attracted widespread commentary by, and concern to, the business community (unrelated to the Representations made by SDLL). As an example, in an article that appeared in the Western Daily Press on 19th August 2017, Mr. Tim Davies of Colliers International recognises the massive economic success of this area and astutely identifies the strategic housing issue it presents in terms of the need for homes to support the massive increase in jobs.<br><br>He states: *"If this issue is not tackled soon, there is a danger this strategically perfect location will have to contend with an imperfect labour situation in which it becomes increasingly difficult to fill vacancies, and employers will have to bus in their workers from places such as South Wales and the Midlands. This is an issue of huge significance for the local and regional economy and is something I would like to see Bristol's Mayor, Marvin Rees, and Tim Bowles, the new Mayor of the West of England Combined Authority addressing as a matter of urgency."*<br><br>Unfortunately, the Draft JSP does not address the issue. That omission is carried over and reflected in the current Local Plan Consultation Draft Document. The JSP Spatial Strategy, and its identification of 'Strategic Development Locations,' fails to recognise what is happening in the real world and the challenges and opportunities that are being faced by the success of the Enterprise Area.<br><br>It is simply illogical that the nearest planned strategic housing to support the Enterprise Area will be in Thornbury (12 kms to the North East), Coalpit Heath (13.7 kms to the East), Brislington (15 kms away on the South East side of Bristol) and Backwell (16 kms to the South). |

| | |
|---|---|
| | The Planning case for identifying a 'Strategic Development Location' at Severn Beach is compelling:<br><br>o It would support the Enterprise Area by delivering homes and Affordable Homes in the right location (not remote from it).<br><br>o It would promote and encourage sustainable travel.<br><br>o It would breathe new life into and revitalise the Severn Beach settlement, which has suffered over the years from the loss of shops and services, the closure of its only Pub and a Primary School that has faced some difficult challenges.<br><br>o It would respond to the wishes of the community reflected in SDLL's 2016 Consultation, where the overwhelming majority of the community supported a new housing option (rather than the fall back 1957 Consented warehouse development).<br><br>o It would maximise the benefits from the massive public investment in roads (including the new Motorway Junction) and the coastal Flood Defence project. |
| **Attached documents** | Severnside Distribution Land Ltd (SDLL) - PJS Development Solutions Ltd (Phillip Staddon).pdf (2.0 MB) |

| | |
|---|---|
| **Respondent Name** | Gary Parsons - Sport England |
| **Comment ID** | 2799105/2000 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sir/Madam,<br><br>Thank you for Consulting Sport England on the South Gloucestershire Local Plan Review to 2036 Document.<br><br>**Economic Value:**<br><br>In terms of the **economic value of sport**, Sport England has developed a tool that can demonstrate how sport benefits the local economy http://www.sportengland.org/research/benefits-of-sport/economic-value-of-sport/ The model produces area based estimates on sports' contribution to the local economy in the form of a business output Gross Value Added (GVA) and jobs plus wider benefits like health. Using the weblink above you can register to use the tool and access the guidance notes including FAQs.<br><br>Summary (see the attached 'Snapshot' Spreadsheet), using level 1 basic Snapshot of the tool (automatically generated overall view of the local sport economy indicating the contribution made by businesses and services supporting people playing sport plus the wider interests in sport):<br><br>• Total Direct Economic Value for Sport - **£82.6 million**<br>• Of which Participation in Sport - **£61.0 million**<br>• The wider economic value to health is **£112.6 million** although not directly linked to total direct value of sport. Please refer to the FAQs on the website.<br><br>Please see the attached Document for the missing Images.<br><br>In comparison with neighbour Authorities:<br><br>Please see the attached Document for the missing Table relating to the point above.<br><br>A refined Snapshot for South Gloucestershire is also attached for your information.<br><br>**Sport England and the Planning System:**<br><br>Sport England has an established role within the Planning System which includes providing advice and guidance on all relevant areas of national, regional and local Policy as well as supporting Local Authorities in developing the Evidence Base for sport. The Government's National Planning Policy Framework (NPPF) is clear about the role that sport plays in delivering sustainable communities through promoting health and wellbeing. As such, Sport England wishes to see local Planning Policies that seek to **protect**, **enhance** and **provide** for sports facilities based on robust and up-to-date assessments of need in accordance with Paragraphs 73 and 74 of the NPPF. Our Policies are also consistent with the current Consultation Draft NPPF. |

| | |
|---|---|
| | Sound policy can only be developed in the context of Objectively Assessed Needs, in turn used to inform the development of a strategy for sport and recreation. Policies which **protect**, **enhance** and **provide** for sports facilities should reflect this work, and be the basis for consistent application through Development Management. Sport England is not overly prescriptive on the precise form and wording of Policies, but advises that a stronger Plan will result from attention to taking a clearly justified and positive approach to planning for sport. In this way, Planning Authorities will be able to demonstrate that their Plan has been positively prepared (based on Objectively Assessed Needs in accordance with Paragraph 73 of the NPPF), is consistent with national Policy (reflecting the NPPF), is justified (having considered alternatives) and effective (being deliverable). Without such attention there is a risk that a Local Plan or other Policy Document could be considered 'unsound.'<br><br>Having viewed the Document, Sport England has the following Comments to make in the attached Table:<br><br>Please see the attached Document for the Table which is referenced above.<br><br>If you would like to discuss any of the above Comments further or require any additional information or advice please contact planning.south@sportengland.org. |
| **Attached documents** | Sport England (Gary Parsons).pdf (934 KB)<br>SGlos Refined Snapshot.xls (205 KB)<br>SGlos Snapshot.xls (198 KB) |

| | |
|---|---|
| **Respondent Name** | CEG . |
| **Comment ID** | 19925601/2005 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sir/Madam,<br><br>**South Gloucestershire Local Plan 2018 - 2036 Consultation**<br><br>**Representations On Behalf of CEG**<br><br>Lichfields is instructed by CEG to submit Representations to the South Gloucestershire Local Plan 2018 - 2036 Consultation.<br><br>CEG manages 1000 Aztec West, which comprises a 3,600m² (39,000 ft²) two storey office building constructed in the 1980's. Until recently the property was let to ST Microelectronics (Research and Development) Ltd but it is now vacant.<br><br>Core Strategy Policy CS12 identifies Aztec West as a Safeguarded Area for Economic Development where B Use Classes, public and community uses and main Town Centre uses are supported.<br><br>The Local Plan Consultation focuses on three elements where a change to the existing approach is proposed i.e. urban living, Strategic Development Locations and small-scale development in rural area. The Consultation Document confirms that Policy CS12 will be replaced but that any new Policy will be developed following the outcome of this current round of Consultation and progression of the Joint Spatial Plan. CEG supports the principle of Policy CS12 and is keen to ensure that any changes to the Policy maintain flexibility so that businesses can quickly respond to changes in the market and economy. Other emerging Development Management requirements should also maintain flexibility and take account of viability as is appropriate. This will ensure that future economic development is not unnecessarily hindered and that the West of England's growth aspirations can be achieved.<br><br>For example, the Consultation Document considers whether the requirement to reduce CO2 emissions by at least 20%using Renewable Energy or low Carbon energy generation can be extended towards 100% (zero Carbon) for all developments and types of sites. However, there is no evidence to suggest that a 100% CO2 emission reduction target is technically feasible. Also, this proposal would go significantly beyond the Energy Performance Standards set by Part L of Building Regulations and is contrary to the Government's stated intention to establish improved standards for energy efficiency through amendments to the Planning & Energy Act 2008. Whilst amendments to statute have not yet been enacted, the Government's clear view is that Councils should not introduce Energy Performance Standards that exceed Building Regulations. Furthermore, it may be that contributions towards meeting other Policy objectives (such as improvements to Public Transport) would have a more beneficial impact on reducing CO2 emissions and there should be provision in the Policy for this to be weighed in the balance.<br><br>We look forward to reviewing any amendments to Policy CS12 on Safeguarded Areas for Economic Development with a view to ensuring that any Policy expectations are appropriate to local market conditions, and incorporate appropriate flexibility so that businesses can respond to changing circumstances.<br><br>We hope that these Comments assist in shaping the next stage of the Local Plan. If any additional information or clarification is required, please do not hesitate to contact the undersigned. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Douglas Homes |
| **Comment ID** | 20120033/2008 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sir or Madam,<br><br>**South Gloucestershire Local Plan 2018 - 2036 February 2018** |

| | |
|---|---|
| | **Representations On Behalf of Douglas Homes**<br><br>I write on behalf of our Client, Douglas Homes to provide Representations to the above Local Plan Consultation. The Representation below is made in relation to our Client's ownership of Land at Lucas Works, Kingswood, and the Bus Depot Site which was submitted as part of the Call for Sites to the Joint Spatial Plan (JSP).<br><br>Douglas Homes support the production of the new South Gloucestershire Local Plan to cover the Plan Period 2018 - 2036. This will fit with the Plan Period for the West of England Joint Spatial Plan (JSP) which was recently submitted to the Secretary of State. The JSP will provide the Strategic Planning Policy Framework for each of the four Authorities within the JSP area (South Gloucestershire, Bristol, Bath and North East Somerset and North Somerset). The South Gloucestershire Local Plan 2018 - 2036 must therefore provide Policies and allocations to assist in the delivery of the strategic aims and objectives of the JSP.<br><br>It is considered that the general approaches outlined in the Local Plan Consultation Document February 2018 are in accordance with, and will help to deliver, the Policies within the JSP. Of particular note in relation to our Client's ownership of Land at Lucas Works, is the JSP requirement to deliver 3,900 homes in urban localities and Draft Policy 2 which sets out the Spatial Strategy for the West of England. This states that one of the ways that the housing and job requirements will be achieved is through "*maximising the sustainable development of previously developed land and other appropriate opportunities within existing urban areas.*" Douglas Homes responded to the last Consultation on the JSP, noting that the JSP's approach to previously developed land was sound and that where appropriate, Local Authorities should be looking to maximise densities on previously developed sites where it is possible to integrate this into the existing townscape setting. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ellandi LLP and The Englander Group |
| **Comment ID** | 20119969/2015 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sir/Madam,<br><br>**Regulation 18 Local Plan Consultation Document (February 2018)**<br><br>**Representation On Behalf of Ellandi LLP and The Englander Group**<br><br>Williams Gallagher Town Planning Solutions Ltd (Williams Gallagher) act on behalf of Ellandi LLP (Ellandi) who asset manage Yate Shopping Centre on behalf of The Englander Group and Crestbridge Corporate Trustees Ltd and Crestbridge Trust Ltd as Trustees of the Yate Shopping Centre Unit Trust(Englander).<br><br>We have set out below a series of observations made in connection with the New South Gloucestershire Local Plan (SGLP) Consultation Document which has been made available for Comment between 5th February and 30th April 2018. In doing so, we have referred to the questions that are included throughout the Document to enable you to categorise our Responses efficiently.<br><br>It is understood that you are seeking Comments on three key elements of the proposed new Strategy for development where a change of approach is required in the SGLP (compared to the approach within the adopted Core Strategy) namely:<br><br>o The proposed approach to urban living;<br><br>o Strategic Development Locations identified in the JSP; and<br><br>o Smaller scale development in the rest of South Gloucestershire (Part 2).<br><br>You are also seeking Comments on the evolution of Policies from the Core Strategy and the Policies Sites and Places (PSP) Plan and how they might fit together within the new Local Plan (Part 3).<br><br>We very much welcome the opportunity to Comment on this Plan and would like to meet with you as soon as possible to address the points we have made in this Submission. We would also like to discuss your plans for Yate in more detail and to discuss the work that has recently been undertaken by the Nash Partnership (South Gloucestershire Urban Localities: Review of Potential).<br><br>**Background to Representation:**<br><br><u>Ellandi LLP:</u><br><br>By way of background, Ellandi took on the role of Asset Manager for the owners of Yate Shopping Centre (Englander) in January 2016.<br><br>Ellandi was formed in 2008 and is a leading specialist Shopping Centre Investment and Asset Manager. Its approach is to proactively transform the towns in which it invests by working with occupiers and other Stakeholders to ensure that its Shopping Centres perform a successful and vibrant role for the local communities that they serve. By pioneering a new form of Shopping Centres that are referred to as 'Community Shopping Centres,' the effect is that where investment has already been made in its Shopping Centres Ellandi is securing a substantial positive effect on the vitality and viability of the associated Town Centre. |

The Ellandi Community Shopping Centre Initiative is a truly community-orientated initiative which, amongst other things, seeks to facilitate through the Planning process the repositioning of Ellandi's Shopping Centres, and the Town Centres they serve, at the heart of their local communities.

The Community Shopping Centre sector has benefited from the polarisation of shopping patterns between major comparison destinations, such as The Mall, Cribbs Causeway and Bristol, and the every-day, community Shopping Centres, of the type Ellandi invests in. By applying financial and intellectual capital to these locations, Ellandi has become a market leader in promoting such centres. This promotion includes engaging with local Stakeholders, empowering Centre Managers to connect with local people through events and charities and incubating complementary ancillary uses to ensure that the towns in which they operate thrive.

Driving Ellandi's strategic focus is a fundamental and unwavering belief that community improvement, regeneration and financial return are not mutually exclusive. Rather, it considers its Shopping Centres have a major role to play in terms of creating a positive impact that improves/ regenerates Town Centres to the benefit of all those involved. This in turn has far-reaching and long-term benefits including job creation, social cohesion and encouraging sustainable patterns of travel.

<u>The Englander Group and Yate Shopping Centre:</u>

The Englander Family has been the owner of Yate Shopping Centre for  years. Since this time, it has invested over  in Yate Shopping Centre which has included the delivery of more than 140,000 sqft of new retail/leisure floor space at East Walk and Yate Riverside as well as bringing forward a new integrated Public Transport Hub. This investment has been critical to improving footfall, creating employment and generating Tax Revenues for the District to the extent that the Centre's businesses now employ over  staff – the new Tesco, East Walk extension and Riverside created over  new jobs.

Notwithstanding the above investment, Yate Town Centre continues to face significant challenges which must not be overlooked/underestimated. Nationally, demand for new retail space (and increasingly leisure/food and beverage space) is becoming increasingly subdued with existing retailers in the Centre continuing to feel the effects of changes to shopper habits brought about by outside influences such as Internet shopping and the increasing dominance of higher order centres such as Bristol and The Mall at Cribbs Causeway.

As a result, and notwithstanding significant efforts on the part of both Englander and Ellandi to address the abovementioned challenges, there are units currently vacant in the Shopping Centre, with others occupied by temporary lettings/retailers in financial distress. It is also increasingly difficult to attract new tenants in an increasingly competitive market. These are challenges that will continue to prevail across the new Plan Period.

Subdued demand for new Town Centre floor space has meant that more peripheral locations have suffered (such as North Parade and South Parade) as these locations are far less attractive to retailers/traditional Town Centre uses – there is a need to re-imagine these spaces to secure their future. Support is also needed from the Local Authority to allow for more flexibility for Changes of Use and to enable Englander/Ellandi to react quickly to meet demand for new floor space as new trends/concepts emerge.

Going forward, and having regard to the abovementioned challenges, Englander's immediate objectives for Yate Shopping Centre are as follows:

o Addressing/re-imagining 'peripheral' locations (e.g. North Parade, South Parade and Upper Floors) - this will include introducing new residential units across the Centre to:

o Create a new community in the Town Centre;

o Contribute to District housing supply; and

o Generate a new source of income to be re-invested within the Town Centre (public realm improvements etc);

o Reconfiguring existing space to accommodate new retailers/Town Centre occupiers;

o Improvements to public realm/civic areas, improvements to signage and ongoing investment in the Centre's events programme;

o Working with South Gloucestershire Council & its partners to deliver projects to further enhance the Centre (including sites outside of its ownership); and

o Supporting strategic projects including a new Park & Ride facility, the 'regeneration zone' running from the railway station to the Shopping Centre and housing growth at Western Gateway – it also looks forward to working with the Council on future regeneration projects and in respect of the One Estate Strategy.

Both Ellandi and Englander recognise that the Town Planning System has a fundamental role to play in supporting their overarching vision and underpinning objectives for Yate Shopping Centre and therefore welcome this opportunity to engage with the New Local Plan at this early preparatory stage.

They also both look forward to continuing their positive working relationship with South Gloucestershire Council to ensure the Local Plan promotes Yate Town Centre as a focus for regeneration and growth and affords it adequate Policy protection/flexibility so that the Investment Strategy for the Centre can be delivered effectively.

**Part 1 - Introduction:**

| | |
|---|---|
| | Referring to Part 1 of the Consultation Document, we wish to make the following observations:<br><br>• We agree with your statement at Page 15 that there is a need to provide for the retail services required by the growing population and to ensure the long-term health of the District's Town Centres. We would however caveat this by noting that the health of the District's Town Centres will no longer be solely dependent on the delivery of new retail floor space (as has traditionally been the case) – in fact, parts of the District's Town Centres would benefit from consolidation to ensure a quality offer is maintained. Peripheral areas will need to be considered carefully in terms of their future contribution to the vitality and viability of the District's Town Centres and in terms of their contribution to other Plan objectives (such as the need to address the growth in the District's population and the need for a a wider range of housing types and sizes to cater for all sections of the community).<br><br>o We support the overarching priority to provide for identified, overall retail growth requirements in suitable locations and for the regeneration and intensification of existing Town Centres. These retail requirements must however have regard to the changing face of retail/Town Centres (referred to above)and not simply plan for quantitative requirements as is so often the case. Indeed, in planning for the District's retail/Town Centre floor space requirements, regard must be had to qualitative need for new retail/Town Centre floor space which would have regard to, inter alia, market demand and market conditions. As we have set out above, the retail/Town Centre market remains extremely challenging – there needs to be an element of realism when setting Local Plan targets for the provision of new retail floor space and a targeted focus on making improvements to existing floor space to ensure the needs of the resident population are met. In our experience, over-stating retail need when there is insufficient market demand can have severe consequences for the health of allocated centres. Indeed, more often than not it leads to the relocation of existing retail tenants from sustainable Town Centre locations to unsustainable out of centre locations (where new out of centre development purports to be meeting retail need when in fact it serves to displace existing Town Centre tenants).<br><br>o In addition to the above, we wish to highlight a particular Policy within your Core Strategy (namely Policy CS13) which requires proposals for Change of Use on non-safeguarded economic development sites to demonstrate that there have been reasonable attempts to secure a suitable economic development re-use. Whilst national Policy distinguishes between economic uses (Chapter 1) and main Town Centre uses (Chapter 2), this Policy does not and therefore, requires all proposals for Changes of Use away from a main Town Centre use (including those falling outside of the Primary and Secondary Frontage) to demonstrate that reasonable attempts have been made to secure a suitable economic re-use.<br><br>Whilst we acknowledge the rationale behind this Policy, it is problematic and ambiguous in its current form as it fails to define what is to be regarded as a 'reasonable attempt to secure a suitable economic re-use.' There is a need for greater certainty as to how this Policy will be applied by South Gloucestershire Council in the Emerging Plan. We are concerned that a continuation of this Policy in its current form could result in long term vacancies in Town Centre locations when in fact, there is an abundance of evidence to suggest that certain Town Centre locations are no longer fit for purpose to accommodate main Town Centre uses and could instead contribute to other Plan objectives (while still contributing to the vitality and viability of the Town Centre in question).<br><br>We very much hope that the enclosed Comments will be of assistance and look forward to meeting with you in due course to discuss in more detail. We shall make contact in the next few weeks to arrange. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Group West |
| **Comment ID** | 19927585/2019 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Please see enclosed Representations. |
| **Attached documents** | Group West - Planning Potential (Mr. James Tavernor).pdf (3.0 MB) |

| | |
|---|---|
| **Respondent Name** | Sue Hope |
| **Comment ID** | 411169/2032 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **Response to South Gloucestershire Local Plan by Cllr. Sue Hope, Cotswold Edge Ward.**<br><br>I have tried to respond to the Online Consultation. The site is very unhelpful and not user friendly. I have given up trying to use the website Response Form and will try and respond in the best way I can.<br><br>The unhelpful layout of the Documents makes responding to the key points very difficult. Guiding the Response to certain areas and avoiding others. The drop in held for both District Councillors and local Parish Councils was less than helpful.<br><br>I believe that there should be additional bullet points in this outline vision for the Local Plan covering: a) Heath and Health Inequalities; and b) the Council's responsibility to ameliorate and adapt to Climate Change. Although these issues are mentioned elsewhere in the Document I believe that they are of such significance that they should be emphasised in this vision statement.<br><br>**Neighbourhood Plans and Community Land Trusts:**<br><br>In the past there has been little commitment from South Gloucestershire Council to provide support and advice to local communities seeking to develop Neighbourhood Plans. Hitherto, a number of Parishes that have attempted to produce Neighbourhood Plans have struggled with producing Technical Planning Documents without expert support from South Gloucestershire Planning Officers. Without such support, the right of communities to produce Neighbourhood Plans is meaningless. The same could be said for Community Land Trusts, which would go some way to help provide Affordable Homes in rural areas. Indeed Community Land Trusts are not mentioned in the Plan. |

| | |
|---|---|
| | **Travel Accessibility:**<br><br>A further key issue should be included: the need to provide a culture change in public attitudes to the use and value of Public Transport. There is little to suggest or promote the use of Public Transport, which will be necessary to get around the area.<br><br>**Strategic Development Locations:**<br><br>Paragraph 2.31 – as stated above; the contingency at Chipping Sodbury to be released in the absence of a five year land supply is an invitation for developers to land-bank, which is precisely what the Local Plan is supposed to be putting a stop to.<br><br>**Appendix 3 - Green Belt and AONB:**<br><br>**Tormarton Park & Share Site:**<br><br>There has been a long term aspiration for a Park & Share site at A46/M4/J18. There is no mention of this in the Local Plan. Three positive Feasibility Studies have been conducted by the Council. It has been suggested that there might be change to the Green Belt to allow for this; I can see no reason for any adjustment to the Green Belt for this to happen, especially as this was not an issue during SGC's bid to put a large composter on the site. The proposed site is covered by Green Belt and the Cotswolds Area of Outstanding Natural Beauty. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Olga Taylor |
| **Comment ID** | 19937057/2043 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | I believe a better service is needed for Pilning Station. With more traffic on the roads a better rail service is essential for people wishing to travel to Bristol, Newport and Cardiff and beyond. With the new Motorway Junction getting built close to Pilning, Pilning Station would be ideal for a Park and Ride for passengers wishing to head into the city.<br><br>On the other hand, it would be good to save thousands of employees at Severnside Enterprise Area car journeys. Please note that the Enterprise Area is currently growing, with new large Distribution Centres being built. A fully functioning railway station will increase the value of the local land and business, thus generating more income for the Council.<br><br>If Pilning Station could be relocated around 400 yards towards the Severn Tunnel on the loop lines, not only it would serve the local villages better, but also the faster express services could overtake the trains stopped at Pilning.<br><br>In this day of trying to achieve a cleaner environment, rail is the best option.<br><br>Attached is the Business Plan for the relocated railway station (Pilning Westgate), along with the suggested train times. |
| **Attached documents** | MS. Olga Taylor.pdf (398 KB) |

| | |
|---|---|
| **Respondent Name** | John E. Acton |
| **Comment ID** | 10630113/2044 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **SOUTH GLOUCESTERSHIRE LOCAL PLAN CONSULTATION FEBRUARY 2018**<br><br>**CHARFIELD AS A STRATEGIC DEVELOPMENT LOCATION**<br><br>**Introduction:**<br><br>1. It is unfortunate that the preparation of the new Local Plan is continuing so far in advance of the West of England Joint Spatial Plan (JSP), as decisions on the latter will largely control the future of development in South Gloucestershire. I have commented adversely on Policy 7.9 of the JSP with respect to the identification of Charfield as a Strategic Development Location. The proposed expansion of the village is either too much or too little and is neither justified nor effective. I have concluded that the JSP is of doubtful soundness. I have indicated that I wish to participate in the Examination Hearings for the JSP. |

| | |
|---|---|
| | 2. Rather than go through the details of my reasoning again, I attach the following Documents which were also submitted to the JSP Team. Appendix A: West of England Joint Spatial Plan – Public Representation Form [as submitted]; Appendix B: West of England Joint Spatial Plan and Joint Transport Study [Comments dated 6th December 2016]; Appendix C: South Gloucestershire Local Plan Charfield as a Strategic Development Location [Comments dated 25th September 2017].<br><br>**Charfield:**<br><br>3. I note the statement on Page 3 of the Local Plan that "*South Gloucestershire Council wants to do this in a sustainable way to provide good quality, well designed development which strengthens our communities and provides the range of infrastructure, services and facilities to enable all parts of the community to prosper.*" At Paragraph 2.36 the Local Plan says in the context of Strategic Development Locations "*We are also aware that there is already developer interest in some of the locations, and it is important to begin the early thinking about the master-planning of the locations in Consultation with local and community interests. This is in order to avoid piecemeal and un-coordinated development that may not deliver the benefits of good place-making and investment in necessary infrastructure. It can also give the Council a 'stronger hand' in resisting inappropriate proposals in advance of a robust masterplanning process.*" Charfield is a village that is suffering from just the problems that these extracts from the Local Plan warn against. The village has been, and is being, beset by piecemeal residential developments not related to each other. Furthermore they are not well related to existing facilities and do not provide substantial new facilities to benefit the community.<br><br>4. If Charfield is to be expanded again, a robust masterplanning process will be essential. A remodelling of the village will be required to provide the appropriate facilities including Schools and primary healthcare, solve the problem of conflict between village movements and traffic accessing the M5 Motorway, and include the provision of a new station with an adequate train service and parking. Beyond the developed area, there would be a need to improve Junction 14 on M5, improve the link to Wotton-Under-Edge in Stroud District (probably by means of a cycleway and minor improvements to the road) and review the adjoining footpath network (including the reopening of footpath OCH8 with a bridge or tunnel across the railway). Considering these requirements together, in the context of good place-making, it is immediately obvious that a Bypass or Relief Road for Charfield will be essential. That could be co-ordinated with the new station, which might not be best sited on the land currently safeguarded.<br><br>5. Paragraph 2.44 of the Local Plan refers to a Supplementary Planning Document. Clearly one would be necessary for Charfield in order to ensure development co-ordinated with the essential infrastructure. Only during the formulation of the SPD would it be possible to apply some costs to the infrastructure to see whether planned expansion of the village would be viable. Paragraph 1.14 of the Local Plan refers to a Sustainability Appraisal, but that doesn't cover the Strategic Development Locations which are a matter for the JSP. I have looked at the Sustainability Appraisal for the JSP and find that it does not address the cost of infrastructure. It merely checks that there would be some resources available from the development. It does not consider what infrastructure would be necessary for a Strategic Development, what it would cost or whether the available resources would be sufficient.<br><br>6. Without an SPD it is not possible to put a figure on the cost of the infrastructure necessary to service a further expansion of Charfield by 1,200 dwellings. However, it is obvious that it would be tens of millions of Pounds. I believe that 1,200 dwellings would not provide anywhere near enough. As my Response to the JSP points out, viability is an issue at Charfield. There is no evidence in the Background Papers to the JSP, and of course no evidence in the Local Plan Papers, to support Charfield as a Strategic Development Location.<br><br>7. In recent years Charfield has had a Housing Needs Assessment and a Village Plan, and has progressed a Neighbourhood Plan. I have not been closely involved in any of that work. But it must be depressing for Charfield residents who have done the work that their efforts have been torpedoed by the Draft JSP and Local Plan. It is top-down Planning at its worst, because it is not supported by convincing evidence. I appreciate that South Gloucestershire Council cannot unilaterally delete a Strategic Development Location from the Local Plan, which must be in accordance with the JSP. Nevertheless, on behalf of their residents South Gloucestershire Council could and should strongly express to their partner Councils that the identification of Charfield as a Strategic Development Location is not supported by evidence and should be deleted from both the Local Plan and the JSP.<br><br>**Conclusion:**<br><br>8. I object to the identification of Charfield as a Strategic Development Location in the Local Plan because it is not supported by convincing evidence. The development would not generate the funds needed to provide the necessary infrastructure. The designation of Charfield as a Strategic Development Location should be deleted from both the Local Plan and the Joint Strategic Plan. |
| **Attached documents** | John E. Acton.pdf (611 KB) |

| | |
|---|---|
| **Respondent Name** | Liz Pickering - Education and Skills Funding Agency |
| **Comment ID** | 17384065/2045 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sir/Madam,<br><br>**Re: South Gloucestershire Local Plan 2018 - 2036**<br><br>**Consultation under Regulation 18 of Town and Country Planning (Local Planning) (England) Regulations 2012**<br><br>**Submission of the Education and Skills Funding Agency:**<br><br>1. The Education and Skills Funding Agency (ESFA) welcomes the opportunity to contribute to the development of Planning Policy at the local level.<br><br>2. The ESFA launched on 1st April 2017, bringing together the existing responsibilities of the Education Funding Agency (EFA) and the Skills |

Funding Agency (SFA), to create a single funding agency accountable for funding education and training for children, young people and adults. The ESFA are accountable for  of funding a year for the education and training sector, including support for all state-provided education for children aged 3 to 16, and  young people aged 16 to 19.

3. Under the provisions of the Education Act 2011 and the Academies Act 2010, all new state Schools are now Academies/free Schools and the ESFA is the delivery body for many of these, rather than Local Education Authorities. As such, we aim to work closely with Local Authority Education Departments and Planning Authorities to meet the demand for new School places and new Schools. We do this through a variety of means, including by supporting the adoption of sound Local Plan Policies, site allocations and guidance (all based on robust evidence) that facilitate the delivery of education infrastructure where and when it is needed and maximise developer contributions for Schools. In this capacity, we would like to offer the following Comments in response to the proposals outlined in the above Consultation Document.

**General Comments on the Local Plan Approach to New Schools:**

4. The ESFA notes that substantial growth in housing stock is expected in South Gloucestershire; the Emerging West of England Joint Spatial Plan sets a housing target of 32,500 dwellings in the period to 2036. Coupled with historic high levels of growth which the Council recognises has not been matched by the provision of infrastructure, the pressure on social infrastructure such as education facilities will be significant. The Department for Education has approved several free Schools in South Gloucestershire, and the ESFA is progressing a number of pipeline projects in the area. The Local Plan will need to be 'positively prepared' to meet the objectively assessed development needs and infrastructure requirements.

5. The ESFA welcomes the recognition of this issue within the Plan, and the local priority to use the opportunities afforded by development to meet infrastructure needs in a timely fashion. In light of the requirement for all Local Plans to be consistent with national Policy, you will have no doubt taken account of key national Policies relating to the provision of new School places, but it would be helpful if they were explicitly referenced or signposted within the Document. In particular:

- The *National Planning Policy Framework* (NPPF) advises that Local Planning Authorities (LPAs) should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of School places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter Schools to widen choice in education (Para 72).

- The ESFA supports the principle of South Gloucestershire Council safeguarding land for the provision of new Schools to meet Government Planning Policy objectives as set out in Paragraph 72 of the NPPF. When new Schools are developed, Local Authorities should also seek to safeguard land for any future expansion of new Schools where demand indicates this might be necessary.

- The Council should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on *'Planning for Schools Development'1 (*2011) which sets out the Government's commitment to support the development of state-funded Schools and their delivery through the Planning System.

1 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6316/1966097.pdf

6. In light of the above and the Duty to Co-operate on strategic priorities such as community infrastructure (NPPF Para 156)2, the ESFA encourages close working with Local Authorities during all stages of Planning Policy development to help guide the development of new School infrastructure and to meet the predicted demand for Primary and Secondary School places. Please add the ESFA to your list of relevant organisations with which you engage in preparation of the Plan.

2 NPPF Paragraph 180 specifies that this collaborative working should include infrastructure providers.

7. In this respect, the ESFA commends, for example, the approach taken by the London Borough of Ealing in producing a Planning for Schools Development Plan Document (DPD, 2016)3. We are not suggesting that South Gloucestershire Council produces a separate DPD as Ealing have done, but we do believe that the systematic approach they have taken is informative for Local Plans. The DPD provides Policy direction, establishes the Council's approach to providing Primary and Secondary School places and helps to identify sites which may be suitable for providing them (including, where necessary and justified, on Green Belt/MOL), whether by extension to existing Schools or on new sites. It includes site allocations as well as Policies to safeguard the sites and assist implementation and was adopted in May 2016 as part of the Local Plan. The DPD may provide useful guidance with respect to an evidence based approach to planning for new Schools in the Emerging South Gloucestershire Local Plan, securing site allocations for Schools as well as providing example Policies to aid delivery through Development Management Policies.

3 https://www.ealing.gov.uk/info/201164/local_plans/1961/planning_for_schools_dpd

8. Ensuring there is an adequate supply of sites for Schools is essential and will ensure that South Gloucestershire Council can swiftly and flexibly respond to the existing and future need for School places to meet the identified needs over the Plan Period.

**Site Allocations:**

9. At this early stage of the Emerging Local Plan site allocations have not yet been drafted, but the Emerging West of England JSP has identified Strategic Development Locations in South Gloucestershire, which this Plan will deliver. The next version of the Local Plan should identify specific sites (existing or new) which can deliver the School places needed to support growth, based on the latest evidence of identified need and demand in an updated Infrastructure Delivery Plan (IDP) or Infrastructure Statement. The ESFA's Representation on the Regulation 19 Consultation of the West of England JSP is appended to this letter, including recommendations about the contents of the IDP which are equally applicable to this Local Plan. Please consider the ESFA's recommendations in that letter as part of this Representation.

10. The site allocations or associated Safeguarding Policies should also seek to clarify requirements for the delivery of new Schools, including when they should be delivered to support housing growth, the minimum site area required, any preferred site characteristics, and any requirements

| | |
|---|---|
| | for safeguarding additional land for future expansion of Schools where need and demand indicates this might be necessary. For an example of the latter, see Draft Policy CC7 in Milton Keynes's Plan: MK Preferred Option draft from March 20174.<br><br>4 https://www.milton-keynes.gov.uk/planning-and-building/planning-policy/plan-mk<br><br>11. While it is important to provide clarity and certainty to developers, retaining a degree of flexibility about site specific requirements for Schools is also necessary given that the need for School places can vary over time due to the many variables affecting it. The ESFA therefore recommend the Council consider highlighting in the next version of the Local Plan that:<br><br>- Specific requirements for developer contributions to enlargements to existing Schools and the provision of new Schools for any particular site will be confirmed at Application stage to ensure the latest data on identified need informs delivery; and that<br><br>- Requirements to deliver Schools on some sites could change in future if it were demonstrated and agreed that the site had become surplus to requirements, and is therefore no longer required for School use.<br><br>**Forward Funding:**<br><br>12. In light of the scale of housing and infrastructure required, emerging ESFA proposals for forward funding Schools as part of large residential developments may be relevant, for example if viability becomes an issue. The ESFA aims to be able to clarify forward funding options for Schools in 2018. We would be happy to meet to discuss this opportunity further once the options have been finalised and if/when relevant. Any offer of forward funding would seek to maximise developer contributions to education infrastructure provision while supporting delivery of Schools where and when they are needed.<br><br>**Developer Contributions and CIL:**<br><br>13. One of the tests of soundness is that a Local Plan is 'effective' i.e. the Plan should be deliverable over its period. In this context and with specific regard to planning for Schools, there is a need to ensure that education contributions made by developers are sufficient to deliver the additional School places required to meet the increase in demand generated by new developments. The ESFA notes that South Gloucestershire Council adopted CIL in 2015 and intends to review the charging schedule alongside the preparation of this Local Plan.<br><br>14. The ESFA would be particularly interested in responding to any update to the IDP or review of infrastructure requirements, which will inform the CIL Review and/or amendments to the Regulation 123 list. As such, please add the ESFA to the Database for future CIL Consultations.<br><br>**Conclusion:**<br><br>15. Finally, I hope the above Comments are helpful in shaping the South Gloucestershire Local Plan, with specific regard to the provision of land for Schools. Please advise the ESFA of any proposed changes to the Emerging Local Plan Policies, supporting text, site allocations and/or Evidence Base arising from these Comments.<br><br>16. Please do not hesitate to contact me if you have any queries regarding this Response. The ESFA looks forward to continuing to work with South Gloucestershire Council to aid in the preparation of a sound Local Plan. |
| **Attached documents** | Education and Skills Funding Agency (Liz Pickering).pdf (887 KB) |

| | |
|---|---|
| **Respondent Name** | Newland Homes |
| **Comment ID** | 2857441/2047 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **2.0 SOUTH GLOUCESTERSHIRE PLANNING POLICY CONTEXT:**<br><br>**Core Strategy:**<br><br>2.1 South Gloucestershire adopted the Core Strategy in December 2013. The Council were committed to an early review by the end of 2018, this is taking the form of this New Local Plan 2018 - 2036.<br><br>**Policies, Sites and Places Plan:**<br><br>2.2 The Policies, Sites and Places Plan was adopted in November 2017. This Plan contains detailed Planning Policies to manage new development and allocate and safeguard sites for various types of development.<br><br>**Joint Spatial Plan:**<br><br>2.3 The JSP has undergone numerous stages of public Consultation, the last being the Publication Plan Consultation which took place from 22nd November 2017 – 10th January 2018. The JSP was submitted to the Secretary of State for Housing, Communities and Local Government for Examination on 13th April 2018.<br><br>**New South Gloucestershire Local Plan:**<br><br>2.4 This current Consultation is the second stage of Consultation for the LP, the first stage was the New Local Plan Prospectus Consultation which ran between 12th January 2017 and 23rd February 2017. |

| | |
|---|---|
| | **3.0 REPRESENTATIONS ON THE OVERALL STRATEGY:**<br><br>3.1 Newland Homes generally welcome the preparation of the SGNLP and whilst they are supportive they do have concerns over key components of the Strategy which are considered lacking in terms of achieving a robust Strategic Plan which will deliver the most sustainable pattern of growth. The following Sections look at the Emerging Plan in detail.<br><br>**The Proposed Spatial Strategy:**<br><br>3.2 The Strategy for new development in South Gloucestershire detailed in the SGLP is made up of 4 elements:<br><br>o 22,300 dwellings from the build out of the development planned for in the South Gloucestershire Core Strategy;<br><br>o 2,900 dwellings from maximising the use of Brownfield land within the urban areas;<br><br>o 6,000 dwellings from five new SDLs (+500 dwellings) at Yate, Charfield, Thornbury and Coalpit Heath and the proposed Buckover Garden Village. The JSP also proposes a 1,000 dwelling contingency at land South of Chipping Sodbury which will only be released if it is demonstrated that housing provision is not being delivered at the levels being planned for;<br><br>o 1,300 dwellings from non-strategic sites in the rural areas (10 - 499 dwellings). The JSP also proposes a 500 dwelling contingency from non-strategic sites which will only be released if it is demonstrated that housing provision is not being delivered at the levels being planned for and where there would be no reasonable prospect of planned delivery being met otherwise.<br><br>3.3 The 22,300 to be delivered from the build out of planned developments in the Core Strategy includes the large new neighbourhoods at Patchway/Cribbs Causeway, Harry Stoke, Emersons Green, North Yate and Thornbury. However, when discussing non-strategic sites, the SGLP at Paragraph 2.29 states:<br><br>*"Historically Local Plans in South Gloucestershire have focused on larger sites in a limited range of places, for example growth in Yate, Thornbury and at Filton Airfield. This has contributed to a reliance on relatively large sites, in a small number of places to meet the District's need for deliverable homes, and directs the benefits of growth to a limited number of places."*<br><br>3.4 As stated previously in these Representations, South Gloucestershire Council have a history of failing to meet housing targets and have not been able to demonstrate a five year supply of housing land for a number of years. Newland Homes would therefore suggest the SGLP Strategy is overly reliant on 6,000 dwellings being delivered at the SDLs, when this Strategy and existing committed development has led to persistent under-delivery in the past. We believe a more appropriate balance should be struck that increases delivery in from non-strategic sites in sustainable locations.<br><br>3.5 At present, it is felt that the Strategy relies too heavily on large scale sites and should instead be looking to deliver more than 1,300 dwellings (1,800 if including 500 dwelling contingency) on non-strategic sites. Non-strategic sites tend to have shorter lead in times and are less reliant on major infrastructure improvements or increased service provision and so could help the Council ensure that they are meeting housing targets from the very beginning of the Plan Period.<br><br>3.6 The Council's Strategy relies on 2,900 dwellings being delivered on Brownfield land. Brownfield sites are generally less deliverable than Greenfield sites due to complications such as availability, existing use values and abnormal costs such as contamination. It is felt that the SGLP should not be so reliant on Brownfield land to achieve the housing targets set by the JSP as there could be a risk of not meeting said targets, especially in the short term.<br><br>**6.0 CONCLUSION:**<br><br>6.1 This Consultation Response has set out to highlight that whilst Newland Homes is generally supportive of the delivery of the SGLP they have concerns over key components of the Spatial Strategy and therefore question the overall soundness of this approach. This leads to concern that the SGLP will fail to deliver the required housing figures as detailed in the JSP in the most sustainable way. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Cribbs Mall Nominee (1) Ltd, Cribbs Mall Nominee (2) Ltd, Baylis Estates Ltd ... |
| **Comment ID** | 16634465/2053 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sir/Madam,<br><br>**South Gloucestershire Local Plan - Consultation Document**<br><br>Our Representations to the South Gloucestershire Local Plan Consultation Document are submitted on behalf of our Client, Cribbs Mall Nominee (1) Ltd, Cribbs Mall Nominee (2) Ltd, Baylis Estates Ltd and John Baylis Ltd. Our Client owns and manages The Mall at Cribbs Causeway and has made Representations to various Policy Documents that have implications for The Mall over many years.<br><br>Our Client has long held aspirations to improve The Mall for the benefit of both existing residents in the surrounding area and the emerging communities. The Application to extend The Mall (PT14/4894/O) was submitted in the absence of a Policy Framework which plans positively for the future of The Mall, and was assessed by the Council against Policies in the adopted Core Strategy and the NPPF. The Application received a recommendation to Approve at Committee in November 2016, and was subsequently Called-in by the Secretary of State. The Inquiry was held in September 2017, and is pending determination. This Application seeks to create additional retail (Class A1 - A5) uses, leisure uses, hotel, events space, new bus station, replacement car parking, new homes and enhanced pedestrian and cycle infrastructure. |

**NPPF Requirements for Planning Policies:**

The NPPF identifies 12 core Planning Principles (Para. 17) that should underpin both Plan-making and decision-taking, including:

*"Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.* ***Plans should*** *take account of market signals, such as land prices and housing affordability, and* ***set out a clear Strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities****."*

The NPPF is clear in providing instructions for Councils to prepare Local Plans. The NPPF (Para. 161) requires Local Planning Authorities to use their Evidence Base studies to assess the needs for land or floor space for economic development over the Plan Period, including for retail and leisure development, and assess the existing and future supply of land available for economic development and its sufficiency and suitability to meet the identified needs.

Para. 23 of the NPPF requires Planning Policies to be positive, promote competitive Town Centre environments and set out Policies for the management and growth of centres over the Plan Period. In drawing up Local Plans, Para. 23 requires Local Planning Authorities to, among other things:

*"Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in Town Centres. It is important that needs for retail, leisure, office and other main Town Centre uses are* ***met in full*** *and are not compromised by limited site availability."*

**Brief Chronology of South Gloucestershire Retail Policy:**

**South Gloucestershire's Evidence Base that was produced in order to inform the Core Strategy identified that there was a need for an additional 34,000 sq.m net of comparison goods retail floor space over the period to 2026. The Draft Core Strategy, incorporating post-submission changes, appropriately sought to address this identified need, and Policy CS14 stated:**

***"New investment in main Town Centre uses will be directed into the town, District and emergent centres, consistent with the scale and function of the centre, including making provision for 34,000 sq.m. net of new comparison floor space by 2026 to meet the needs of the communities in South Gloucestershire. 18,000 sq.m. of this new floor space will be provided at The Mall Regional Shopping Centre, with the remaining floor space to be identified in the Policies, Sites and Places Development Plan Document."***

**However, the Inspector amended the Policy to remove the allocation at The Mall, and recommended that future comparison floor space provision should be addressed as part of the Review of the Core Strategy or a replacement Local Plan. The Report stated (Paras. 183 – 184):**

***"The Council's original intention was that future comparison floor space provision would be identified in the PSPDPD. This remains a possibility but the regional dimension of the proposals and the concerns of other parties suggest a more sensible approach would be to address this matter as part of the Review of the CS (or replacement Local Plan) which I have advocated.***

***I therefore recommend Policy CS14 is modified in accordance with MM14. I have made additional changes to this modification to refer to the possibility of undertaking further work through a replacement Local Plan/CS…"***

**This was despite the Inspector's Report post-dating the NPPF and its imperative to meet the identified needs in full. The Council accepted the Inspector's recommendations, and the requirement to allocate sites to meet the retail floor space needs was deferred.**

**As part of the work undertaken in preparing the Policies, Sites and Places DPD, a Retail Capacity Study was undertaken in 2014. The Study assessed the physical capacity of each of the defined centres to accommodate additional retail floor space. The Study stated (Para. 3.1):**

***"The Core Strategy requires the provision of 34,000 sq.m of additional comparison goods floor space to meet the District's needs up to 2026/27 in accordance with the retail hierarchy as set at Policy CS14. The Council has proposed that 17,000 sq.m of comparison floor space is allocated to the defined centres (proposed distribution shown at Appendix 1) in the Policies Sites and Place Plan (PSP) with the remainder identified as a residual to come forward in accord with Retail Policy"* (our emphasis).**

**The Study identified what floor space each of the defined centres could accommodate, thereby leaving a residual floor space requirement that needs to be located elsewhere.**

**The decision for the PSP DPD to not fully meet the Objectively Assessed Needs over the Plan Period is contrary to national Policy. In only identifying sites for development in the immediate short term (up to 2021), the Plan fails to meet one of the core Planning Principles of the NPPF.**

**The Topic Paper for the PSP DPD Examination stated (Para. 4.2.4) that significant uncertainties with the retail need post 2021 were considered to exist at the time of the Core Strategy's adoption (2013) which could make allocation through the PSP unrealistic. However, the PSP DPD was drafted on the basis of the existing Retail Evidence Base which informed the Core Strategy and underpins the identification of floor space required. There is therefore no justification to ignore the post 2021 requirements.**

**Our Client previously raised concerns in relation to the PSP DPD, where the Council failed to fully allocate sites to accommodate the Objectively Assessed Needs in full, on the premise that this would be dealt with through the new Local Plan. The Inspector's Report into the PSP DPD stated:**

***"PSP31 seeks to accommodate retail and other main Town Centre uses within the existing hierarchy of centres set out in Policy CS14 of the***

| | |
|---|---|
| | ***Core Strategy. It would meet the identified need for 18,000 sqm of comparison retail floor space by 2021 rather than the total 34,000 sqm by 2026 required by the Core Strategy, but CS14 provides for this to be done either in the PSPP or a replacement Core Strategy/Local Plan.***<br><br>***In light of the uncertainty surrounding the post-2021 forecasts (Document OS3, Paragraphs 4.2.3 - 4.2.11) the NLP* [new Local Plan] *provides the appropriate route for reviewing and addressing this matter. As this is due to be adopted by early 2019, Paragraph 23 of the NPPF can be satisfied within a relatively short period and, in the interim, out of centre retail proposals can and have been assessed with reference to the relevant sequential and impact tests…"***<br><br>**The Inspector's view was clearly that the issue of meeting needs post 2021 should be dealt with straight away. The latest timetable for production of the new Local Plan (April 2018) suggests that it will not be adopted until April 2020. There is therefore an urgent need to ensure that the new Local Plan properly plans for future floor space needs, given that the adopted Policies to date only deal with the needs up to 2021, and the timetable for adoption of the new Local Plan has already slipped by a year since the PSP DPD Examination.**<br><br>**The Joint Spatial Plan for the West of England has recently been submitted to the Secretary of State for Examination. The JSP focuses on housing and employment growth, and does not address the need for other types of development across the region. The Topic Paper for the PSP DPD (Para. 4.2.9) recognised a requirement for a new Retail Study to take into account the JSP growth figures. The Topic Paper stated (4.2.10):**<br><br>***"The revised Retail Study and work arising from it will be the correct place to consider allocations to meet need assessed post 2021, either at The Mall, Yate or other locations throughout the District."***<br><br>**Our Clients commented on the new Local Plan Prospectus in early 2017, emphasising the need for the Council to plan positively for the future sustainable development of The Mall as part of the Local Plan, given its huge importance to the existing communities that it serves and the future of the major growth area on the Northern Fringe of Bristol, of which it forms an integral part.**<br><br>**New Local Plan:**<br><br>**The Draft Local Plan recognises (P. 3) that there is an urgent need to plan for the homes, workplaces, services, facilities and infrastructure to meet the needs up to 2036 and ensure continuing prosperity for the area. However although the Draft Local Plan focuses on the future locations for new homes, there is no further discussion around the services that will be required over the Plan Period.**<br><br>**The Draft Local Plan identifies (P. 15) that one of the key issues for the local economy is the need to provide for the retail services required by the growing population, and to ensure the long term health of Town Centres, and that one of the challenges for the Plan is to provide for the identified, overall retail growth requirements in suitable locations.**<br><br>**The Draft Local Plan acknowledges (P. 32 - 34) that higher density development could be achieved in the Cribbs Patchway New Neighbourhood (CPNN) but shies away from recognising the important role that Cribbs Causeway could play in the future in creating a more integrated and connected neighbourhood. This is an opportunity for growth that should be supported by the Local Plan.**<br><br>**A new Strategic Policy is to be drafted (P. 73) for the new Local Plan that will replace the existing Town Centre and Retail Policies in the Core Strategy (CS14) and the recently adopted PSP DPD (PSP31). However, no further detail is offered about how this is to be dealt with.**<br><br>**Despite acknowledging the need to plan for future requirements, including retail and leisure floor space, to date there have not been any additional Evidence Base Reports produced that assess the retail floor space requirements over the Plan Period. Since the publication of the original Town Centre and Retail Study back in 2010, the Council has failed to satisfactorily deal with the issue of forecast floor space requirements in the various Development Plan Documents produced to date and has continued to defer any decisions. This short term approach creates uncertainty for investors and operators, including our Client.**<br><br>**It is imperative that this new Policy achieves what the Core Strategy and SPS DPD have failed to do, and satisfies the NPPF requirement that needs for retail, leisure and other main Town Centre uses are met in full and not compromised by limited site availability (Para. 23). Previous Policy Documents have failed to deal with the future sustainable development of The Mall, and it is important that the new strategic Local Plan Policy that deals with retail issues addresses this omission, so that there is certainty for the future, particularly given the importance of The Mall to the local economy.**<br><br>**A considerable amount of Technical Material was submitted with the Planning Application and also commissioned by the Council in its own right relating to a wide range of issues including Retail Policy matters. The Council has already made its position clear with regards to the future of The Mall through resolving to grant Planning Permission for its extension.**<br><br>**In line with NPPF guidance, the new Local Plan needs to plan positively to support growth and identify appropriate locations for future development. Irrespective of the current position of the Call-in Inquiry, The Mall at Cribbs Causeway should be identified as the preferred location for meeting identified floor space requirements. The site is an important Retail and Transport Interchange location that provides for the needs of the South Gloucestershire community and further afield, and forms an integral part of the new CPNN which is emerging around it and it is a focal point for this new community.**<br><br>**We look forward to working with South Gloucestershire Council in the formulation of the Local Plan Policies, and would welcome the opportunity to meet with Officers to discuss the matters outlined in this letter in more detail.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Linden Homes |
| **Comment ID** | 12293409/2055 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sir/Madam, |

**NEW SOUTH GLOUCESTERSHIRE LOCAL PLAN CONSULTATION DOCUMENT – RESPONSE ON BEHALF OF LINDEN HOMES**

We are instructed to provide a Response to the New South Gloucestershire Local Plan Consultation Document on behalf of Linden Homes. Linden Homes is one of the largest providers of new homes in England. This Response has been prepared having regard to land in which Linden Homes has interests to the North of Thornbury, including the Consented site at Post Farm (where approved development is under construction), as well as further land to the North. Linden Homes land interests at North Thornbury have previously been identified during relevant Call for Sites exercises for the JSP and Local Plan, updated Submission Forms (in respect of both Land at Post Farm and Yew Tree Farm are also being submitted.

Part of the land controlled by Linden Homes at North Thornbury is the subject to an Application for Outline Planning Permission (Ref: PT18/0913/O) which is Pending Consideration, for the development of 39 dwellings on the site. This area represents a second phase of development following the existing commitment of 125 dwellings immediately to the South (Approved under References: PT15/2917/O & PT16/4055/RM).

This area represents a suitable location for new development at Thornbury, which itself is a sustainable location for future growth to meet housing needs, support economic development and deliver other associated local objectives. Thornbury is a sustainable town at which further development can be accommodated within South Gloucestershire with good access to local facilities (including Thornbury Town Centre), employment opportunities and Public Transport Networks.

Set out below are Responses to the Questions within the current Consultation Document. Not all Questions are answered but we would like to retain the opportunity to Comment on wider topics if relevant when the opportunity arises later in the Local Plan process. Additional Comments are also included below on other aspects of the Consultation Document, and background evidence where appropriate.

**Comments on the Key Issues and Priorities:**

Part 1 of the Draft new Local Plan sets out various Key Issues and associated Priorities for the new Local Plan, these issues are set out in the following categories:

o Population and Housing;

o Local economy;

o Infrastructure and Service Provision;

o Travel Accessibility; and

o Environment, Climate Change and Flood Risk.

Although we do not object to any of the above topics being priorities for the Plan we would like to request that further, robust justification is provided to demonstrate why these specific objectives have been chosen and how the new Local Plan will achieve them. For example, on Page 14 of the Consultation Document the following is set out as a priority for the new Plan: '... To identify land for new housing to meet the housing requirement set out in the JSP.' For reasons set out below we disagree with the level of housing as currently proposed in the JSP given that it does not reflect the full OAN for the Plan area, nevertheless in principle this priority would be appropriate, so long as the JSP does fully reflect the full OAN for South Gloucestershire.

In addition to planning for sufficient housing to meet the actual OAN for the District, we consider that any aspiration or objective set out in the new Local Plan with regards to housing delivery should be based on a 'minimum' or an 'at least' figure, and that sufficient additional housing sites need to be identified to ensure that any adopted housing figure is met. This needs to be over and above the small amount of contingency sites identified elsewhere in the Draft Plan. In line with the requirements of the NPPF, and PPG, the Council need to ensure it plans positively to ensure housing needs are met. This is of particular importance to South Gloucestershire, an Authority that has failed to deliver sufficient housing to meet their adopted housing land supply requirement for some years.

We consider that the production of a new Local Plan should be seen by the Council as an opportunity to address a historic failure to maintain a housing land supply and to seek to deliver sufficient housing to meet the OAN in a proactive manner by planning for sufficient sites to ensure that at least the adopted housing requirement is delivered.

We also consider it important that, although not 'Policies' per se, that the Key Issues and Priorities should not be included in the Plan if they merely communicate vague and imprecise aspirations. We request that at subsequent stages of the Local Plan these 'priorities' are more clearly defined and specifically linked to subsequent Policies to demonstrate the Policy mechanism for achieving these aims.

**Comments of the New Local Plan Strategy for Development:**

Paragraphs 2.5 – 2.9 of the Consultation Document set out that the new Local Plan will deliver 32,500 new homes in South Gloucestershire in line with the figures for the additional level of Housing Growth proposed for South Gloucestershire in the Emerging West of England JSP. Linden Homes support the provision of an effective and sound Joint Spatial Plan (JSP) to guide development (which should be put in place as expediently as possible). However the JSP must be positively prepared, justified, effective and consistent with national Policy, and with regard to these considerations we are concerned that the JSP, as drafted, is unsound for two key reasons. Firstly the proposed JSP Evidence Base is flawed in its assessment of housing needs and does not provide for the Full Objectively Assessed Housing Needs for the sub-region. Secondly the proposed JSP Strategy does not include a sufficient contingency allowance for any slippage in delivery or potential non-delivery of sites – planning for additional contingency will provide greater likelihood of meeting necessary levels of development consistently over the Plan Period.

We have serious concerns regarding the Methodology and Evidence Base used to determine the proposed level of housing growth currently identified in the JSP Publication Document. On behalf of Linden Homes, Representations to the JSP have been prepared to object to the suppressed housing requirement currently proposed. With regard to the South Gloucestershire New Local Plan Consultation Document, we consider it essential that this makes provision for an appropriate level of housing growth to be delivered across the Plan Period. Whilst the Local Plan must conform with the JSP, this Plan is yet to be examined and it is our view that the housing requirement will need to be substantially increased.

| | |
|---|---|
| | Thornbury has been identified as a Strategic Development Location set to deliver a 'maximum of 500 dwellings.' We have objected to the proposed reduction in units at this Strategic Development Location from 'up to 600 dwellings' as was proposed in the Emerging Spatial Strategy version of the Plan (November 2016) to 500 as was stated in the submitted version of the JSP. Thornbury is a sustainable location for development within South Gloucestershire and opportunities to increase delivery in this location should be fully explored.<br><br>**Comments on Strategic Development Locations (Paragraphs 2.30 - 2.46):**<br><br>Linden Homes supports the identification of Thornbury as a Strategic Development Location (SDL) within the JSP, and for relevant land to be allocated for development within the new South Gloucestershire Local Plan. Thornbury is a main town within South Gloucestershire and a location which is suited to the provision of additional development, where there are a range of existing services, facilities and employment opportunities, and the potential for these to be improved and enhanced, including the provision of improved Public Transport connections.<br><br>The JSP Vision for Thornbury is that the town will provide further high quality housing which will contribute to sustaining the Town Centre and contribute to meeting needs in the Northern of the District. The Draft JSP identifies potential development locations at Thornbury (on the Concept Plan which forms part of the submitted JS) to the North and East of the town. Linden Homes' development site at Post Farm is within these broadly defined areas and the additional land controlled by Linden, presents a logical location for further development to extend that which is already committed.<br><br>Whilst we support the emerging new Local Plan including the identified Strategic Development Locations as set out in the Emerging JSP, no explanation is provided in the Plan or associated Evidence Base as to why the proposed development figure for Thornbury has been reduced from 'up to 600 dwellings' as was proposed in the Emerging Spatial Strategy version of the Plan (November 2016) to the 'maximum of 500 dwellings' as is now proposed in the Publication version of the Plan. Thornbury is a place with a vibrant Town Centre and a range of employment opportunities as well as other services and facilities, all of which could/would be enhanced through further planned growth and development – evidence has not been presented to justify why development at this key Strategic Development Location should be limited to 500 dwellings.<br><br>In line with the intentions set out at Paragraphs 2.41 - 2.46 of the new Local Plan Consultation Document we support the Council's intentions to produce more detailed Policies setting out how the Strategic Development Locations identified in the JSP will come forward, and would stress the need to engage with Developers and Landowners regarding Consultation on the proposed details for such Policies.<br><br>We hope our Comments assist in the effective preparation of the new Local Plan. We look forward to participating in further stages of the Plan preparation. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | National Grid |
| **Comment ID** | 16477409/2058 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sir/Madam,<br><br>**South Gloucestershire Council: Local Plan Consultation**<br><br>**SUBMISSION ON BEHALF OF NATIONAL GRID**<br><br>National Grid has appointed Amec Foster Wheeler to review and respond to Development Plan Consultations on its behalf.<br><br>We have reviewed the above Consultation Document and can confirm that National Grid has no Comments to make in response to this Consultation.<br><br>**Further Advice:**<br><br>National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal Comments in confidence during your Policy development, please do not hesitate to contact us.<br><br>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of Plans and Strategies which may affect our Assets. Please remember to Consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your Consultation Database. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alan Jones - Hanham District Green Belt Conservation Society |
| **Comment ID** | 17236353/2059 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Hanham District Green Belt Conservation Society:<br><br>Hi , |

| | |
|---|---|
| | Following the 'Drop-In' session at Hanham Community Centre, we have examined the Local Plan Assessment Proposed Methodology Document and, whilst understanding the approach, have a number of concerns:<br><br>1.0 Introduction *[Page1]:*<br><br>We cannot reconcile Clause 1.2 which implies that the HELLA process will be subject to modification if the Consultation Responses do not reflect the views of SGC Planners!!<br><br>Surely the process is 'tried and tested' and therefore the need for 'updates' to the process is unnecessary?<br><br>2.0 Purpose of the HELLA [*Page1]:*<br><br>Reference to NPPF Clause 159 ignores the parallel requirement to identify "*the scale and mix of housing and* (more importantly in the current economic situation) *the tenures that the local population is likely to need over the Plan Period…"*<br><br>Reference to Clause 161 is fatuous, as no references are made to the provision of Employment Land in our area - indeed, SGC Employment Land Survey - April 2017 identifies a continued decline in provision the 'North Fringe Area' demonstrating that more housing in this area can only mean increased commuting and thereby negating your ability as an Authority, to fulfil the Government's requirement to reduce CO2 emissions.<br><br>3.0 Assessment of Sites *[Page 9]:*<br><br>Your High Level Assessment Criteria omits the clearly defined requirement in the NPPF Document to consider Infrastructure, Historic Environment and the Green Belt - clearly intended to be preserved in the NPPF Document!<br><br>We would welcome your Comment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kate Royston - SevernNet Limited |
| **Comment ID** | 19937249/2088 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **Getting people to work across SevernNet area and the critical role of transport infrastructure and services:**<br><br>This Document is SevernNet's Submission to the S. Gloucestershire Local Plan Consultation.<br><br>**SevernNet** is an enterprise run by, and for, the businesses and communities in and adjacent to Royal Portbury Dock, Avonmouth, Severnside and Severn Beach/Western Approach industrial areas. Our membership includes the largest employers and SMEs from across the area. These include The Bristol Port Company, Nisbets, GKN Aerospace, Etex Building Performance, Lidl, Warburtons, Avara Pharmaceutical, Amazon, GENeco and Oasis Bridestowe Academy.<br><br>The **'SevernNet Area'** extends over 10 miles, and includes Royal Portbury Dock and the Avonmouth Severnside Enterprise Area(ASEA). The area is heavily industrialised, supporting over jobs with an additional expected in the next 5 years.<br><br>The area is also very poorly supported by Public Transport and the Severn Beach Line provides an essential service.<br><br>**Sustainable transport links are becoming increasingly critical** as the number of jobs and vacancies across the area grow, local numbers looking for work decrease (as unemployment shrinks) and the number of jobseekers and younger people who have a driving licence and/or have access to a car decrease. Without improvements in the local transport system the **forecast economic growth will be unachievable**.<br><br>**Rail and Bus Services:**<br><br>An essential element within the **MetroWest Phase 1 programme** is improvement to the **Severn Beach Line**. This is a vital link between Bristol and ASEA.<br><br>This service has suffered from considerable delays, cancellations and service turn backs over the last nine Months. This has had a major impact on businesses and their employees across ASEA.<br><br>A **reliable and comfortable half hourly service** to Avonmouth with **an hourly extension to Severn Beach** is required as soon as possible. The capacity to transport bicycles is also important. Cycling is an important and growing transport connector in the area to help cover 'the last mile' between the train and work/home. |

SevernNet and partners have set up, operate and manage **a local shuttle bus service** on behalf of local employers to link the train service to local businesses. It is essential that we co-operate to ensure these services are linked. This service, the SevernNet Flyer, was established in Jan 2016 as a grant funded pilot. Its aim was to link the local villages, bus and train commuters with the industrial areas in Avonmouth. Since August 2017 the service has been rebranded as the **SevernNet buzz** and is employer funded. The utility of this service is negatively impacted by cancelled or late trains arriving at Avonmouth Station damaging the ongoing viability of the SevernNet buzz. It is essential that the reliability of the service is improved and that any changes to the service, including rolling stock, are properly risk assessed and necessary resources put in place to ensure a continuing service.

The Severn Beach hourly extension is increasingly important as the potential of the area for growth increases. The Avonmouth Severnside Enterprise Area within S. Gloucester, which can be reached by Severn Beach Station is anticipated to see an additional jobs in the next 5 years. There are few alternative transport options in the area. New employers moving into the area during 2018 (Autumn) include Lidl ( staff)and Amazon ( staff).

SevernNet is working with these employers to provide extensions to the SevernNet buzz to provide more links between the train, bus services, residential areas and the Severn Beach area to complement and supplement the train. The co-operation and support of S. Glos. Council and other Stakeholders is essential to assist with this.

The **MetroWest Phase 1** rail improvements from **Portishead to Pill** have the potential to ease journeys into the SevernNet Area and are welcomed. They are also important for the local residents. Providing links from Pill into Royal Portbury Dock and across the river will be essential to improve the utility of these services, encourage more train usage and keep cars off the road. Whilst we appreciate hub and spoke service provision into Temple Meads and back out again may seem a good way to schedule, the additional journey time may well be a deterrent for people working in the SevernNet area and travelling from N. Somerset.

**Working closely together on resolving the 'last mile(s)' of the journey is essential.**

The **MetroWest Phase 1** improvements from other areas of North Somerset, in particular Weston, and the Bath side of Bristol linking into the Severn Beach Line to Avonmouth and Severn Beach are also welcomed, together with the planned MetroWest Phase 2 improvements. Local employers are recruiting further afield as numbers in Bristol seeking employment reduce.

We do have a concern with Temple Meads as a potential 'single point of failure.' Longer term options to connect travellers along the coast between Pill/Portbury and Avonmouth should be considered.

**Pilning Station:**

As the Northern end of the ASEA expands, consideration should also be given to Pilning as a station to serve an employment area likely to reach in the next 10+ years.

**Pilning** Station is situated adjacent to Western Approach, Central Park and the Westgate developments and has the potential to bring employees directly from Wales and North Bristol without additional legs into and out of Temple Meads. This would ease recruitment challenges and could reduce the impact of car journeys.

Significant numbers of commuters are travelling into Royal Portbury Dock and ASEA from Wales and these are expected to increase.

Major employers in Western Approach Industrial Park and Central Park strongly support the development of Pilning as a commuter station. These include UK Mail, Tesco Stores (Regional Distribution Centre), GKN Aerospace, Lidl, Next and Amazon.

We support the **FOSBR Rail Plan 2018** to enable 'car-free travel from your door' (see attached).

**Cycle and Walking Network:**

Improvements to the local cycle and walking network is also key. SevernNet is in discussion with Sustrans, Bristol City Council, S. Glos. Council and Highways England to establish a SevernNet Area cycle and walking network supported by an easily accessible Network Map, clear and accurate signage, a network of local cycle and walking champions and related support. An essential element for this to be successful is an agreed and funded framework to ensure cycle and walking infrastructure is well maintained; and investment can be made available for missing or poor quality sections of the network.

Many people aspire to cycle and/or walk to work either as all, or a part, of their journey. However the high levels of HGV traffic in the area, poor quality of the paths and poor signage is daunting and puts people off. A number of employers actively discourage cycling through safety concerns.

The difficulties of travelling on the train with cycles is also a constraint (for example on busy services where access for a bike is denied). There is a need for innovative approaches such as bike provision at either end of the journey.

**Road Network and Transport Planning:**

The limited capacity of the road network continues to be a concern. In particular the congestion which can be caused on the A403 between J18 of the M5 and Severn Beach through road works or other incidents.

The opening of the M49 Junction in early 2020 will make a considerable difference to traffic flows, however congestion is likely to remain a concern and subject to problems which may arise on the Strategic Road Network.

Traffic and transport in the area requires very careful management and good communication.

| | |
|---|---|
| | SevernNet would welcome a **Strategic Transport Planning exercise** with S. Glos. Council and Bristol City Council to review the carrying capacity of the local network, given the ongoing development, increasing traffic levels, impact of the removal of the Severn Crossing Tolls and the need for contingency planning.<br><br>We believe there is a need for a strategic and long term approach to transport and travel across the SevernNet area considering innovative approaches such as the **South East Wales and West of England Business (SEWWEB) Rail Link concept** (see attached). The aspirations for development and growth across the area require a commensurate investment in appropriate infrastructure to get people and goods into, across and out of the area in order for the growth to be realised and businesses adequately staffed.<br><br>See also the **SevernNet Area Coastal Community Team Economic Plan** which is available at www.severnnet.org and includes a Transport Plan. This was developed in late 2015/early 2016 and informed by local Stakeholders.<br><br>**SevernNet Sustainable Transport Forum:**<br><br>The SevernNet Sustainable Transport Forum was established in 2011/2012 and enables transport and travel related Stakeholders to meet regularly, share progress and discuss the challenges and opportunities. The Forum has led to improvements in understanding between various Stakeholders, better communication and has informed improvements to infrastructure schemes. |
| **Attached documents** | FOSBR Rail Plan 2018 Postcard.pdf (825 KB)<br>SevernNet Area Coastal Community Team Economic Plan v5.pdf (971 KB)<br>sewweb_bifold.pdf (398 KB) |

| | |
|---|---|
| **Respondent Name** | Sue Radford-Hancock - Acton Turville Parish Council |
| **Comment ID** | 1060353/2090 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **Response from Acton Turville Parish Council to Consultation on South Glos Council Local Plan**<br><br>The Parish Council does not feel that the Online Form of response to the Consultation on South Glos Council proposed Local Plan is appropriate to use for our Response and, therefore, we submit the following. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alex Atkinson - Edward Ware Homes (Land East of the A4174, Shortwood) |
| **Comment ID** | 19323937/2103 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Part 1 (Housing Requirements) and Part 2 (Spatial Strategy) Including Questions 1, 2, 3, and Strategic Development Locations<br><br>Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Edward Ware Homes (Mr. Alex Atkinson) - Pegasus Group (Mr. Daniel Weaver).pdf (2.6 MB) |

| | |
|---|---|
| **Respondent Name** | Alex Atkinson - Edward Ware Homes (Land East of Coalpit Heath) |
| **Comment ID** | 20247169/2114 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Part 1 (Housing Requirements) and Part 2 (Spatial Strategy) Including Questions 1, 2, 3, and Strategic Development Locations<br><br>Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Edward Ware Homes (Mr. Alex Atkinson) - Pegasus Group (Mr. Daniel Weaver).pdf (57.6 MB) |

| | |
|---|---|
| **Respondent Name** | Alex Atkinson - Edward Ware Homes (Land at Woodhouse Down, Almondsbury) |
| **Comment ID** | 20248001/2124 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Part 1 (Housing Requirements) and Part 2 (Spatial Strategy) Including Questions 1, 2, 3, and Strategic Development Locations<br><br>Please refer to the accompanying Report and Appendices. |
| **Attached documents** | Edward Ware Homes (Mr. Alex Atkinson) - Pegasus Group (Mr. Daniel Weaver).pdf (14.4 MB) |

| | |
|---|---|
| **Respondent Name** | The Bristol Alliance Limited Partnership (BALP) |
| **Comment ID** | 16539009/2128 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sir/Madam,<br><br>**SOUTH GLOUCESTERSHIRE NEW LOCAL PLAN CONSULTATION DOCUMENT FEBRUARY 2018**<br><br>On behalf of our Client, the Bristol Alliance Limited Partnership ("BALP"), we write in response to the New Local Plan Consultation relating to the Emerging South Gloucestershire New Local Plan ("SGLP").<br><br>The views and opinions of BALP in relation to the Emerging SGLP are set out below, together with the areas of Policy that BALP would wish to see included in subsequent iterations of the Plan.<br><br>**The Bristol Alliance:**<br><br>BALP is the owner of Cabot Circus Shopping Centre, Quakers Friars and surrounding shops in Bristol City Centre. BALP is a major investor and Stakeholder in Bristol City Centre, and an important contributor to the sub-regional economy.<br><br>With regard to its continued investment in Bristol City Centre, BALP secured a resolution to grant Outline Planning Permission in January 2018 for the major mixed-use redevelopment of a key site within the Broadmead Shopping Area, on land at and adjoining Callowhill Court, Broadmead/ The Horsefair. The Permission is expected to be issued shortly.<br><br>The following Responses are submitted in relation to the above mentioned Consultation Document.<br><br>**Previous Representations:**<br><br>Turley submitted Representations on behalf of BALP to the initial stage of the SGLP ('Prospectus Consultation') in correspondence dated 23rd February 2017 (Appendix 1). This Submission emphasised the importance of maintaining the Policy position established by Policy CS14 of the adopted Core Strategy and PSP31 of the Policies, Sites & Places DPD; and ensuring that the Plan includes Strategic Policies for Town Centres(given the omission of any Policies relating to retailing and main Town Centre uses in the Emerging Joint Spatial Plan ('JSP')). This Representation was expressed in the following terms:<br><br>*'It is of paramount importance that any Emerging Retail Policies within the SGLP carry forward the 'Town Centres first' principle established in Core Strategy Policy CS14 and Emerging Policy PSP31, and set these within an appropriate strategic context. The new SGLP should therefore include Strategic Retail Policies that reflect national guidance and the emphasis on Town Centre development, enhancement and regeneration. This should include consideration of the regional shopping hierarchy, and the relationship between Town Centres and retail locations in South Gloucestershire and those in Bristol and other neighbouring areas. The new SGLP should acknowledge the primacy of Bristol City Centre and its position at the apex of the regional shopping hierarchy.'*<br><br>This Representation is summarised in the 'Report on Engagement and Main Issues' which forms part of the current Consultation, but is not attributed directly to BALP.<br><br>**Consultation Document:**<br><br>South Gloucestershire Council ('SGC') is Consulting upon the Local Plan Consultation Document 2018 - 2036. This notes (at Para 1.12) that the Evidence Base 'will evolve as the Plan progresses.'<br><br>We note that the Retail Evidence Base has not been revised at this stage. The substantial forecast capacity for comparison goods identified in the Core Strategy, and derived from the earlier Roger Tym and Partners Study (2010), remains the Council's position on future retail need until such time this is updated.<br><br>The Draft Plan does not seek to redefine the role of Cribbs Causeway, but notes at Paragraph 1.23 that The Mall provides the largest concentration of shopping and leisure facilities in the District. Cribbs Causeway's out-of-centre status is not identified specifically in the Document. This is a key omission.<br><br>The 'North Fringe Cluster' (including Cribbs Causeway) is identified as one of the main 'Urban Localities' in the District, but there is no reference to the future of Cribbs Causeway under the sub-heading 'Key Opportunities' (Page 33).<br><br>Part 3 of the Document includes 'Policy Discussion Points.' It is stated (Paragraph 3.4) that these take account of the JSP. In respect of retail, this does not appear to be the case; none of the discussion points set out under Paragraph 3.7 include retailing (or indeed commercial development of any kind). The exclusion of Strategic Retail Policy in the JSP is effectively repeated in the Emerging Local Plan as it appears at this stage, risking the creation of a Policy vacuum.<br><br>At Paragraph 3.5 under the sub-heading 'Proposed Strategic Policies' and 'Town Centres and Retail Uses,' the Document states that the new Local Plan will replace Core Strategy Policy CS14; and PSP31 – Town Centre Uses. No further information is provided on the type, objectives or wording of any replacement Policy/Policies. Indeed and as noted above, under the 'Specific Policy Discussion Points' on Page 75, there is no reference to Retail Policy, or any Policy relating to main Town Centre uses. The Document effectively ends without any further consideration of these issues. Retail Policy considerations are also absent from the Document's Appendices.<br><br>**Key Issues:**<br><br>The Local Plan Consultation Document does not consider retailing and main Town Centre uses in sufficient detail to enable robust Policies to be developed by the Council. The future status of Cribbs Causeway is not addressed in any detail, and no reference is made to the shopping hierarchy or the need to direct new investment into existing Town Centres. The Document provides no guidance on the structure or wording of Policies |

| | |
|---|---|
| | intended to replace the existing Retail Policy Framework (Policies CS14 and PSP31).<br><br>BALP therefore requests that the Council takes into consideration the following key issues in developing further iterations of the Local Plan:<br><br>• The current Plan includes no Strategic Retail Policies. Given the JSP's current Policy position, there is a potential Policy vacuum at a local and sub-regional level. This may affect the status of shopping locations (as defined in Policy), the need for additional floor space, and where this should be located.<br><br>• A shopping hierarchy is not defined at this stage (as required by the NPPF and recent Draft revised NPPF). The primacy of Town Centres is not emphasised. Although Cribbs Causeway is referenced at various points, its status as an out-of-centre location is not mentioned.<br><br>• There is no evidence relating to future shopping and leisure needs. The Evidence Base is significantly out-of-date and potentially overstates the need for additional comparison goods floor space in the District.<br><br>• There is a stated intention to replace Policies CS14 and PSP31, but the Document provides no information on the objectives or wording of alternative Policies.<br><br>• Retailing and main Town Centre uses are not identified as specific Policy discussion areas.<br><br>• Unless these matters are resolved, there is a danger that the eventual Plan will not reflect the Town Centres' first approach; will not include Strategic Policies; and the future status of Cribbs Causeway will continue to be unclear.<br><br>**Future Stages in the SGLP Preparation:**<br><br>BALP wishes to be Consulted on subsequent stages of the SGLP. We would therefore be grateful if you would keep us fully informed of further developments as the Plan and Study emerge.<br><br>In the meantime, if you have any questions relating to the Consultation Response submitted in this letter, or any related matter, please do not hesitate to contact us. |
| **Attached documents** | The Bristol Alliance Limited Partnership (BALP) - Turley (Huw Jones).pdf (431 KB) |

| | |
|---|---|
| **Respondent Name** | Colin Gardner - TRAPP'D |
| **Comment ID** | 19845537/2134 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **South Gloucestershire New Local Plan – TRAPP'D Representation**<br><br>-<br><br>**1. Introduction and Summary:**<br><br>I am instructed to respond to this Appeal on behalf of TRAPP'D (Thornbury Residents Against Poorly Planned Development). We are an Action Group formed from residents of Thornbury who are alarmed at the impact of the speed and quantum of housing development in and around Thornbury, despite a complete lack of planning for the infrastructure needs of such a growth. We have more than registered supporters.<br><br>This current phase of Consultation seeks to channel Comments towards 18 mostly obscure Questions, such as the Policy on Travelling Showpeople, and misses the real issues of substance concerning the development of the Joint Spatial Plan (JSP) into a Local Plan. We therefore submit our Response against seven main topic areas where we think the Local Plan as written is unsound. We have restricted our Comments to those concerning the overall Strategy within the Local Plan, and the detail as it affects Thornbury.<br><br>We note that the Consultation calls for Responses on rural growth in locations such as Tytherington and Olveston, which could also have an impact on services in 'hub' towns such as Thornbury. However, we have concluded that we should leave it to those communities to make their own Comments about their particular locations, except to say that the overall housing numbers identified in this Plan already represents a far higher requirement than the population of South Gloucestershire needs, and therefore any further rural development should be justified solely on the particular local need in those communities, not to play the overall numbers game, or to pander to developers' desire to build "executive" homes in the countryside.<br><br>Finally, we note that in terms of timing South Gloucestershire is running ahead of the other three Local Authorities that are party to the JSP, perhaps mirroring South Gloucestershire's keenness to overdevelop compared to other Authorities. We would remind the Council that the Local Plan must follow the JSP, which we are intent on opposing in a number of key areas during the Examination in Public, and it is therefore important that the Local Plan does not get ahead of itself from a process point of view.<br><br>-<br><br>**2. South Gloucestershire is volunteering for far more than its share of development:** |

The Document repeatedly refers to "challenges" – as in *"… The Local Plan will respond positively to the challenges facing South Gloucestershire*" (Page 4) – inferring that the 32,500 houses in the Plan are, and would always would have been, an inalienable fact which South Gloucestershire is bravely facing up to. This is simply not the case. This number of houses will indeed be a major challenge, but it is one entirely of the Council's making.

There is no forecast which suggests that South Gloucestershire needs to provide anything like this number. It is entirely the creation of an unbalanced negotiation between the four Local Authorities, with South Gloucestershire performing the role of "Corporal Jones;" volunteering for everything. In this Section we review the demand forecasts at Local Authority level and compare that to the Plan which South Gloucestershire has acceded to.

At the JSP level the Objectively Assessed Need (OAN) of 97,600 dwellings is intended to reflect the demand from 2016 to 2036. This includes a "market adjustment" factor to reflect the supply/demand situation (15% in the Bath Housing Market Area and 10% in the Bristol HMA), and can be summarised as follows:

Please see the attached New Local Plan 2018 Document for the missing information.

The JSP then goes on to propose an overall build of 105,500, the 'excess' of 7,900 representing an 8% buffer. However, we can now use this data to compare the South Gloucestershire demand with the proposed build:

Please see the attached New Local Plan 2018 Document for the missing information.

This reveals an outrageous 35% (8,500 houses) excess in South Gloucestershire represented by a demand of 24,000 versus a proposed build commitment of 32,500. This excess is equivalent to almost three Buckovers!

In our JSP Comments we point out that the Local Enterprise Partnership (LEP) also commissioned a forecast from Oxford Economics (OE), and this forecast was used in the JSP to assess the need for 79,000 new jobs. However, this forecast also included projections for housing demand that were substantially below the SHMA used above. OE produced 3 scenarios – Baseline (their central scenario), Medium/High and a High version. A comparison of these forecasts with the proposed build is summarised below:

Please see the attached New Local Plan 2018 Document for the missing information.

The OE forecast for South Gloucestershire, after 'market adjustment' ranges from 18,600 to 22,300 in the highest growth scenario they could come up with, giving an excess in this Authority of between 43% and 31%. Furthermore, OE has given TRAPP'D a statement to the effect that their forecast was produced well before the Brexit vote, at a time when the growth outlook was far more optimistic, and that if they were repeating the exercise today they would be downgrading the forecast substantially.

We accept that Local Authorities have a Duty to Co-operate, which means that the allocation of houses may not follow the pattern of demand exactly. We also reluctantly accept that the allocation finally made within the JSP – once it has been through the Examination in Public – will be the one that the Local Plan has to accept.

However, there are consequences to this. Not only will we be tearing up more Greenfield land than we need to in South Gloucestershire, with all the environmental and other infrastructure consequences this brings, but with a requirement this far above demand, amid a shortage of building labour (now commonly agreed as the main bottleneck to building more houses), this Local Authority is in danger of being in a sub 5 year land supply situation right the way through to 2036. This is turn means that all notions of planned development will go out of the window, with speculative developers making hay by choosing their Greenfield sites according to where the price is best.

We don't know how or why South Gloucestershire has come to agree to a quantum of houses so far in excess of demand. Is it through a desire to have much more new houses in the Local Authority? Is this simply in order to facilitate Buckover as a vanity project to allow Planners the prospect of adding "Garden Villages" to their CVs? Or is it simply that this Authority negotiated poorly?

We don't know the answer. However, **the Council should come clean in this Local Plan**. The Local Plan has no choice but to take the numbers agreed in the JSP (once they are agreed – not before), but it should tell people how this compares with the demand forecast for the Local Authority and explain its logic about how it arrived at this allocation.

-

**3. Spatial solutions proposed will worsen the problems identified:**

There is a complete disconnect between the issues facing South Gloucestershire and the Spatial Plan proposed. Simply being able to identify and describe the problems does not that the Strategy proposed provides a solution – in this case quite the opposite is true. Key issues identified include:

o Para 1.24:

*The substantial levels of new development over the past half Century have not been matched by provision of essential physical and social infrastructure. There are issues to do with the quality and quantity of open spaces, sport and recreation facilities in some parts of the area.*

o Para 1.28:

*Levels of car ownership and commuting are high and congestion hotspots are a significant problem on strategic and urban roads. Investment in transport infrastructure has been insufficient to provide for the growing economy.*

o Para 1.32:

*Others are particular issues facing South Gloucestershire and the West of England including addressing congestion.*

o Key Issues on Page 16:

*SGC has experienced high levels of growth and a deficit in the provision of infrastructure to support it. This has resulted in pressure on existing infrastructure which could be exacerbated by proposed new developments.*

o Travel Accessibility on Page 16:

*South Gloucestershire's position, economic prosperity and historic underinvestment in transport improvements has resulted in:*

*o Severe congestion issues affecting economic growth, air quality, public health and quality of life;*

*o Pressure from new developments on existing transport infrastructure;*

*o Lack of access to Public Transport options including to centres of employment from some communities;*

*o Issues of accessibility from some areas which exacerbates inequality across our communities;*

o Travel Accessibility on Page 16:

*Priority for the new Local Plan [is the] …. need to address congestion and accessibility issues through a step change in the quality of our transport infrastructure, with the aim to provide for a programme of significant improvements to walking and cycling, Public Transport road and rail services, aligned to new development.*

o Environment Key Issues on Page 17:

*o Potential impact of development on landscape, heritage, ecology assets and ecosystems in the context of past levels of growth.*

*o Preserving and enhancing our valued historic buildings, archaeology, landscapes, ecology, air quality and ecosystems assets;*

o Para 2.7:

*Locations …. where …. growth might be accommodated so as to achieve the best access to existing or improved Transport Corridors and support existing or new services and facilities.*

o Para 2.18:

*High car use and limited Public Transport options to employment areas and other services are leading to increasing pressure on the Transport Network and significant problems with community isolation, congestion and poor air quality;*

In other words, there is a recognition that past Planning mistakes have been made by focussing on locations that require predominantly car-based travel, with infrastructure not being put in place beforehand, and with large scale Greenfield sites damaging our ecology and environment. Hallelujah!

We can therefore expect a focus in this Plan on Brownfield locations and smaller smart sites that either minimise the need to travel for work or leisure, or else are already (or could be) served by first class Public Transport (especially rail) and cycling/walking networks?

No?

What we get is a Spatial Strategy based around satellite development that creates a large separation between where people will live and where they work, that can only realistically be bridged by the private car. Most new homes will be on large new Greenfield sites. Thornbury will be one of the key development locations, being one of the worst served towns in the Authority for non-car transport, with large Greenfield sites around 2km from the Town Centre, requiring everyone to drive for just about everything.

In particular, the Comment under Para 2.7 about the selection of areas for growth according to the best access to improved Transport Corridors is revealed to be a complete sham by our Freedom of Information request on Buckover, whereby the acting head of Transport and Strategic Projects said that *"The A38 is still of concern. This is the strategic alternative route for the M5 and at peak times this is an extremely busy route with holiday traffic often backed through the area …. I wouldn't pursue this on transport grounds alone. But this could be 'fudged' for presentational purposes …."* (see Appendix 1). Astonishingly, Policy 7.8 concerning Buckover Garden Village still says nothing more on this topic than words to the effect that a solution will have to be found for this problem.

We reiterate – **this Plan is unsound!**

**4. South Gloucestershire should not jump the gun ahead of the JSP:**

We have already noted that the South Gloucestershire Local Plan is some way ahead of other West of England Authorities in terms of timing and is in danger of being premature given that the JSP has yet to undergo Examination in Public and will almost certainly not be adopted until towards the end of 2018 at the earliest.

Moreover, there are hints in this Draft Local Plan that South Gloucestershire is itching to see some of the largest developments come forward for Planning consideration prior to either the JSP or Local Plan being adopted.

We are deeply concerned that this Draft contains weasel words to potentially justify individual Plans for sites coming forward before adoption of the JSP/Local Plan:

o Para 2.36:

*We are also aware that there is already developer interest in some of the locations, and it is important to begin the early thinking about the master-planning of the locations in Consultation with local and community interests. This is in order to avoid piecemeal and un-co-ordinated development that may not deliver the benefits of good place-making and investment in necessary infrastructure. It can also give the Council a 'stronger hand' in resisting inappropriate proposals in advance of a robust masterplanning process.*

o Para 2.44:

*…… Where only a single or small number of landowners control a site. In this context, issues can be resolved via a Planning Application process, and/ or there may be an opportunity to release a part(s) of the SDL earlier than the rest to bring some delivery forward.*

We are aware that in the case of Buckover one of the partners to this potential development has made statements about submitting Plans this year, and we suspect the above Comments are aimed at justifying such a move. We most strongly object to any move to bring major sites forward ahead of the adoption of both the JSP and the Local Plan, and would remind the Council that where this occurs this should be construed as speculative Planning which actively undermines the Planning process, and therefore the Council should be actively discouraging this.

**6. South Gloucestershire plays lip service to the need to address infrastructure first:**

The Local Plan should be about converting the allocated housing numbers and Spatial Strategy of the JSP into an executable Plan at local level. The Planning Inspectorate guidelines (June 2016) state that "*The Plan should focus relentlessly on the critical issues and the Strategies to address them, paying careful attention to deliverability and viability. This approach may raise uncomfortable questions but the whole point of the Plan is to address the critical issues as far as possible*." Infrastructure delivery is just such an issue, and this Plan fails to address it. We have already quoted the generalisations on this topic in Section 3, but there is nothing in this Plan about what South Gloucestershire actually proposes to do.

There is nothing tangible in this Document about pressure on Schools, GP Surgeries, and car parking and very little about transport. South Gloucestershire is failing in its duty to set out its Strategy to address the challenges posed.

| | |
|---|---|
| | -<br><br>**7. The "One Public Estate" programme should count towards the numbers in the JSP for Thornbury:**<br><br>We understand that an early example of the "One Public Estate" programme relates to the proposal to relocate the Castle School 6th Form in Thornbury in order to free up additional land for housing development. We will reserve our Comments on the specific proposal once the details become clear, but for now we want to ensure that any such scheme would count towards the eventual housing target for the town. Any additional housing in Thornbury, however it is labelled, will contribute towards the challenge the town is facing from the extent and speed of new house development, and by the same token should count towards the overall housing number.<br><br>**8. Policy 7.8 (Buckover) and 7.11 (Thornbury):**<br><br>Para 2.31 refers to the JSP Policies relating to South Gloucestershire, of which Policy 7.8 concerns Buckover and 7.11 concerns Thornbury. TRAPP'D have Commented in detail on these two Policies and we attach a copy of our opposing commentary on these two Policies in Appendix 2 and 3. |
| **Attached documents** | Appendix 3_Thornbury.pdf (1.1 MB)<br>Appendix 1_FOI on A38.pdf (813 KB)<br>New Local Plan 2018.pdf (348 KB)<br>Appendix 2_Buckover.pdf (1.2 MB) |

| | |
|---|---|
| **Respondent Name** | Jackson Moulding - Ecomotive Limited |
| **Comment ID** | 20165345/2136 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear ,<br><br>I hope all is well with you. It was great to have that discussion with you on the Local Plan and the growth of community led housing (CLH) across S.Glos.<br><br>submitted our Statement yesterday for the Consultation, and I have included a copy here for your review.<br><br>There are a number of recommendations and requests in the Report, however I thought it would be pertinent to check if you had managed to speak with , and if you think there is value in us supporting the growing desire for community led housing across South Glos.<br><br>We will need to report back to Power to Change shortly, stating which Local Authorities are on board, and for us to make a Representation to Homes England and MHCLG for CLH funding support for Community Groups across the West of England region.<br><br>It would therefore be useful to have written statement from S. Glos on your support and engagement with the emerging HUB (which is now called 'West of England Community Homes CIC), so that we can formally state that the HUB proposes to work collaboratively with S. Glos Council and emerging groups in the area.<br><br>Is that something you are able to provide? Happy to discuss this further with you if you have any questions.<br><br>Secondly, it would make sense to meet up and look at how this collaboration could be developed. Particularly in the creation of an outreach programme and how that could compliment your proposed events on housing.<br><br>Lastly, would you find it useful if we met with Cabinet Member for housing for S. Glos and to help align them with how you see the growth of CLH Sector, and how it could meet local housing needs? If so, would you be able to introduce us or provide their contact details, and possibly any other Member you think appropriate.<br><br>Hope to speak soon.<br><br>Thanks so much.<br><br>**Response From West of England Community Homes to South Gloucestershire Local Plan Consultation April 2018**<br><br>**1. About West of England Community Homes (WECH):** |

WECH is a new regional “Hub” established to support and enable a vibrant, sustainable and growing community-led Housing Sector across the West of England.

Our vision is that the people of the West of England live in homes not houses, communities not streets. That houses are treated as homes not investments. That housing is affordable, and environmentally sustainable for all people regardless of background, wealth, culture. That communities are rich in social financial and environmental capital that make them safe, healthy, equitable, fair, resilient, and give people choices and hope.

WECH supports existing and new groups, we provide a consistent voice for the CLH Sector and we work with a range of partners, including Local Authorities on strategic and operational priorities to help unlock the potential of community led housing.

**2. What is community led housing?**

The current Draft of the Local Plan does little to support Community Led Housing (CLH) in South Gloucestershire. A starting point for improving support would be an agreed definition of community led housing that all parties can work with. A suggested and well used definition is included here.

Community Led Housing is residential accommodation and ancillary space and facilities developed and/or managed by local people or residents, in not for profit organisational structures. The range of models that can be adopted for providing CLH includes Self-build housing, co-housing, co-operatives, mutual housing, tenant-controlled housing, and Community Land Trusts (CLTs).

The Building and Social Housing Foundation’s (BSHF) criteria for projects to qualify as CLH are:

• Community integrally involved throughout the process.

• Community groups/organisation taking a long term formal role in stewardship of the land and the homes.

• Benefits to the local area and or community of interest must be clearly defined and legally protected in perpetuity.

CLH can involve new build, Self Build, regeneration and the use of existing buildings. CLH Groups may involve members from the same geographical area or members with a shared community interest or common link (e.g. Refugees, Older People, LGBT). The latter are often known as ‘intentional communities.’

There are three main ways in which community-led groups become involved in the CLH process as set out by the Building and Social Housing Foundation:

**Group Led:** Grass roots groups respond to local housing need or demand, or people decide to develop their own homes.

**Extension of Community-based Activity:** Existing community-based organisations with local roots decide to provide housing in addition to their current activities.

**Developer-Community Partnership:** A Local Authority, landowner, Housing Association or small builder which wants to provide housing that benefits the local area in perpetuity, draws on community-led housing expertise to recruit ‘founder members’ from within the community and support them to take over ownership, stewardship and/or management of the homes.

**The Case for Community-led Housing:**

The following is an extract from the Smith Institute Report Local housing, community living: prospects for scaling up and scaling out Community-led Housing (2016), which sums up well the multiple benefits of Community Led Housing over more mainstream approaches to market or Affordable Housing delivery:

Survey evidence for the DCLG from 2013 suggests that support for new homes from local residents is higher where local people have more control over what is built, where community participation in the Planning process is introduced, and where design of new homes is considered to be of high quality.

Community-led Housing offers a sense of community and locality, as well as:

● A belief in accountability to those who have to live with the outcomes of housing activity;

● A commitment to innovation in design and planning; and

● A belief that housing should stand within a broader community context and that housing activity should be part of a wider conception of social benefit.

According to the Building & Social Housing Foundation: Community-led Housing stands apart from other forms of supply as by definition it represents a genuine reflection of demand – homes people have invested a personal interest in, ensuring satisfaction; that are not imposed on them, ensuring support; and that they are providing in their own back yard, ensuring quality.

Benefits of community-led housing *

● Affordable Housing for local people.

● Improved quality of housing stock through the renovation and reuse of existing buildings.

● Improved affordability through low-Carbon housing, reducing utility and energy costs as well as lessening the impact on Climate Change.

● Community ownership of assets and retention of local wealth, enabling access to further funding.

● Support for local supply chains and improving the skills and employability of local people.

● Strengthened communities with increased confidence, capacity and control.

* Source: Building & Social Housing Foundation

Locality claims that there is well documented evidence of high levels of satisfaction with co-operatively managed homes, with approval ratings of services in the region of 90 percent, providing a favourable comparison with the mainstream Social Housing Sector.

**3. A Community Led Housing Policy for South Gloucestershire Council (SGC):**

WECH is already working with Bristol City Council to help it develop a Community Led Housing Policy for the City. We would like to offer this same support to South Gloucestershire. We believe that a successful Community Led Housing Sector in South Gloucestershire will help to achieve several key drivers set out in the Local Plan and in particular:

● Places that perform to a higher status economically, socially and culturally, where people want to live, work and invest in by choice.

● Opportunities for intervention by the Council where the market is unable to bring forward the development.

● Stronger focus on regeneration to realise the development potential of Brownfield sites in urban areas.

● Delivering high quality strategic growth in new neighbourhoods.

● New small-scale development to meet the needs of rural communities.

**5. Potential for Community Led Housing to Help Deliver Wider Local Plan Aspirations:**

As well as affordability, the SGC Plan identifies other relevant key issues that CLH could help to address:

● Ageing Population.

● Need for a wider range of housing types and sizes.

● Issues of inequality.

● 6,000 new homes in Strategic Locations.

● 2,900 additional homes in urban areas – more and higher density around Town Centres, redevelopment of underused land and buildings.

● 1,300 new homes in rural areas.

● Providing housing for all.

● High quality design and health impact.

● Place making which encourages active and healthy lifestyles.

● Self and Custom Build Plots (while not mentioned in the current Local PlanDdraft, these are the subject of Policy PSP42 Self-Build and Custom Housebuilding within the SGC Policies, Sites and Places Plan (PSP).

**6. WECH Response to the Local Plan:**

**Overall:**

WECH would like to see a specific Policy that promotes, supports and privileges Community Led Housing (CLH) and recognises this as a way of delivering Affordable Homes. The SGC Local Plan Consultation Document has a Section on “Private Rented Sector (Build to Rent)“ but no overarching Planning Policy approach to Community Led Housing. Whilst we support a target for Affordable Housing (35%) we would encourage

SGC to incorporate additional support for CLH, which can deliver substantially more than these Policy targets. Some CLH schemes are successfully delivering 100% Affordable Homes e.g. Bristol CLT Fishponds scheme and Lyme Regis CLT.

**Proposal 1: Promotion of Exception Sites for Community Led Housing:**

Wide use has been made by rural Planning Authorities of Exception Site Policies, which provide opportunities for rural communities to promote Affordable Housing schemes on land that would not normally be acceptable in Planning terms, e.g. on agricultural land often outside of the Settlement Boundary. Such permissions produce an uplift in value from agricultural land prices but not to such an extent as would be created by an unfettered permission for market housing. They thus provide an incentive for landowners to offer land for sale while producing a supply of affordable land for community-led projects and a legal barrier to future speculative use.

Prioritising delivery of homes on exception sites through Community-led Housing schemes where there is local demand and capacity is a valuable route to revitalising rural communities. For example, East Cambridgeshire District Council's SPD on Community Led Development has a presumption in favour of affordable CLH projects when considering proposals outside development envelopes.

The use of CLH as a delivery model on Exception Sites is likely to improve the Approval rate at the Planning stage, as it will be the local community driving the project forward rather than a developer or a Housing Association. The community has a vested interest in what is created near them, and often can be a significant opposition to external led development on Exception Sites. A Housing Policy which therefore enables the community to lead in the design and in the development using an interpretation of the Exception Site Policy, could increase the turnaround of new homes on smaller sites across the Council region.

We would like to propose undertaking work with SGC to map the potential for delivering Community Led Housing within rural areas on Exception Sites.

**Proposal 2: Supporting SGC to work with communities to consider "growth" in rural areas and the role that CLH can play:**

As above, WECH would like to propose undertaking work in partnership with SGC to assess the potential for Community Led Housing as one of the routes for delivery of the 1,300 new homes proposed in rural areas. This Mapping could include looking at: opportunities, local housing needs, delivery mechanism, community capacity. This could include working with communities in some or all of the rural locations identified in Appendix 1 of your Consultation Document. We think this could really help SGC develop positive and productive dialogues with these communities, through which communities could exercise more control over rural growth and be able to share in the benefits of local housing development (including local lettings/allocations).

**Proposal 3: Urban Exception Site Policy for Community Led Housing:**

The Smith Institute, funded through the Nationwide Foundation, investigated the growth and development of the Community Led Housing Sector, which resulted in a number of key recommendations. Some of these were around the role of Local Authorities and support for emerging groups.

*"Recommendation 7: The Sector should work with Local Authorities on how to make Planning more accessible to community-led groups, bearing in mind their more limited access to support and resources."*

https://smithinstitutethinktank.files.wordpress.com/2016/01/local-housing-community-living.pdf

One of the ways Local Authorities can support in making Planning more accessible is to create a dedicated Policy for CLH along the lines of the Exception Site Policy for Affordable Housing. This would enable a clear procedure for groups to follow to enable them to create an affordable CLH housing project in an urban setting.

So far there have been few attempts to develop an urban model of an Exception Site Policy, but such an approach would have advantages in the urban areas in South Gloucestershire, where land of all sorts is in demand and where average prices for housing land can sometimes equate to  per plot and above. An Urban Exception Site Policy would therefore need to look at other classes of land where a Planning justification for permitting a Change of Use to residential development within an affordable, community-led framework might occur. Such instances might include underperforming or surplus open land e.g. within residential neighbourhoods where, size, position, need for remediation or lack of linkage to other open land limits Biodiversity and amenity value. There might also be sites with existing industrial uses where a tightly bounded residential permission could help to resolve historic 'bad neighbour' uses, or where the economic value of employment land could be enhanced with a residential element such as some live/work space or studio provision with accommodation above. Finally, there may be vacant and underused land in urban centres that would benefit from a community led approach given the sensitivity of their location and potential opportunities and threats.

**Proposal 4: Mechanism for restricting residential land use to affordable, community led development i.e. a new CLH designation:**

As above, WECH would like to see how the Local Plan and associated Site Allocation Policies could be used to restrict land use to affordable community led development on some schemes. WECH would like to work with SGC to consider whether a Community Led Housing designation could be included in the Plan. We would also like to explore the role that a Supplementary Planning Document could play in helping to achieve this Policy goal through setting qualifications, expectations, criteria, and limitations (e.g. future sales).

The example sites in neighbouring Bristol - Arnside and Glencoyne Square (Southmead) and Bridge Farm (Eastville) - provide useful Case Studies where communities are showing a willingness to consider a Change of Use from open space, but only if there is a long-term stewardship and community benefit outcome. Communities often resist Changes of Use to residential if they are seen to fuel land speculation and private, poor-quality development with no long-term community benefits.

**Proposal 5: SGS to broaden its approach to Self-Build to include other forms of Community Led Housing:**

WECH are pleased that SGC has successfully adopted a Self-Build Policy and employed a Self-Build Officer. However, we cannot see where this is referenced in the Local Plan or how the Local Plan will help deliver the Policy objectives. Community led schemes need to have sufficient scale (ideally between 10 and 100 units) to create community connections through a broader use mix including live/work units, shared communal facilities and green spaces. WECH would therefore like to explore with Officers how some of the Self-build opportunities that the Council is required to provide under the Self Build and Custom Housebuilding Act 2015 could be delivered under Planning Consents that require individual

| | |
|---|---|
| | units to be set within a community-based governance framework such as a Community Land Trust, that could ensure that community facilities are also provided and that land is stewarded for the local community for the long term.<br><br>**Proposal 6: Other approaches to CLH land supply:**<br><br>WECH promotes the approach of incorporating CLH 'quotas' into the Approval Conditions on large residential proposals. This could be through Section 106 Agreements or direct requirements for developers to partner with CLH Groups to deliver a percentage of CLH homes on their site. This would work well for SGC Strategic Development Locations.<br><br>**Proposal 8: Governance Framework for windfall CLH Opportunities:**<br><br>WECH is working with Bristol City Council on a Governance Framework for land allocated for CLH uses to be 'held in trust' while potential user groups develop a business case for a scheme. We would welcome an opportunity to work in partnership with SGC to develop a model that would work for South Gloucestershire.<br><br>**Proposal 9: 'Light-Touch' Procedures and other BCC Support for CLH Applications:**<br><br>WECH would like to see the establishment of a light-touch procedure for small sites and small groups which provides flexibility for CLH schemes. This could include free Pre-application Consultations and other dedicated SGC Planning support for CLH projects. By way of example, the Greater London Authority has a way of fast tracking community led and Policy compliant Affordable Housing schemes. We would also like to see flexibility for CLH projects whose models do not necessarily fit well with current Policy and guidance. So, for example, community-led projects which propose smaller individual accommodation with communal facilities may not meet space standards unless the communal facilities are included. Similarly, different design priorities such as large windows (potential to be overlooked), balconies, shared storage and waste collection, car parking etc may not fit Policy requirements because they are about a different more communal way of living.<br><br>**Proposal 10: Working with communities and partners:**<br><br>Before the next iteration of the Local Plan we would like to work with SGC to run a series of CLH awareness raising and capacity building workshops across the Local Authority area. This would be a way of identifying existing and potential new CLH projects. This information can then help inform the next iteration of the Local Plan.<br><br>This approach has been demonstrated to be successful in other areas - for example, in Chichester District a dedicated Rural Enabler has been promoting the benefits of CLH extensively to Parish Councils and communities. A Mapping exercise led to initial expressions of interest, with committed groups now moving forward.<br><br>**7. In conclusion:**<br><br>We would like to propose a meeting with SGC Planning Policy Staff to discuss the detail of this Response and the proposals within it, and to work collaboratively with SGC to develop Policies that can enable the CLH Sector in South Gloucestershire to expand and flourish.<br><br>**West of England Community Homes (WECH)** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Paul Davis - Persimmon Homes Severn Valley |
| **Comment ID** | 3553569/2139 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **Response on the South Gloucestershire Local Plan 2018 - 2036**<br><br>The following Comments are submitted on behalf of Persimmon Homes Severn Valley (PHSV).<br><br>**1. Population and Housing:**<br><br>1.1 Generally the issues raised of an ageing population, affordability and need for a wider range of housing, are common to the West of England generally and also much of the rest of Southern England. As elsewhere they will not be addressed unless the Plan allocates sufficient housing in the first instance.<br><br>1.2 Therefore we note that the Population and Housing Priority states that the Joint Spatial Plan (JSP) has identified how much new housing is needed. However, the figure proposed in the Submission version of the JSP has yet to be assessed at Examination and we do not consider it is sufficient to meet the needs of the West of England as a whole and South Gloucestershire specifically, because it is based on an inadequate OAHN. This under estimates the housing need and does not provide a boost to housing as required by National Guidance. We consider the overall requirement for the West of England considerably exceeds the JSP OAHN assessment of 102,200. There are also likely to be additional impacts arising from the Urban Living Strategy which will affect South Gloucestershire as 60% of its population lives in the urban area. However, most of the urban area in South Gloucestershire is suburban, where there will be less opportunities to substantially increase densities, as proposed in the central and urban core of Bristol, which includes the development of tall buildings where appropriate.<br><br>1.3 In registering our disagreement with, and objection to, the proposed housing numbers for South Gloucestershire, it is not necessary to rehearse all the arguments here, because the matter will be determined following the Examination of the JSP. However, one of the impacts of an inadequate OAHN and resulting assessment of housing requirements will be an extended JSP Examination with consequent delays in the progression of the Local Plan. There is a substantial amount of evidence submitted by a number of organisations across a variety of sectors which demonstrates the JSP housing figures are too low. However, one important source is that provided by the Government's proposed standard Methodology for the calculation of OAHN, which provides a consistent approach for comparative purposes. That demonstrates an OAHN for the West of England of |

116,500 dwellings, but as this figure is based on household projections and affordability alone and excludes any uplift to support economic growth, the resulting housing figure would be higher.

1.4 Equally the Local Plan relies on the JSP proposals for 8,500 dwellings from Strategic Development Locations. These also have yet to be tested at the JSP Examination and if any of these proposed SDLs were found not to be deliverable there would be an impact on the housing land supply.

1.5 The other consistency issue concerns the timeframe of the South Gloucestershire Local Plan of 2018 - 2036 which does not coincide with the JSP timeframe of 2016 - 2036. The JSP provides the strategic context for the Local Plan and it is important that the timeframe of the 2 Plans is aligned. In the first instance this is necessary to ensure there is no ambiguity in meeting housing figures and in assessing 5 year housing land supply. Then, in respect of emerging NPPF and NPPG guidance, in assessing the Housing Delivery Test and the requirement for Strategic Planning Authorities to prepare a Statement of Common Ground for Planning matters across Local Authority boundaries to demonstrate compliance with the Duty to Co-operate.

1.6 There is also an issue particular to South Gloucestershire – the need to provide for housing arising from the construction phase of Oldbury nuclear build. It is important that the impact of this project on the local housing market is not under estimated. However, the issue is not addressed in the JSP Wider Bristol SHMA either in Volumes 1 or 2, so the Council have no evidence to assess the appropriate provision.

1.7 It is instructive to compare this position with a similar issue which was recently addressed at the Sedgemoor Local Plan Examination in relation to the Hinckley Point C new build. Here the issue was at least considered in the Somerset SHMA, but in doing so it only raised a number of unanswered questions which will equally arise here. These include the following key messages identified in the concluding section of the Chapter on Hinckley from the Sedgemoor SHMA:

*1. 'It is difficult to be definitive regarding the proportion of the construction workforce (and particularly peak workforce) which might live in different accommodation sectors.'*

*2. 'The evidence of capacity within the PRS . . . is relatively weak . . . will the construction workforce provide an additional stimulant to growth in the PRS?'*

*3. 'The qualitative analysis undertaken suggests that landlords are reluctant to provide furnished accommodation . . . this issue could have a notable impact on the scale of the construction workforce which could be accommodated in the PRS.'*

*4. 'The issue perhaps is more one of competition for cheaper properties within the lower quartile (where) there is potential for competition with other tenant groups.'*

*5. 'How many households will . . . want to accommodate construction workers?'*

*6. 'The evidence does not suggest that the owner occupier demand is generated by the HBC construction workforce will have a notable impact on the housing market.'*

*7. 'The project position will evolve quickly.'*

*8. 'It will therefore be important for the Council to monitor and review impacts on the housing market and to maintain a dynamic view of housing need.'*

1.8 We consider South Gloucestershire should consider all the above issues in relation to Oldbury.

**2. Local Economy:**

2.1 We agree that an important priority for the Local Plan is to embrace the Growth Agenda. However, it is important that the Growth Agenda is embraced in its entirety, including provision of a sufficient housing to support economic growth. In this respect housing should be regarded in the same way as other infrastructure as necessary to support the economy and as identified delivering a range of job opportunities accessible to all communities.

**3. Infrastructure and Service Provision:**

3.1 Whilst new development might create new opportunities to ensure infrastructure, services and facilities are provided, it is important that provision required from new development is properly assessed and meets CIL and obligations tests to be necessary, directly related and fairly related in scale and kind to the development and also assessed in viability terms. The burden for meeting requirements largely falls on residential development.

3.2 The Council will need to take into account the direction of travel regarding financial and Viability Assessments set out in the Draft NPPF and its accompanying Draft Guidance Documents. These mark a substantial shift in the way viability is to be assessed, favouring Plan wide assessment over site level assessment.

3.3 Draft NPPF58 says *'where proposals for development accord with all the relevant Policies in an up-to-date Development Plan, no viability should be required to accompany the Application.'*

3.4 This is supported by Draft Planning Guidance which in the Section on viability and Plan making under the heading How should viability be assessed in Plan making? says:

*'The role for Viability Assessment is primarily at the Plan making stage. Drafting of Plan Policies should be iterative and informed by engagement with landowners, developers, infrastructure and Affordable Housing providers. Plans should be informed by evidence of infrastructure and Affordable Housing need and an assessment of viability that takes into account all relevant Policies, local and national standards including for developer contributions. Viability Assessment should not compromise the quality of development but should ensure that Policies are realistic and the total cumulative costs of all relevant Policies is not of a scale that will make development unviable.'*

3.5 The paragraph which follows that explains that this should be assessed using site typologies.

Then, under the heading Should viability be assessed in decision making? the guidance says *'the use of Viability Assessment at the decision making stage should not be necessary. Proposals for development should accord with the relevant Policies in an up-to-date Development Plan and where they do no Viability Assessment should be required to accompany the Application.'*

3.6 It is important that the Council takes this National Policy Guidance on board, supported by appropriate evidence, in preparing the Draft Plan.

**4. New Local Plan Strategy for Development:**

4.1 Firstly we agree it is important to continue the delivery of the Core Strategy allocations.

4.2 Secondly the Local Plan will need to demonstrate how the 2,900 additional urban living dwellings will be delivered.

4.3 Delivery of Strategic Development Locations – whilst we support the principle of a SDL at Yate, as set out below, we do not consider the proposal in the JSP and the Local Plan is the most appropriate Strategy when measured against alternatives, or that the land South of the railway line provides the most appropriate contingency site in comparison with the alternative of land East of Chipping Sodbury.

**7. Land East of Chipping Sodbury:**

7.1 Persimmon Homes Severn Valley control 67 hectares of land East of Chipping Sodbury. Details are set out in the Document attached with this Response as Appendix 1. PHSV consider this land provides a deliverable opportunity controlled by a single developer in a sustainable location and would provide for:

- Meeting additional housing numbers;

- As a replacement for any proposed allocations found to be undeliverable;

- As an alternative to release of Green Belt land in Yate;

- To provide a buffer against potential delivery problems at Engine Common, which is in multiple small ownerships;

- Or if it is not required to meet the above circumstances as a preferable or additional contingency site to the release of Green Belt land South of the railway line.

7.2 In Policy terms the land is outside the Green Belt and adjacent to the boundary of Yate/Chipping Sodbury which in the South Gloucestershire Core Strategy and in the JSP SA are assessed as a single urban area which is the fourth largest settlement in the West of England sub region. Yate and Chipping Sodbury have distinct but complementary centres which provide a wide range of shops, services and facilities and Yate has a railway station. This is a very sustainable location for further development as demonstrated by the allocation of a 2,700 dwelling new neighbourhood in the adopted South Gloucestershire Core Strategy.

7.3 The land was previously promoted at the South Gloucestershire Core Strategy, where the Inspector rejected any concerns about the impact development on the Cotswold AONB and said a mixed use scheme in this location offers similar opportunities as the new neighbourhood to increase with the self containment of the settlement.

Implications of Removing Land from the Green Belt at Yate:

7.4 Removing land from the Green Belt is not a decision to be taken lightly, as demonstrated by the words in NPPF Paragraph 79:

*'The Government attaches great importance to Green Belts. The fundamental aim of Green Belt Policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.'*

7.5 The highlighted parts of this Paragraph demonstrate the overwhelming importance attached to Green Belts and provide the context for the very high tests involved if land is to be removed from the Green Belt, as discussed below.

7.6 It is significant that the concept of permanence is referred to twice in a single sentence of this Paragraph. This is particularly important in respect of the land South of the railway line at Yate and Chipping Sodbury. Land South of Chipping Sodbury was a late edition to the Green Belt through the Avon County Structure Plan Policy GB4 in 1985. This makes it doubly important that the land is not taken out of the Green Belt now as it would contravene the concept of permanence embodied in Green Belt Policy. It is not appropriate for Authorities to include land within the Green Belt and then take it out again later without full justification and proper assessment of alternatives. If alternatives exist the presumption should be against taking land out of the Green Belt.

7.7 Paragraph 80 of the NPPF then sets out the five Purposes of Green Belt which themselves have considerable longevity, and remain unchanged from the previous guidance in Planning Policy Guidance Note 2. However, these tests have been used in isolation as the sole basis for the JSP Green Belt Assessment, in two Documents, Part 1, November 2015 Stage 2 in November 2016. Paragraphs 83, 84 and 85 of the NPPF include a number of other more detailed considerations for the review and definition of Green Belt boundaries:

7.8 We note that these are not referred to in either of the JSP Review Documents and none of these factors have been considered or assessed against potential releases from the Green Belt. In respect of the specific issues relating to the proposed release in Yate/Chipping Sodbury we have particular concerns on the following issues raised by this guidance:

- Paragraph 83 emphasises the permanence of boundaries in the long term and 85 says boundaries should be clearly defined using physical features that are recognisable and permanent (again). The current boundary South of Yate formed by the railway line clearly is clearly defined by a permanent physical feature which makes is absolutely unequivocal. Breaking this into an area of open countryside which in landscape terms extends as far South as the M5 Motorway does not enable a clear, permanent and defensible boundary in the long term.

- Paragraph 84 refers to the need to promote sustainable patterns of development. So, a Green Belt Review also needs to consider where development could be located not just where it should not be located and include potential sites outside the Green Belt;

- Similarly, Paragraph 85 says there should be consistency with the Local Plan Strategy for meeting identified requirements for sustainable development and as the above analysis shows the land East of Chipping Sodbury performs well in meeting the SA objectives.

7.9 Paragraph 5.10 of the JSP Green Belt Assessment November 2015 sets out subsequent stages of a review of a Green Belt. This says, *'The subsequent stages will therefore consider the impact of removing any locations from the Green Belt as well as considering the effect on the integrity of the remaining Green Belt area.'* This has not been done in the Stage 2 Assessment Document. In reality, the assessment repeats previous assessments by the Council of the Green Belt in South Gloucestershire in 2006 and 2011, by considering how the identified Cells fulfil the Purposes and function of Green Belt. This limited exercise provides a subjective view of each Cell which is unrelated to a Sustainability Appraisal of strategic development opportunities and options, both inside and outside Green Belt and it does not balance the loss of open land against other Planning considerations. It does not therefore provide any basis for the current Consultation process.

7.10 There are also issues regarding the definition and boundaries of individual Cells which effects the treatment of the land South of Yate/ Chipping Sodbury. Paragraph 4.1 of the November 2015 JSP Green Belt Assessment Document sets out a brief explanation of the definition of the 79 assessment Cells. Critically this says *'Cell definition reflects the need for the assessment to provide greater detail around the inner edges of the Green Belt and adjacent to larger urban areas. In these areas smaller Cells have been defined compared to those in areas further from the larger built up areas.'*

7.11 We note that the two Cells South of the railway line at Yate/Chipping Sodbury, Cell 23a (158 hectares) and 24a (196 hectares) are extensive Cells forming large areas of open countryside not conducive to defining potential development areas South of Yate and Chipping Sodbury. The definition of these Cells using landscape criteria clearly demonstrates land South of Yate and Chipping Sodbury is part of a substantial landscape area which should be treated as one. This confirmed when the specifics of the Cells are looked at in greater detail.

7.12 It is also significant that the 2006 and 2011 South Gloucestershire Green Belt Assessments did not carry an assessment of all of the Green Belt in South Gloucestershire but identified specific areas for assessment and consideration of whether there was a case for releasing them. We note that neither assessment included the land South of Yate and Chipping Sodbury.

7.13 Equally, notwithstanding our overall objection to the inadequacy of the process, the actual details of the JSP assessment, equally does not justify the approach. The area South of Yate and Chipping Sodbury sits on the boundary of the two assessment Cells 23a and 24a and the overall conclusions in Paragraph 3.20 of the November 2016 Document says:

*'Cells to the South and West of Yate are assessed as making a contribution to Green Belt Purposes. Cells contribute to preventing the merger of neighbouring towns in the corridor between the North Fringe of Bristol and Yate by assisting in preventing the coalescence of settlements. Most of the Cells also contribute to assisting in safeguarding the countryside from encroachment.'*

7.14 This is in contrast to the conclusions in Paragraph 3.21 for Cells 22b and 21d where it says:

*'Cell 22b, North of Engine Common and 21d, West of Yate are identified as making a limited contribution to Green Belt Purposes.'*

7.15 Therefore in the light of these conclusions it would clearly be appropriate to consider Cells 22b and 21d for potential Green Belt release, if necessary and at the right time but that Cells 23a and 24a should remain as Green Belt.

7.16 Indeed this position specifically in relation to Yate and Chipping Sodbury is also matched by the overall assessment in the November 2016 Document. So, notwithstanding our Comments on the lack of proper assessment of a wider range of issues, even this narrower overall assessment does provide a view on the core Purposes of the Green Belt. Paragraphs 3.32 to 3.39 identify that of the 146 Cells assessed only 12 are identified as making a limited contribution to Green Belt Purposes and these do not include Cells 23a and 24a. Therefore, it can be concluded that the contribution Cells 23a and 24a make to safeguarding the countryside from encroachment is considered to be a significant contribution to the purposes of the designation of the Bristol and Bath Green Belt.

7.17 We consider it is inappropriate to release land from the Green Belt South of Chipping Sodbury for the following reasons:

- It requires land to be removed from the Green Belt;

- The land has extensive views of the surrounding area;

- It requires funding for new rail crossings;

- It requires land assembly and here we note that the land was not shown as being identified and promoted in the Document entitled *'West of England Joint Spatial Plan Schedule and Mapping of Sites Submitted in Response to the Issues and Options Consultation,'* November 2016;

- It will be held back until the latter part of the Plan Period – i.e. it is not available, not achievable and not deliverable, in an Authority where deliverability of allocations in previous Plans has been a particular problem.

7.18 The JSP and the Local Plan will also need to take into account emerging guidance in the Draft NPPF which includes a significant change to the way Council's should assess the release of land form the Green Belt. New Paragraph 136 says:

*'Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic Plan-making Authority should have examined fully all reasonable options for meeting its identified need for development.'*

This is supported by recent Case Law and the High Court Judgment by Mr. Justice Jay in Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council & Gedling Borough Council and Peveril Securities Ltd & UKPP (Toton) Ltd. This showed that it is not appropriate to release land from the Green Belt and reassess exceptional circumstances in a lower order Plan unless the higher order Plan has determined in the first instance that exceptional circumstances exist for the lower order Plan to do this. The JSP does not do this and enable the South Gloucestershire Local to propose further changes to the Green Belt.

7.19 In respect of this guidance, the JSP Green Belt assessment is only an assessment of land within the Green Belt. It does not, as an integral part of that assessment, contain any consideration of alternatives, either inside or outside the Green Belt.

Assessment of Land East of Chipping Sodbury Against JSP Sustainability Appraisal Objectives:

7.20 Therefore PHSV consider it is inappropriate to identify land in the Green Belt in preference to this land. This approach is also not justified when the land is assessed against the sustainability objectives of the JSP November 2016 Sustainability Appraisal. We have therefore assessed the land against these Sustainability Assessment objectives as follows:

1a – Site has potential links to recreation facilities.

1b – The A432 and railway line provide a strong defensible Southern boundary.

1c – The site is over 1 kilometre from health facilities but a new Health Centre could form part of a proposed mixed use centre.

2a – It is within the wider Bristol HMA (general assessment applying to all areas in Yate/Chipping Sodbury).

2b – No specific issues (general assessment applying to all areas in Yate).

2c – The nearest community centre is 1 kilometre away but a new community centre would form part of the proposed mix use centre.

2d – There are Primary Schools in Chipping Sodbury and Old Sodbury.

2e – Site is within reasonable distance of a Town Centre (and we would add also the Waitrose supermarket at Chipping Sodbury).

2f – It is not in a disadvantaged area (general assessment applying to all areas in Yate/Chipping Sodbury).

3a – The site has good access to the strategic road network (general assessment applying to all areas in Yate/Chipping Sodbury).

3b – There is a variety of employment in Yate and Chipping Sodbury (general assessment applying to all areas in Yate/Chipping Sodbury).

4a – There are remnants of a Medieval deer park (see Comments below).

4b – Notwithstanding proximity to Sodbury Common and the River Frome there are no ecological constraints, subject to providing adequate buffers which the Concept Plan does.

4c – The landscape is considered to be of high sensitivity which applies to much of the area around Yate but the proposed scheme includes a substantial amount of open space and landscaping.

4d – All locations in Yate/Chipping Sodbury are Greenfield.

4e – In common with all areas the land is Grade 3 and Grade 4 agriculture (but noting Yate West includes Grade 2 where development is proposed).

4f – Parts of the site are in a high Flood Risk area, but these areas are not proposed for development and the implementation of the development will protect dwellings in St. John's Way from existing Flood Risk.

4g – As 4f.

4h – No ground water source protection zones or drinking water safeguard zones (general assessment applying to all areas in Yate/Chipping Sodbury).

5a – Site is within walking distance of Chipping Sodbury Town Centre but not the station and would require enhancement to bus services which would be provided as part of the development.

5b – There are no existing heat networks and no locally specified issues (general assessment applying to all areas in Yate/Chipping Sodbury).

7.21 This is another major problem of the JSP assessment, that the SA and Green Belt Assessments are entirely separate. Given that the land is outside the Green Belt, there is nothing in the SA assessment which would prevent development and further demonstrates and, as referred to in Paragraph 7.19 above, had the Green Belt assessment properly considered alternatives outside the Green Belt, its conclusions would have been substantially different.

7.22 The one negative impact identified concerns the need to minimise impact on and where appropriate enhance the historic environment,

Heritage Assets and their settings (4a). Specifically the first alleged impact is that Park's Farm is a *'remnant of a Medieval deer park in the historic landscape.'* However, an article in Avon Past, Winter 1979 demonstrates the area was disparked by 1605. From that time onwards the area ceased to be managed as a deer park and was tenanted and managed for agricultural in the normal way and remains so today. Therefore the only *'remnant'* of the deer park is the otherwise Listed Parks Farm building itself, which is protected by its Listing and is not part of the development proposal.

7.23 The second alleged impact is that it provides a setting to the historic core of Chipping Sodbury, but as the SA assessment itself makes clear this is now divorced from the Conservation Area by Twentieth Century development.

7.24 PHSV are also concerned that even if the land is not identified as a strategic allocation it should logically be identified as a contingency site in preference to land in the Green Belt South of Chipping Sodbury and South of the railway line.

Landscape Issues:

7.25 PHSV have carried out a Landscape and Visual appraisal of the land East of Chipping Sodbury. This shows:

- The closest part of the AONB consists of agricultural fringes of gently sloping and well vegetated regular fields which form a *'buffer'* to the AONB and are largely not perceived from the proposed development site.

- As the land form rises up dramatically towards the Cotswold Scarp, more expansive views towards the proposed development will be possible but here the Scarp is very well enclosed by mature vegetation so most of the views towards the proposed development will be restricted.

- Equally, the proposed development will be perceived set within a well vegetated lower landscape, adjacent and against the backdrop of the existing settlement.

- The proposed development will be seen against the backdrop of the existing settlement and will be difficult to perceive with distance from within the majority of the AONB and a combination of sloping land form and screening by mature vegetation.

7.26 In summary although the proposed development has the potential to be perceived from close proximity from the AONB, including from the adjacent agricultural fringes and from selected open locations within the Scarp, the proposed development will not affect the core characteristics that make the AONB special, as defined in the Cotswold AONB Management Plan. The proposed development will not influence the *'unique character, tranquillity and special qualities of the Cotswolds landscape.'* The effects of the proposed development on the AONB will not be significant.

Flooding Issues:

7.27 Parts of the land East of Chipping Sodbury are in Flood Zones 2 and 3. In addition there are existing flooding problems in parts of Chipping Sodbury affecting 100 homes and 40 businesses, which are at risk of flooding from the River Frome and its tributaries, which border the land East of Chipping Sodbury. There is a 1% chance of serious flooding each year which is expected to increase with Climate Change causing higher river flows.

7.28 In 2017 the Environment Agency Consulted on proposals to address these existing flooding problems. As a result of the Consultation, the Environment Agency has identified a preferred option. This is a combination of property level measures and the construction of a flood storage area by building an embankment dam to hold flood water in storage up stream to the East of Chipping Sodbury in an existing rural Flood Plain.

7.29 This is significant in relation to the land East of Chipping Sodbury because:

1. The proposed flood storage area would be on part of the land controlled by PHSV, which in any event would not be appropriate for development.

2. The embankment dam could be formed by an access road to the proposed development from Badminton Road which would require an embankment across the Flood Plain.

3. The implementation of the Yate and Chipping Sodbury flood alleviation scheme is dependent on the Environment Agency securing the necessary funding from Government and other sources. One of those other sources would be provided by the allocation of land East of Chipping Sodbury and the infrastructure package would accompany it.

Other Issues Relating to Yate and Chipping Sodbury and Land East of Chipping Sodbury:

7.30 The following needs to be emphasised in relation to issues in Yate and Chipping Sodbury generally and the land East of Chipping Sodbury specifically:

1. The Green Belt forms a Policy constraint at Yate which is important to protect the long term setting of the town, which needs to be respected and protected. The railway line clearly provides an appropriate and defensible long term boundary to the Southern extent of Yate and Chipping Sodbury;

2. Together Yate and Chipping Sodbury form a very sustainable growth location;

3. Chipping Sodbury itself has a wide range of facilities including education, retail, community and health facilities and access to employment;

4. There are existing good Public Transport links with the opportunity for them to be improved further.

5. The concentration of sports facilities and Chipping Sodbury Common are an important green lung and provide comprehensive sports and recreation facilities in one area within easy reach of the whole town and within walking and cycling distance of the land.

6. Chipping Sodbury High Street will benefit from new investment and enhancement including new shops and public realm and management improvements.

7. A new residential neighbourhood East of Chipping Sodbury would provide a substantial urban extension well related to the town rather than a development which is remote and separated from it South of the physical and psychological barrier of the railway line.

8. A new neighbourhood East of Chipping Sodbury would need to be supported by new facilities to cater for its own new residents. In particular the development would provide opportunities to support Public Transport with the potential to extend the MetroBus link to Chipping Sodbury, thereby improving Public Transport links to Bristol City Centre, the North Fringe, the Science Park and Emersons Green Enterprise Area from the town. In addition, there would be benefits to internal links between the two towns, including cycling, walking and Public Transport and links to Yate Station.

9. The key to a substantial new neighbourhood developing into a good place is that it should be located in the right place. Location is an important factor and the fact is a good place does not happen immediately but evolves over time. Therefore it is important that new development is located where it is closely linked to existing facilities and communities to provide a basis for it to build on. Integration, not separation and being part of an existing community helps to create a sense of belonging and provides an immediate boost to cultivating a strong new community.

10. A new neighbourhood East of Chipping Sodbury will benefit from a location close to existing facilities, including making the best use of existing green infrastructure and where new provision can be based on what is already there. IT would provide appropriate enhancement and the development would be close to existing facilities, the High Street and Waitrose supermarket, as distinct from a development South of the railway line, which requires the construction of effectively 3 new railway crossings to link the new development to existing facilities.

11. In addition the land was promoted through the Core Strategy and whilst the Council sought to resist this on the basis of views from the Cotswold AONB, the Inspector in Paragraph 127 of his Report said he was *'less convinced this would be the case' as demonstrated by our own Landscape and Visual Assessment and that 'a mixed use scheme in this location offers similar opportunities as the new neighbourhood* [allocated at North Yate in the Core Strategy] *to increase self-containment of the settlement.'* He also suggested that accessibility could be improved if it were possible to reopen the railway station at Chipping Sodbury. However that is no longer necessary as the Strategy set out in the Joint Transport Study is to improve MetroBus links and development East of Chipping Sodbury would benefit this aim and help extend the MetroBus link to the East.

<u>Land East of Trinity Lane, Chipping Sodbury:</u>

7.31 A recent Planning Application which was resolved to be granted Planning Permission subject to the completion of a Section 106 Agreement is also relevant. This concerns a proposal for 60 dwellings on land East of Trinity Road and North of St. John's Way, Chipping Sodbury. It is significant because it establishes the principle of residential development beyond and adjoining St. John's Way and demonstrates how land East of Chipping Sodbury at Park's Farm provides a logical extension between Trinity Lane in the North and Smarts Green in the South. Whilst each proposal must be considered on its merits, there are many parallels between the issues relating to the Trinity Lane Application and land East of Chipping Sodbury (and the position in relation to previous Applications at Morton Way, Thornbury).

7.32 The following issues taken from the Committee Report on the Trinity Lane Planning Application would all apply equally to land East of Chipping Sodbury:

- The site is in close proximity to the Town Centre and within walking distance;

- St. John's Way is included within bus routes;

- The site is beyond the historic core of the town;

- On the ground many of the potential views are screened by intervening vegetation and the built up area of Chipping Sodbury;

- The development will only be visible in glimpsed middle distance views from the Cotswold Scarp slope in the AONB;

- Woodland planting along the boundary on the inside of the existing hedge will assist in screening the development over time;

- It is clear that landscape planting will mitigate some of the impact of the new built form;

- Conditions can be utilised to ensure external lighting has minimal impact;

- Flooding is a local concern;

- Chipping Sodbury has a good offer of amenities;

- The site is in close proximity to the Town Centre and associated shops, services and employment, a factor of great significance and weighs heavily in favour of granting Planning Permission;

- St. John's Way is a bus route with services 47, X47, 84, 85 and 680, with further bus services in the Town Centre (and in respect of East of Chipping Sodbury Badminton Road) and the site is considered to have good access to Public Transport;

- Development will provide economic benefits of providing housing and infrastructure, formation of construction jobs and enable greater spending;

- Environmental benefits including additional tree planting (and at East of Chipping Sodbury a flooding benefit);

| | |
|---|---|
| | - Significant local benefits include Affordable Housing, market housing, public open space and highway safety improvements (together with the social benefit of flooding improvements at East of Chipping Sodbury for existing homes and businesses);<br><br>- It is a sustainable location with excellent access to shops, services, facilities and employment, which is given significant weight;<br><br>- Significant social benefits, which are given substantial weight.<br><br>Conclusion on Strategic Growth Site at Land East of Chipping Sodbury:<br><br>7.33 The land East of Chipping Sodbury can accommodate a sustainable new neighbourhood which could meet any additional housing numbers identified during the preparation of the JSP and the Local Plan, or provide an alternative to any of the proposed allocations or as a preferable contingency site to the release of land South of the railway line.<br><br>7.34 The land East of Chipping Sodbury alternative is outside the Green Belt, does not require abnormal infrastructure provision, is in the control of a single developer, would provide substantial Flood Risk improvements which would protect existing houses and is equally within walking distance of the Town Centre, but also the Waitrose store. It is therefore available, achievable and deliverable. |
| **Attached documents** | Persimmon Homes Severn Valley (Mr. Paul Davis).pdf (3.4 MB) |

| | |
|---|---|
| **Respondent Name** | Baylis Estates Ltd |
| **Comment ID** | 19740609/2156 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sir or Madam,<br><br>**South Gloucestershire Council New Local Plan 2018 – 2036 Consultation**<br><br>**Representations On Behalf of Baylis Estates Ltd**<br><br>We write with regard to the above referenced New Local Plan Consultation (February 2018). This Representation is submitted on behalf of Baylis Estates Ltd, who owns the site known as 'Land South of Merlin Road,' Cribbs Causeway. A Site Location Plan is appended to this Submission.<br><br>The site was previously covered by an embanked area created in the 1990's with spoil from the construction of The Mall. This was removed as part of enabling works that were consented under Planning Application Ref: PT15/3396/F. Subsequently, a hybrid Application for mixed-use development was submitted in December 2015 and consented in September 2017 (Ref: PT15/5319/O). A further revised hybrid was registered with the Council in March 2018 under Reference: PT18/1459/F.<br><br>The site measures approximately 5.7ha and currently comprises vacant development land to the South of the existing Venue leisure complex. The site is adjoined by Merlin Road to the North East with The Mall Shopping Centre beyond, and The Venue to the North West. The site is broadly oblong, bound to the East by Merlin Road and to the North by the access road within The Venue.<br><br>The site is also within the boundary of the Cribbs/Patchway New Neighbourhood (CPNN) as defined by the Core Strategy. Filton Airfield falls to the South and is in the process of being redeveloped as part of the CPNN to provide new jobs, homes and community facilities as well as enhanced transport infrastructure. A Landowner Framework Plan (August 2014) underpins the adopted CPNN Supplementary Planning Document. This Plan identifies the Merlin Road site as an area for commercial, retail, leisure and residential uses. The principle of development on this site is therefore considered to be established.<br><br>This Representation is submitted in response to the current Consultation on the New South Gloucestershire Local Plan Document.<br><br>**SOUTH GLOUCESTERSHIRE NEW LOCAL PLAN 2018 – 2036 (FEBRUARY 2018)**<br><br>Part 2 - New Local Plan Strategy for Development<br><br>Para. 2.3 - 2.11 – Proposed Spatial Strategy (Pages 20 - 24)<br><br>The overall Strategy for development is supported including the four elements to meet the Joint Spatial Plan (JSP) Strategy. In particular, we support the objective to complete the planned developments in the Core Strategy including the Cribbs/Patchway New Neighbourhood (CPNN).<br><br>Although the site falls within the CPNN in a critical location between new development at the former Filton Airfield and commercial developments at Cribbs Causeway, it is not formally identified for development in Policy terms. Paragraph 2.10 indicates that the North Fringe Cluster will be identified as a location for more than 'business as usual' change. We wholly support this approach.<br><br>We support the Council's proposal to set out *'long term visions for change'* set out in Paragraph 2.11 and to provide supporting site allocations for these visions. The site now benefits from Planning Permission for leisure and commercial development in line with the CPNN objectives and forms a key site that connects the planned Filton Airfield development with the commercial area of Cribbs Causeway. On this basis, it is important for the New Local Plan to recognise the contribution that Land South of Merlin Road makes to the CPNN and the site should be formally allocated as a leisure and commercial development site within the CPNN.<br><br>**Recommended Amendments:** |

| | |
|---|---|
| | In order to ensure clarity for the developer and the Council, Land South of Merlin Road should be identified as an allocated site for leisure and commercial uses on the New Local Plan Proposals Map and within a proposed North Fringe Cluster Policy, in line with the objective to complete planned developments within the CPNN. |
| **Attached documents** | Land at Jupiter Road - Site Location Plan.pdf (144 KB)<br>Land South of Merlin Road - Site Location Plan.pdf (235 KB) |

| | |
|---|---|
| **Respondent Name** | Hall and Woodhouse |
| **Comment ID** | 16757633/2163 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **1.0 INTRODUCTION:**<br><br>1.1 These Representations are submitted on behalf of Hall and Woodhouse to the South Gloucestershire Local Plan (SGLP) Consultation Document in respect of Land at The Griffin, Warmley, East Bristol.<br><br>1.2 A Plan of the site to which these Representations relate is enclosed in Appendix 1.<br><br>1.3 Land at The Griffin is located in the Green Belt in a highly sustainable location, adjacent to the A420 main route between Bristol and Chippenham. It is situated in the urban area at Warmley and comprises The Griffin Public House (in use), associated hard standing (used for car parking) and undeveloped land to the North. Excluding the Public House which is Listed and where the intention is to invest in improving this local facility, the site is circa 3 hectares.<br><br>1.4 As part of the new Local Plan, South Gloucestershire is currently looking at options to accommodate 1,300 dwellings on non-strategic sites, which are described as being capable of accommodating 10 – 500 dwellings. Land at The Griffin, Warmley is suitable for inclusion in the JSP and South Gloucestershire Local Plan as part of a larger Strategic Development Location or as a non-strategic site at Warmley.<br><br>1.5 These Representations respond to the proposed South Gloucestershire Housing Requirement (Chapter 2); the Spatial Strategy (Chapter 3); Strategic Development Locations (Chapter 4); and Non-strategic Housing Sites (Chapter 5). A Conclusion can be found in Chapter 6.<br><br>**2.0 THE HOUSING REQUIREMENT:**<br><br>2.1 The South Gloucestershire Local Plan sets a housing target of 32,500 dwellings. Hall and Woodhouse has submitted Responses to all Consultation stages of the JSP objecting that the housing requirement of 105,500 homes for the West of England is too low.<br><br>2.2 We note that on behalf of the development industry, The West of England Housing and Economic Review Update prepared by Barton Willmore (January 2017), commissioned by 10 major housebuilders and landowners concluded that the Full Objectively Assessed Need (OAN)for the West of England is a minimum of c.140,000 dwellings over the period 2016 - 2036.<br><br>2.3 In addition, the Chamber of Commerce, led by LEP directors, submitted Representations to the JSP Emerging Spatial Strategy, supplemented by a Report prepared by expert Professor Glen Bramley concluding that the housing needs arising from the four LPAs amounts to circa 132,000 new homes over the 20 year period1.<br><br>1 Further Analysis and Commentary on the West of England Joint Spatial Plan, Professor Glen Bramley, December 2016.<br><br>2.4 Therefore, as the strategic requirement is too low, it follows that the provision for housing in the South Gloucestershire new Local Plan is also too low as it takes its proportion from a housing target that does not reflect the Full Objectively Assessed Needs of the city region.<br><br>2.5 For South Gloucestershire, this underestimation will have significant social and economic implications, minimising the number of Affordable Homes that will be built, and constraining the economy by limiting the labour force available in the area to enable businesses to grow.<br><br>**3.0 STRATEGIC DEVELOPMENT LOCATIONS:**<br><br>3.1 Land at The Griffin has potential, either as part of a larger Strategic Development Location or as a non-strategic development site and Representations have been submitted to the JSP on this basis.<br><br>3.2 The West of England Authorities have the opportunity through the JSP and subsequent South Gloucestershire Local Plan process to identify The Griffin site for development and remove it from the Green Belt.<br><br>3.3 However, South Gloucestershire Council via the JSP and its new Local Plan has not identified any urban extensions to Bristol and has directed new Greenfield Strategic Development Locations (amounting to 6,000 homes) some distance from the city.<br><br>**Justification for Urban Extensions to Bristol:**<br><br>3.4 The implication of the new Local Plan's Spatial Strategy is that some of the most sustainable locations for growth, including at Warmley are overlooked.<br><br>3.5 Bristol is the main economic driver for the sub-region. This is where jobs are concentrated as shown in the table below. |

Please see the attached Document for the Table which is referenced above.

3.6 And when looking at Oxford Economics medium-high projections (2017) by Local Authority area, most of the job growth will be generated within Bristol's Administrative Area:

Please see the attached Document for the information which is referenced above.

3.7 Bristol drives the need for housing as this is where the majority of jobs are located and therefore, the most sustainable locations for growth are as urban extensions to the city. Jobs in South Gloucestershire are concentrated in the Bristol East and North Fringe and therefore, urban extensions within South Gloucestershire at Warmley would be well related to jobs and a variety of other services and facilities in the Bristol urban area within South Gloucestershire and Bristol.

3.8 The South West Draft RSS described Bristol as "**a key driver of the regional economy, with an economic influence that extends over a wide area, including as a centre for higher order services."** In addition, we note the existing levels of jobs, alongside the Oxford Economics job projections, demonstrate that Bristol will continue to be the key driver of the West of England economy.

3.9 The South West RSS recognised that the necessary provision of homes to fulfil the economic potential of Bristol could not be met within the urban area and that the most sustainable solution was to provide for a number of urban extensions to the city in the Green Belt. Whilst RSSs were revoked before the South West RSS was finalised, the point is still pertinent. Bristol requires a significant amount of housing to fulfil its economic potential and the most sustainable locations for that housing are as urban extensions to the city.

3.10 The Bristol Core Strategy Inspector's Report recognised the need for urban extensions in the Green Belt as a suitable means of addressing the additional housing pressures of Bristol. However, the lack of co-operation between the Authorities prior to the Duty to Co-operate taking effect meant there was little that could be done to enforce it at the time:

**"The only way that substantial additional housing pressures could be accommodated would be via urban extensions in the Green Belt and these would largely be beyond the city's boundary, as was proposed in the emerging RSS. The opposition of the relevant adjoining Councils to such development effectively precludes any current Strategy that sought a more comprehensive approach to potential needs and opportunities. It would be unreasonable to expect the City Council to explore cross-boundary urban extensions at a time when the neighbouring Authorities are opposed to such development and there is no higher tier of Planning being actively pursued to promote such an approach. Nonetheless, as this Plan is the first Core Strategy of the West of England Authorities to be examined, it would be short-sighted to rule out the possibility of a cross-boundary approach to development in the Green Belt in the future" (P**ara 52).

**Reviewing the Green Belt:**

3.11 Para 84 of the NPPF states:

**"When drawing up or reviewing Green Belt boundaries Local Planning Authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary."**

3.12 A background Report published alongside the JSP Emerging Spatial Strategy (November 2016) entitled 'The Formulation of the Spatial Strategy' explains the NPPF Para 84 inspired sequential process followed by the four Authorities in arriving at the Emerging Spatial Strategy (ESS)2. Page 21 of the Formulation of the Spatial Strategy Document states:

**"Therefore, in light of the conclusions reached above, the Spatial hierarchy for accommodating the outstanding 35,600 dwellings is as follows;**

**a.** ***Urban areas, both inside and beyond the Green Belt boundary:*** **i.e. Urban intensification in Bristol, Bath and Weston-Super-Mare.**

**b.** ***Towns and villages inset within the Green Belt or locations beyond the outer Green Belt boundary*****: i.e. good Transport Corridors, especially those well related to Southern Bristol (NB some of these include Green Belt land & so exceptional circumstances are included in the Paper).**

**c. Other sustainable locations including those well related to Weston-S-Mare.**

**d. If Green Belt locations are still required to meet the housing target, prioritise those which are the most sustainable, which deliver the Plan's strategic priorities and best address the Transport guiding principles."**

2 And we note that with the exception of the addition of Land at Brislington and some minor amendments to the capacity or land use mix in some of the Strategic Development Locations, the Spatial Strategy presented in the ESS Consultation Document remains broadly unchanged and therefore, the process followed at the ESS stage has been instrumental in establishing the Spatial Strategy for the West of England found in the Publication Document.

3.13 This demonstrates that the West of England Authorities have adopted an approach to the Spatial distribution of development that considers all non-Green Belt locations first (with the exception of smaller towns and villages in the Green Belt), and only considers Green Belt options around Bristol as a last resort. It is even described as a 'Spatial Hierarchy' demonstrating that the first stage takes priority over subsequent stages, with Green Belt locations next to cities coming last (Green Belt locations around towns and villages come second in the Hierarchy). This is inconsistent with the intent of Para 84 of the NPPF and does not contribute to sustainable development which is the fundamental purpose of the Planning System and is a requirement set down in law by Section 39 of the Planning and Compulsory Purchase Act 2004.

3.14 And this Spatial approach of avoidance around the immediate Green Belt Bristol/Bath hinterland appears to have arisen due to an error in the West of England Authorities interpretation of NPPF Para 84 which is expressed alongside point (a) in the Spatial Hierarchy (see above). The Authorities appear to have taken the 'towards urban areas inside the Green Belt boundary' in Para 84 of the NPPF to mean 'urban intensification' (underlined above), whereas this part of Para 84 actually states towards urban areas inside the Green Belt boundary – inside being the operative

| | |
|---|---|
| | word – i.e. land on the edge of urban areas in the Green Belt. And yet even if it was the intent of Para 84 to present a sequential approach to Green Belt Reviews, it certainly did not mean that you look at Green Belt next to the largest and most sustainable urban areas last as this would contradict the fundamental purpose of the Planning System – the achievement of sustainable development as well as conflicting with the spirit of the first sentence of Para 84 which sets out the prominence to be given to promoting sustainable patterns of development.<br><br>3.15 South Gloucestershire carries forward the JSP Spatial Strategy into its own new Local Plan, thus duplicating the same shortcomings as the Strategic Plan.<br><br>3.16 In summary, Bristol drives the demand for housing and new housing should be directed to locations closest to where needs arise – within or on the edge of the city. In the case of South Gloucestershire's new Local Plan, edge of city locations have been overlooked. The new Local Plan Spatial Strategy is inconsistent with the statutory purpose of Planning and national Policy on Green Belt as it has not taken account of the need to promote sustainable patterns of development.<br><br>**Reviewing the Green Belt:**<br><br>4.15 A Green Belt Assessment (November 2015) was undertaken by the West of England Authorities to inform the JSP. One of the main products of this work was a series of Maps of the Bristol Bath Green Belt, showing how Green Belt Cells (i.e. the Green Belt broken up into smaller components for assessment) performed against each of the Purposes of Green Belt.<br><br>4.16 The Report found an entire band of Green Belt encircling the cities of Bristol and Bath as contributing to Purpose 1 (check the unrestricted sprawl of large built up areas), Purpose 3 (assist in safeguarding the countryside from encroachment) and Purpose 5 (assist in urban regeneration by encouraging recycling of derelict and other urban land – on the assumption that the development of Greenfield Green Belt sites could compete with urban land) – albeit the width of these bands of Green Belt did vary against these Purposes. Conflicts with Purpose 4 (preserve the setting and special character of historic towns) mainly only applies to land around Bath. This leaves Purpose 2(preventing towns from merging into one another) where differences in performance do arise between locations within the urban fringe. These figures can be found in Appendix 2.<br><br>4.17 For The Griffin, the Green Belt Assessment takes the view that the Green Belt is important in respect of the role it plays in contributing to Purposes 1, 3, and 5, as is the case for the entire urban fringe around Bristol that falls within South Gloucestershire. However, Green Belt at The Griffin does not contribute towards the purpose of preventing towns merging into one another which is a critical purpose of Green Belt and hence a notable advantage, compared with some other potential non-strategic locations in the urban fringe where development would conflict with this purpose.<br><br>4.18 In identifying non-strategic housing sites, we highlight that South Gloucestershire's SA of non-strategic options finds that Green Belt locations perform better than non-Green Belt locations and thus in line with Para 84 of the NPPF, and in taking account of the need to promote sustainable patterns of development, land at The Griffin should be released from the Green Belt. In addition, housing need in South Gloucestershire (which cannot be accommodated in urban areas) is such that exceptional circumstances exist which give rise to the need to release land from the Green Belt. We note that The Griffin site is accessible and well served by a range of facilities and services and it performs better in only contributing to 3 of the 5 Green Belt Purposes, compared with others in South Gloucestershire that contribute to 4 Purposes.<br><br>4.19 We also highlight that the site contains an element of Brownfield land, suitable for redevelopment, as well as well defined defensible field boundaries – an important factor in reviewing the Green Belt, with the potential for further strengthening to further contain the site.<br><br>**5.0 CONCLUSION:**<br><br>5.1 Hall and Woodhouse object to the under provision for housing in the South Gloucestershire Local Plan which is taken from the Emerging JSP's sub-regional housing requirement which does not reflect the Full Objectively Assessed Need for the West of England. Therefore, it follows that the requirement for 32,500 homes in the South Gloucestershire Plan is too low which will have significant social and economic implications. The provision for housing should be increased to reflect the Full Objectively Assessed Need for the area.<br><br>5.2 Land at The Griffin is suitable, available and achievable for up to 100 dwellings as part of a larger Strategic Development Location or as a non-strategic site (deliverable on its own or as part of a wider non-strategic development). This could include open market housing, affordable and specialist housing for the elderly and potentially an element of Self-build.<br><br>5.3 Bristol drives the demand for housing and new housing should be directed to locations closest to where needs arise – within or on the edge of Bristol, including at Warmley. In the case of South Gloucestershire's new Local Plan, edge of city locations for SDLs have been overlooked and the new Local Plan Spatial Strategy is inconsistent with the statutory purpose of Planning and national Policy on Green Belt as it has not taken account of the need to promote sustainable patterns of development.<br><br>5.4 The new Local Plan is currently exploring options for non-strategic housing sites. Hall and Woodhouse support the further investigation of land at Warmley as a feature of Option 2 (Rural places inside the Green Belt) and Option 3 (Rural places both inside and outside the Green Belt).<br><br>5.5 Such is the housing need in South Gloucestershire (which cannot be accommodated in urban areas) that exceptional circumstances arise requiring the release of land from the Green Belt. South Gloucestershire's SA of non-strategic options finds that Green Belt locations perform better than non-Green Belt locations which are further away from the urban area. Thus, in line with Para 84 of the NPPF, land at The Griffin should be released from the Green Belt in the interests of promoting sustainable patterns of development. We note that the site is accessible and well served by a range of facilities and services and it performs better in only contributing to 3 of the 5 Green Belt Purposes, compared with others in South Gloucestershire that contribute to 4 Purposes – the main difference being it will not lead to the coalescence of towns.<br><br>5.6 We also highlight that the site contains an element of Brownfield land, suitable for redevelopment, as well as well defined defensible field boundaries – an important factor in reviewing the Green Belt, with the potential for further strengthening to further contain the site. |
| **Attached documents** | Hall and Woodhouse - Barton Willmore (Lauren Taljaard).pdf (1.1 MB) |

| | |
|---|---|
| **Respondent Name** | Newland Homes |
| **Comment ID** | 2857441/2176 |
| **Document Part Name** | Question 19 Other Comments |

| | |
|---|---|
| **Comment** | **Background:**<br><br>1.12 The four West of England Authorities of South Gloucestershire, North Somerset, Bristol and Bath and North East Somerset(B&NES) are in the process of producing a Joint Spatial Plan (JSP). The JSP will set out the overall level of growth in the region over the next 20 years up to 2036 setting out to identify: the number of new homes to be planned for; the amount of new employment land to be planned for; where these new homes and employment land will be located; and what transport and infrastructure investment will be needed in order to support the needs of the growing area.<br><br>1.13 The Emerging JSP sets the housing requirement at 102,200 homes from 2016 - 2036 and makes provision for the supply of at least 105,500 new homes in this period. The Plan states that within the existing Local Plans of the four Authorities provision is already made for around 61,500 dwellings as of April 2016. Therefore, when compared to the housing requirement figure identified above of 105,500, there are up to 44,000 additional dwellings required to be delivered through the JSP by 2036. According to the Spatial Strategy these will be made up of:<br><br>o 16,200 through optimising opportunities for development in urban areas.<br><br>o 6,860 includes an allowance for small windfall sites (i.e. 9 dwellings or below).<br><br>o 17,600 – in the Strategic Locations (sites of 500+ dwellings).<br><br>o 3,400 – Non-strategic growth (Sites between 10 – 499 dwellings).<br><br>1.14 The Emerging JSP sets the housing requirement for the South Gloucestershire Area at 32,500 dwellings by 2036. The JSP does not allocate sites, but instead identifies Strategic Development Locations (SDLs). The SGLP will therefore need to deliver the new housing and economic development outlined in the JSP. The Strategy for new development in South Gloucestershire detailed in the SGLP is made up of 4 elements:<br><br>o 22,300 dwellings from the build out of the development planned for in the South Gloucestershire Core Strategy;<br><br>o 2,900 dwellings from maximising the use of Brownfield land within the urban areas;<br><br>o 6,000 dwellings from five new SDLs (+500 dwellings) at Yate, Charfield, Thornbury and Coalpit Heath and the proposed Buckover Garden Village. The JSP also proposes a 1,000 dwelling contingency at land South of Chipping Sodbury which will only be released if it is demonstrated that housing provision is not being delivered at the levels being planned for;<br><br>o 1,300 dwellings from non-strategic sites in the rural areas (10 - 499 dwellings). The JSP also proposes a 500 dwelling contingency from non-strategic sites which will only be released if it is demonstrated that housing provision is not being delivered at the levels.<br><br>1.15 The Council has conceded that it cannot currently demonstrate a Five Year Supply of Housing Land. It is therefore imperative that the ouncil looks to allocate further sites for residential development that can be delivered in the short term. Land West of Bristol Road, Thornbury is available for development now and is non-strategic in scale. It could significantly help the Council in reaching its future housing requirement by 2036, but crucially in the short term.<br><br>**2.0 SOUTH GLOUCESTERSHIRE PLANNING POLICY CONTEXT:**<br><br>**Core Strategy:**<br><br>2.1 South Gloucestershire adopted the Core Strategy in December 2013. The Council were committed to an early review by the end of 2018, this is taking the form of this New Local Plan 2018 - 2036.<br><br>**Policies, Sites and Places Plan:**<br><br>2.2 The Policies, Sites and Places Plan was adopted in November 2017. This Plan contains detailed Planning Policies to manage new development and allocate and safeguard sites for various types of development.<br><br>**Joint Spatial Plan:**<br><br>2.3 The JSP has undergone numerous stages of public Consultation, the last being the Publication Plan Consultation which took place from 22nd November 2017 – 10th January 2018. The JSP was submitted to the Secretary of State for Housing, Communities and Local Government for Examination on 13th April 2018.<br><br>**New South Gloucestershire Local Plan:**<br><br>2.4 This current Consultation is the second stage of Consultation for the LP, the first stage was the New Local Plan Prospectus Consultation which ran between 12th January 2017 and 23rd February 2017.<br><br>**3.0 REPRESENTATIONS ON THE OVERALL STRATEGY:**<br><br>3.1 Newland Homes welcome the preparation of the SGNLP and whilst they are supportive they do have concerns over key components of the Strategy which are considered lacking in terms of achieving a robust Strategic Plan which will deliver the most sustainable pattern of growth. The following Sections look at the Emerging Plan in detail.<br><br>**Proposed Housing Numbers:**<br><br>3.2 Newland Homes understand that the housing target for the SGLP is being set within the Emerging West of England JSP. It is therefore |

appropriate to discuss the West of England housing target set in the Emerging JSP here, as any change to the JSP's housing figures will obviously effect the individual target set for South Gloucestershire.

3.3 It is Newland Homes' opinion that as it stands the JSP will not make adequate provision to address the overall housing need in the West of England (WoE) or increase the delivery of Affordable Housing. Newland Homes have submitted Representations to that effect in response to the JSP Consultation stages.

3.4 NPPF, Paragraph 47 states that to boost significantly the supply of housing, LPA's should use their Evidence Base to ensure that their Plans meet the Full, Objectively Assessed Needs for market and Affordable Housing in their Housing Market Area. Whilst the amendments previously made to the housing target (by including both Bristol and Bath's HMAs) are welcomed, concerns are still held over the currently evidenced Objectively Assessed Housing Needs(OAHN). This therefore raises concern that the JSP has not been positively prepared in relation to appropriately addressing the needs of the region.

3.5 As set out within the Barton Wilmore Report submitted in response to the JSP Publication Plan Consultation which took place from 22nd November 2017 – 10th January 2018, as well as in previous Representations submitted by other Consultants, Newland Homes share the concern that the OAHN on which the Plan is based is significantly lower than that which is actually required.

3.6 The alternative OAHN prepared by Barton Willmore on behalf of a Consortium of developers suggests that the actual OAHN is circa 140,000 dwellings. Newland Homes support this position including the Methodology used which sets out a more rational assessment of need. Should the Panel not agree and the Plan is not progressed against this revised figure, Newland Homes would strongly advise that to ensure the robustness of the housing numbers to be delivered, the JSP should at least follow the DCLG standardised Methodology for calculating OAHN. Using this approach would result in a revised figure of 116,500 dwellings. Therefore, on the basis of the evidence put forward, it is considered that the Housing Requirement for the West of England JSP should stand somewhere between 116,500 and 140,000.

3.7 We would also highlight that the housing requirement figure set through the Barton Wilmore Report would be even higher if the JSP were specifically looking to address the deep-set affordability issues in the WoE region.

3.8 If taken forward this significant under-estimation could have major consequences on the success of the JSP and the region's Growth Agenda; including the potential to lead to an ongoing undersupply of housing; constrained economic and population growth; continued under delivery of Affordable Housing and in turn actually worsening housing affordability. An increase in the overall housing requirement set in the JSP will obviously have an effect on the housing requirement to be planned for in the SGLP.

**Allowing Sufficient Flexibility:**

3.9 The JSP allows for 3,300 additional dwellings to provide flexibility in the overall strategic approach. This is however only 3% of the baseline need figure of 97,800 dwellings and Newland Homes would therefore suggest this fails to allow sufficient flexibility in delivery. It is important at this point to highlight the existing deliverability issues experienced by the JSP Authorities to date, including their poor performance in meeting current targets and illustrating a 5 year land supply. With issues such as this in mind, Newland Homes would suggest a more appropriate buffer should be considered.

3.10 The South Gloucestershire Core Strategy was adopted in 2013 and set a housing requirement of 28,355 from 2006 - 2027, annualised to 1,350 dwellings (28,355/21 year Plan Period). 5,810 dwellings were completed between 2006 - 2013. This has left the Council with the need to provide up to 22,545 dwellings between 2013 and 2027, equating to an annualised target of 1,610. South Gloucestershire has under-delivered against their annualised requirement of 1,610 dwellings in three of the four years since the Core Strategy's adoption in 2013.

3.11 As it stands, South Gloucestershire has not been able to demonstrate a five-year supply of deliverable housing against their Core Strategy targets for a number of years. The Table/Graph overleaf taken from the JSP's Supporting Housing Topic Paper and South Gloucestershire's adopted Core Strategy highlights this and the need for an appropriate buffer to ensure the Plan is effective and doesn't result in under delivery. In 2016/17 South Gloucestershire's projected peak year, they were expecting to deliver around 2,733 dwellings. Whilst it was a peak year in terms of housing numbers across the Plan Period they only actually delivered 1,630 (40% less).

3.12 Over the Plan Period between 2006/07 and 2016/17 actual and expected housing completions were projected to be 13,524 whereas the actual delivery was 10,866 around 20% less.

*Diagram 1 - WoE Housing Delivery 2006 to 2017*

Please see the attached Document for the Diagram referenced above.

Actual and Expected Housing Completions 2006 - 2027

*Figure 1: Housing Delivery Compared with Projections 2006/07 Onwards: JSP Topic Paper 1 Formulation of the Housing Requirement (2017) and South Gloucestershire Adopted Core Strategy (2013) respectively.*

Please see the attached Document for the information referenced above.

3.13 With issues such as this in mind, Newland Homes would suggest a more appropriate buffer should be considered and this will require further sites to be allocated in the SGLP (beyond the 1,500 dwellings proposed) to ensure sufficient flexibility is provided to meet the actual need within the Plan Period.

**The Proposed Spatial Strategy:**

3.14 The Strategy for new development in South Gloucestershire detailed in the SGLP is made up of 4 elements:

| | |
|---|---|
| | o 22,300 dwellings from the build out of the development planned for in the South Gloucestershire Core Strategy;<br><br>o 2,900 dwellings from maximising the use of Brownfield land within the urban areas;<br><br>o 6,000 dwellings from five new SDLs (+500 dwellings) at Yate, Charfield, Thornbury and Coalpit Heath and the proposed Buckover Garden Village. The JSP also proposes a 1,000 dwelling contingency at land South of Chipping Sodbury which will only be released if it is demonstrated that housing provision is not being delivered at the levels being planned for;<br><br>o 1,300 dwellings from non-strategic sites in the rural areas (10 - 499 dwellings). The JSP also proposes a 500 dwelling contingency from non-strategic sites which will only be released if it is demonstrated that housing provision is not being delivered at the levels being planned for and where there would be no reasonable prospect of planned delivery being met otherwise.<br><br>3.15 The 22,300 to be delivered from the build out of planned developments in the Core Strategy includes the large new neighbourhoods at Patchway/Cribbs Causeway, Harry Stoke, Emersons Green, North Yate and Thornbury. However, when discussing non-strategic sites, the SGLP at Paragraph 2.29 states:<br><br>*"Historically Local Plans in South Gloucestershire have focussed on larger sites in a limited range of places, for example growth in Yate, Thornbury and at Filton Airfield. This has contributed to a reliance on relatively large sites, in a small number of places to meet the District's need for deliverable homes, and directs the benefits of growth to a limited number of places."*<br><br>3.16 As stated previously in these Representations, South Gloucestershire Council have a history of failing to meet housing targets and have not been able to demonstrate a five year supply of housing land for a number of years. Newland Homes would therefore suggest the SGLP Strategy is overly reliant on 6,000 dwellings being delivered at the SDLs, when this Strategy and existing committed development has led to persistent under-delivery in the past. We believe a more appropriate balance should be struck that increases delivery in from non-strategic sites in sustainable locations.<br><br>3.17 At present, it is felt that the Strategy relies too heavily on large scale sites and should instead be looking to deliver more than 1,300 dwellings (1,800 if including 500 dwelling contingency) on non-strategic sites. Non-strategic sites tend to have shorter lead-in times and are less reliant on major infrastructure improvements or increased service provision and so could help the Council ensure that they are meeting housing targets from the very beginning of the Plan Period.<br><br>3.18 The Council's Strategy relies on 2,900 dwellings being delivered on Brownfield land. Brownfield sites are generally less deliverable than Greenfield sites due to complications such as availability, existing use values and abnormal costs such as contamination. It is felt that the SGLP should not be so reliant on Brownfield land to achieve the housing targets set by the JSP as there could be a risk of not meeting said targets, especially in the short term.<br><br>3.19 Newland Homes are supportive of the identification of Thornbury as a settlement suitable for substantial development. Specifically, Policy 7.11 of the Emerging JSP identifies land around the town's North and Eastern edge off Butt Lane and Morton Way as an SDL. However Thornbury Town Centre and the majority of services and facilities are focused in the South-East of the town. It is felt that sites located within very close proximity to employment centres and services/facilities should be utilised for the delivery of new homes. The land being promoted by Newland Homes, West of Bristol Road, Thornbury, is located in close proximity to Thornbury High Street and benefits from being a relatively unconstrained Greenfield location that is surrounded by development. |
| **Attached documents** | SGC_NLP_Feb 2018_Consultation Doc Representations_A5097P_Land West of Bristol Road Thornbury_Newland Homes.pdf (1.4 MB) |

| | |
|---|---|
| **Respondent Name** | Barratt Homes (Bristol) |
| **Comment ID** | 20287457/2180 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | PART 2 - Strategic Development Locations (PP. 50 - 53)<br><br>Dear Sir/Madam,<br><br>**South Gloucestershire Local Plan 2018 - 2036 – 'Regulation 18' Consultation Document**<br><br>**Warner's Court/Land North of Wotton Road, Charfield, GL12 8TG**<br><br>Pegasus Group has been instructed by Barratt Homes (Bristol) to submit Representations to the current Consultation on the Local Plan Consultation Document (February 2018).<br><br>Land North of Wotton Road, is currently the subject of a Planning Appeal against the Council's decision to Refuse Permission for up to 121 dwellings, retail unit, public open space and ecological mitigation (Ref: 16/6924/O) with the Inquiry due to be heard in June/July 2018. The purpose of this Representation is to provide our Comments on the Local Plan Consultation Document in respect of that site and the wider proposals for Charfield.<br><br>PART 2 - Strategic Development Locations (PP. 50 - 53):<br><br>We have previously made Representations in respect of the Emerging West of England Joint Spatial Plan (JSP) expressing our support for the identification of Charfield as a proposed Strategic Development Location (SDL) for up to 1,200 new homes. The updated Sustainable Access Profile (February 2018) continues to demonstrate the good access to services in Charfield, thereby supporting the sustainability of the settlement.<br><br>At Paragraghs 2.41 and 2.46 it is set out that the Council intends to continue discussions with landowners, developers and other Stakeholders, and |

| | |
|---|---|
| | to work with these parties in engaging with the local community as they bring forward sites. We welcome the opportunity to work with the Council and the local community, and request to be kept fully informed of all relevant events.<br><br>Although Paragragh 2.43 expresses concerns about the interdependencies in respect of delivery of the SDLs, it is noted at Paragraph 2.44 that:<br><br>*"Each SDL also has different landowner and developer relationships. The Council would normally seek a comprehensive delivery approach, supported by adoption of a Supplementary Planning Document setting out further detailed requirements. However, this may not be necessary where only a single or small number of landowners control a site. In this context, issues can be resolved via a Planning Application process, and/ or there may be an opportunity to release part(s) of the SDL earlier than the rest to bring forward some delivery."*<br><br>We support the approach to bring forward early delivery through the Application process to deliver new housing more quickly. We maintain that the proposals for up to 121 dwellings (etc) can be brought forward in advance of the adoption of the Local Plan as supported by a package of Planning obligations and CIL payments. There are no infrastructure constraints to prevent delivery now.<br><br>It is proposed at Paragraph 2.40 that each SDL has a Policy which includes (inter alia) a Framework Design, sets the Affordable Housing requirement, provides design guidance, refines infrastructure requirements and low Carbon objectives, and sets out "key dependencies and phasing issues." We are therefore supportive of this, provided the suggested phasing does not seek to artificially constrain early delivery. In particular, we consider that the figure of 1,200 homes for Charfield should not be applied as a maximum given that there may be scope for further development on the sites identified. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | CEG and The Charfield Landowners Consortium |
| **Comment ID** | 16664993/2216 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Dear Sir/Madam,<br><br>**South Gloucestershire Local Plan 2018 - 2036 Consultation**<br><br>**Representations On Behalf of CEG and The Charfield Landowners Consortium**<br><br>Lichfields is instructed by CEG and The Charfield Landowners Consortium (our Client) to submit Representations to the South Gloucestershire Local Plan 2018 - 2036 Consultation.<br><br>CEG and The Charfield Landowners Consortium control a significant area of land to the South of Charfield (referred to as 'the site'), which is shown on the Plan attached at Appendix 1. The site extends to 70 hectares (ha) and represents a major opportunity to deliver sustainable growth, which will significantly assist in meeting the very pressing need for housing in the West of England. It will also assist in the delivery of a wide range of social, economic, and environmental benefits including a site for a new Primary School as well as employment opportunities, Biodiversity enhancement and community facilities.<br><br>These Representations follow our previous Representations to the South Gloucestershire New Local Plan Prospectus Consultation (February 2017) and our Representations to the Regulation 19 Draft of the Joint Spatial Plan (JSP) and should be read in context of these previous Submissions.<br><br>**Key Issues and Objectives: Local Economy:**<br><br>Our Client supports the Council's intentions to address the challenging and ambitious Growth Agenda for the local economy, as reflected by the JSP Strategy. It should be noted that the detailed objectives and Strategies within the Local Plan must be based on a sound Evidence Base to ensure that any planned development, and the mix of uses envisaged, is appropriate to its context, flexible to respond to changing market conditions and deliverable within the Plan Period.<br><br>The Evidence Base for the current Consultation does not include any additional economic or employment evidence. We note that the JSP and its Supporting Documents have indicated that the Council will 'test' delivery of 5 ha of employment land at the Charfield SDL as an initial scenario, but this has not been done yet. We are unclear, therefore, how the Policy proposal is as yet justified. Our Client would welcome further discussions with the Council to ensure that any Policy expectations are appropriate to local market conditions.<br><br>**Key Issues and Objectives: Travel Accessibility:**<br><br>The Consultation Document highlights travel accessibility as a key issue and objective for the Plan, expressing the intention to provide a programme of significant improvements to walking, cycling, Public Transport, road and rail services, aligned to new development.<br><br>Such works are expected to reflect the measures set out in the Joint Transport Study (JTS), which itself will inform the Joint Transport Plan (JTP). Our Client is supportive of the package of measures which have been set out in the JTS, which logically align development with major transport infrastructure improvements. As a more detailed tier of Development Strategy and Management Policy, the New Local Plan must provide greater clarity and certainty on the funding and timescales for delivering these improvements, so as not to undermine the delivery of the Development Strategy.<br><br>For Charfield, this particularly means achieving clarity about the delivery of J14 improvements, when this will take place and how this is to align with the delivery of the SDL – our work shows there is current capacity, although urge the Council to work actively with its Stakeholders and delivery partners to provide clarity.<br><br>Development at the SDL can support substantial bus improvements – and will also bolster the business case for reopening a railway station at Charfield – a substantially positive, although not fundamental, infrastructure improvement for the village. |

**New Local Plan Strategy for Development:**

Our Client supports the proposed Development Strategy and the Spatial distribution of growth, reflecting our Comments to the JSP. We consider that the proposed approach achieves a balanced distribution of growth in relation to South Gloucestershire, which responds to the need to identify a range of sustainable locations to meet housing and economic growth requirements1. The Strategy ensures that opportunities for growth and infrastructure investment are provided across the District and in locations which provide the greatest potential to unlock economic growth and improve sustainable connectivity.

In particular, it is appropriate that the Strategy recognises and takes advantage of the opportunities for sustainable growth at the North of the District. This avoids over-concentrating growth in locations at the Bristol Fringes which already have significant commitments and could risk delay and stagnation in housing delivery.

Furthermore, although it is acknowledged that strategic growth at Charfield is part of a suite of Development Strategies (including a review of Green Belt boundaries); the requirements of national Policy must also be acknowledged and addressed. The draft revised National Planning Policy Framework (NPPF) is noted to place an added requirement for Local Authorities to 'examine fully all other reasonable options for meeting its identified need for development' (Para. 136, Draft revised NPPF). It is therefore consistent with emerging Government Policy that the Council has recognised the considerable opportunity for achieving a sustainable pattern of growth and development in the North of the District, particularly around Charfield, ahead of making amendments to the Green Belt.

The New Local Plan should clarify that the four streams of strategic growth (Core Strategy Developments; Urban Living Strategy; Strategic Development Locations; and Non-Strategic Development) need to be delivered concurrently. There is a significant housing need in South Gloucestershire and the West of England, a point underscored by the most recent monitoring statement which indicates that the Council has only a 4.66 year supply of housing land. Growth across all four streams will avoid back-loading the housing trajectory.

**Strategic Development Locations:**

Our Client expresses its full support for the identification of Charfield as a SDL for residential-led development. As expressed previously in our Representations, strategic development at Charfield is consistent with the Vision and Strategic Priorities of the JSP, which seeks to align new development with transport infrastructure investment.

Charfield is a sustainable location for expansion and unlike numerous other settlements in the JSP area it is not constrained by Green Belt. The proposed development would offer considerable benefits that would enhance its sustainability, including the potential to reopen the former railway station and provision of new community and commercial facilities.

Strategic development of the scale proposed is also consistent with national Policy, which directs significant development to locations which are, or can be made, sustainable (Para. 17, NPPF and Para. 104, Draft revised NPPF). An SDL at Charfield will ensure that a critical mass of development can support the infrastructure and uses required to enhance and consolidate the settlement's existing sustainability credentials. This, in turn, will also help to foster wider sustainability through improved links across the North of South Gloucestershire, to the Thornbury and Buckover SDLs, and towards settlements in the Stroud Vale, such as Wotton-Under-Edge, Cam, Dursley and Kingswood.

Our Client notes that Paragraph 2.33 of the Consultation Document states that 'the JSP process is not complete and final decisions have not been made about where the [SDLs] will be.' Whilst this is made in the context of the previous Consultation exercises, it should be noted that the JSP Strategy has been approved by Full Council and submitted for Examination. We would urge the Council to be clear and more consistent in its message to communities and Stakeholders, and to acknowledge that the New Local Plan is not intended to review the location or principle of any of the identified SDLs.

**Masterplanning Process:**

We note the Council's Comments in Paragraph 2.44, stating that although the Council would normally seek a comprehensive delivery approach supported by a Supplementary Planning Document, this may not be necessary where only a single or small number of landowners control a site. This is certainly the case in relation to our Client's interests, which accounts for the majority landholding at Charfield. Our Client's site will clearly be required to deliver a majority of the development within the SDL.

Our Client's Team is engaged in ongoing work to develop a credible and deliverable scheme in Consultation with South Gloucestershire Council and other Stakeholders which will make a significant contribution towards meeting the objectives of the SDL. This work is currently being progressed, and our Client is engaging with the community and key local and statutory Stakeholders. We are also working together with developers promoting other sites in the village, such as Bloor, to ensure a co-ordinated approach. On the basis of this work, our Client's site will be brought forward through the Development Management process with a comprehensive Masterplan and Parameter Plans. It will therefore be possible to achieve a consistent and comprehensive approach to development through the Development Management process. A Supplementary Planning Document would only add unnecessary delay to the planning and delivery of this key strategic site.

Our Client notes the Council's intention to work with landowners, developers and other Stakeholders as they draft Policy in respect of matters outlined in Paragraph 2.40. We welcome the opportunity to continue supporting the Council, noting the extensive design and technical work which is being undertaken by the Client's Project Team to inform the emerging masterplan at Charfield.

All Policy and infrastructure requirements which are to be proposed at the SDLs will need to be supported by a robust Evidence Base to ensure that they are viable, feasible and deliverable. In relation to the Charfield SDL and in advance of any detailed Allocation Policy being drafted, our Client has the following Comments:

**1 Infrastructure Requirements:**

Our Client acknowledges that the allocation of a significant quantum of development at Charfield has the potential to provide funding to contribute towards a package of infrastructure improvements to support new development and make the village a more sustainable location for development.

Our Client supports the requirement for contributions towards the delivery of transport infrastructure, which should be proportionate to that required to make the development sustainable and acceptable. It is also essential that the Councils provide clear detail about the scope and delivery mechanisms for projects associated with the Strategic Transport Package, so as to ensure that it is not an impediment to development. In particular

| | |
|---|---|
| | we note that there is no evidence to suggest that our Client's site cannot proceed in advance of the M5 Junction 14 improvements, and the re-opening of the railway station is also not considered to be a prerequisite to development of the SDL.<br><br>**2 Low Carbon and Renewable Objectives:**<br><br>Proposals for a 100% reduction in C02 emissions from new development (i.e. Zero Carbon) are very ambitious and the feasibility of achieving this will be significantly affected by site context and constraints. Any Policy on sustainable design and construction at Charfield should be sensitive to the rural context of the site and should contain flexibility to ensure that such a requirement does not undermine viability or the suitability of the design to this rural settlement.<br><br>We have noted wider Comments on the Council's emerging approach to sustainable construction and design in our Comments below.<br><br>**3 Key Dependencies and Phasing Issues:**<br><br>The Consultation Document indicates that the Council will be giving consideration to dependencies and phasing issues in preparing detailed Policy for each SDL allocation. At Charfield, our Client is keen to stress that although a long term strategic site, there is potential for development to be brought forward in the short-term. Our Client's Project Team has undertaken initial work which shows there is local infrastructure capacity to support initial phases of development.<br><br>Facilitating housing development in the short term will assist in meeting the Council's shortfall in land supply, as well as avoiding a back-loaded housing trajectory. The Council should therefore work with developers to pragmatically facilitate development coming forward in the short-to-medium term at Charfield, and not place onerous phasing limitations or restrictions, particularly in relation to infrastructure (recognising particularly that earlier phases of development could support the funding or provision of infrastructure requirements).<br><br>**4 Wider Employment Opportunities:**<br><br>The Document references that the SDLs will provide employment opportunities, though this is not elaborated upon. Our Client would welcome further detail on the Council's proposed approach, noting our Comments in the JSP which have stressed that any employment allocations should be informed by further evidence based on local market needs. This will also need to be sensitive to market conditions and acknowledge the potential for non-B Class Uses to provide employment opportunities. |
| **Attached documents** | CEG and The Charfield Landowners Consortium - Lichfields (Tristan Dewhurst).pdf (6.4 MB) |

| | |
|---|---|
| **Respondent Name** | John Phillips - Phillips Planning and Development |
| **Comment ID** | 318177/2226 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **South Gloucestershire Local Plan Consultation/Call for Sites February 2018 (5th February - 30th April 2018)**<br><br>This submission statement comprises two sections. The first of which makes a number of general Comments about the need and ability of the New Local Plan (SGLP) to provide sufficient housing and employment opportunities within South Gloucestershire in the period 2018 - 2036 in line with the requirements already stated within the Joint Spatial Plan (JSP) and Joint Transport Study (JTS) on the basis of the four Growth Strategies set out in the Draft SGLP.<br><br>The second part of this statement is submitted in response to the Call for Sites exercise which is being undertaken in tandem with the new Local Plan to assess the potential for new sites to be considered for both housing and/or employment opportunities.<br><br>We have made previous detailed Submissions to the various Core Strategy opportunities and indeed previous Call for Sites exercises undertaken in 2014 and 2016. We consider this to be the most important opportunity for the Council to assess new sites and reappraise those sites previously submitted which have a realistic and genuine opportunity to come forward within the Plan Period. Indeed, it is our intention in Part 2 of this statement to update the information last submitted in 2016 due to significant recent improvements in services and utility infrastructure upgrades which we believe further significantly enhances the potential of our Client's land at Westerleigh Road, Westerleigh, to be considered as a genuine and sustainable opportunity for new housing within the new Plan Period and which could realistically come forward for development within the first 5 years of the Plan Period.<br><br>Part 1 - General Comments/Context:<br><br>We note in the preamble of the SGLP (Page 3), the Council acknowledges, "There has never been greater pressures on our urban and rural areas to accommodate additional housing and economic growth."<br><br>The housing requirement for South Gloucestershire as indeed for the four Unitary Authorities is dictated by the figures contained in the over-arching JSP whereby South Gloucestershire is required to provide 32,500 houses as its part of the 105,500 new houses covering the whole of the Unitary Authority Area comprising South Gloucestershire; Bath and North East Somerset; Bristol; and North Somerset.<br><br>We note the SGLP sets out four scenarios in which this level of housing could potentially be achieved. These include: |

| | |
|---|---|
| | 1. Continue with the strategic growth sites identified in the Core Strategy including Emersons Green and Patchway together with progressing other strategic allocations through the Planning process at Harry Stoke, North Yate and Cribbs/Filton Airfield. Cumulatively these developments as identified in the JSP could deliver 22,300 new homes as well as new employment and supporting infrastructure.<br><br>2. The SGLP identifies additional growth under the JSP requirements that the existing urban centres will deliver a minimum of 2,900 dwellings.<br><br>3. There is an identified shortfall of 7,300 homes which is intended to be met by large scale developments at Yate, Charfield, Thornbury, and Coalpit Heath as well as a new Garden Village at Buckover (as identified in the JSP). These combined sources are intended to provide 6,000 new homes and employment opportunities. There is also a proposed contingency (identified in the JSP) of 1,000 new homes South of Chipping Sodbury, if required and subject to ongoing 5 yearly reviews of the new Local Plan.<br><br>4. The final element will be provided by non-strategic development within the rural areas both within and outside the current Green Belt for approximately 1,300 new homes with an additional contingency of 500 (identified in the JSP) through an ongoing 5 yearly review of the new Local Plan.<br><br>This final fourth element is something which we have been consistently arguing for throughout the earlier Core Strategy opportunities given the uncertainties of a number of the larger strategic sites to come forward within the relevant Plan Periods given the likely huge infrastructure costs involved and that a number of the strategic options will require Central Government funding to enable their realisation. Indeed, many of the strategic proposals will need major new road infrastructure finance which will not be provided in sufficient amounts by developer contributions or indeed CIL payments alone. We therefore fully support the Council's apparent new stance following identification in the JSP that a number of rural sites will need to come forward to ensure a genuine ongoing 5-year housing land supply position as required by Central Government.<br><br>Many such settlements and villages have been crying out for such opportunities for many years, where local services and shops have barely survived (and indeed many have gone to the wall) given the need for new housing on the edge of villages to sustain both the local population and services. This is particularly apparent where such development opportunities are appropriate given their relative juxtaposition close to major urban settlements and whereby their release would have little if any obvious impact upon the Green Belt in their particular localities.<br><br>We note that the new Local Plan is objectively looking at 35 rural settlements across the District to establish which would be the most appropriate for some level of limited development. We fully support this approach, but there will no doubt be certain settlements which by their location are clearly remote from larger centres and in sustainability terms offer no obvious solution or justification to the proposed provision of new housing within the rural areas. We do not wish to make Comment upon the Council's choice of settlement assessment (as this is something South Gloucestershire will need to determine), but it is fairly evident from the Plan provided that a number of "options" have very little, if any, genuine credentials for new housing development and therefore in our opinion the choice should be restricted to those genuinely available sites close to the major urban centres with the ability to provide sufficient meaningful level of development without the need for significant and costly upgrades to the existing utility services available including electricity, water, and sewerage facilities and result in major net out commuting.<br><br>We now wish to resubmit consideration of our Client's land in the Call for Sites exercise as part of the new Local Plan process and feel wholly justified in so doing on the basis of updated major new infrastructure provision/upgrades which are now readily available adjoining the site and which also serve the recently upgraded utility provision of the whole village as set out in Part Two of this statement. In addition, we are aware of further future upgrades in the pipeline having recently contacted a number of utility providers. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ashfield Land |
| **Comment ID** | 16658689/2270 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | 3.0 **KEY ISSUES THAT APPLY TO THE NEW LOCAL PLAN PREPARATION:**<br><br>**Housing Numbers:**<br><br>3.1 The NLP sets out that 32,500 homes are required to be delivered in the South Gloucestershire Authority Area over the Plan Period 2018 – 2036. These figures have been based on the emerging housing requirements that are set out in the Submission Draft of the JSP which seek to provide a total of 105,500 dwellings across the West of England area.<br><br>3.2 The approach to delivering this housing supply is set out in four components: completion of the developments planned for in the Core Strategy; a new approach to urban living by maximising the use of Brownfield land within urban areas; five Strategic Development Locations (SDLs); and non-strategic development – which is defined as smaller-scale development in more rural areas.<br><br>3.3 Each element of the proposed housing supply is then divided into the following proportions:<br><br>*Table 1. Components of Housing Delivery set out in the South Gloucestershire Local Plan*<br><br>Please see the attached Document for Table 1 which is referenced above.<br><br>3.4 The JSP has been subject to considerable objection (including Representations made by us), much of which focuses on the inappropriate level of housing the Emerging Documents plan for. We will not repeat these objections in great detail given that SGC will be in receipt of them in respect to the JSP process; however, for clarity, the concerns that have been raised can be summarised as follows: |

• Market signals in the form of house price ratios and the locations where demand is highest are being ignored;

• Weaknesses in the population projections and Household Formation Rates (HFRs) underpinning the MHCLG household projections have led to an error in the JSP's starting point for OAHN;

• Analysis of labour supply and demand has identified that there is likely to be a shortfall in the number of workers from the demographic-led assessment of need to take up jobs in the West of England;

• The demographically-led assessment is again pessimistic in respect to demand from the labour market meaning that the OAHN does not address jobs-led growth satisfactorily. Accordingly, the OAHN should instead provide for additional labour supply to support the Oxford Economics Medium/High Growth scenario;

• In-migration rates have been under assessed;

• The level of housing provision and economic growth projections are not aligned with the JSP seemingly planning for 30% less growth than historic trends suggest is likely; and

• Sufficient uplifts need to be applied to respond to market signals such as overcrowding, concealed households and worsening affordability. Such an approach would be consistent with the recommendations of both the Barker Review (2004), and the more recently published Redfern Review (November 2016).

3.5 These concerns and the Evidence Base that supports the JSP will be subject to considerable debate as part of the forthcoming Examination in Public (EiP) and we consider that the Local Plan cannot progress with any certainty that the currently identified figure of 32,500 dwellings will be the final adopted requirement, in light of the above factors and the market signals that should be taken into account. On consideration of these signals it is our opinion that the overall housing figure will only increase and we will describe the rationale behind this later in this statement.

3.6 While we do not consider that the Council should simply delay progress on the new Plan until the JSP has been examined and is close to adoption, it should include provisions to react to the potential that housing requirements will be increased and the Emerging Document and its Evidence Base needs to be flexible and responsive.

3.7 Given that the 'Urban Living' Strategy is already adopted to maximise existing commitments and Brownfield redevelopment opportunities to an unrealistic level in our view (see Sections 4.54 – 4.63), we consider that any large proportion of uplift in housing numbers will need to be accommodated as part of Non-strategic Development Locations (NSDLs)or new JSP Strategic Development Locations (SDLs).

3.8 Therefore, the Emerging Plan should remain flexible at the current time until the overall numbers have been ratified; when undertaking assessments for new potential locations for NSDLs, SGC should not confine their assessment to simply seeking sites that will meet the current non-strategic growth apportionment of 1,300 dwellings set out in the JSP (plus the potential uplift of 500 dwellings which is the contingency already identified). SGC must assess sites in a more open manner and establish a hierarchy based on each site's characteristics, to allow additional land to be incorporated into the Plan as an allocation, if housing requirements dictate that further sites are required to meet the Objectively Assessed Need.

3.9 Such an approach will also be helpful in allowing the Council to amend the Plan when it is reviewed on a 5-yearly basis, as required by the proposed changes to the NPPF. Even if consideration of the uplifts associated with the standardised Methodology can be delayed, the very latest the Plan must grapple with this issue will be at the point of the five-year review. We advocate that the market signals that the standardised Methodology emphasises should not be ignored; otherwise the failure to meet housing requirements that are required in Table 1 of this statement will simply continue with significant adverse effects on housing availability and affordability.

**The Shortfall:**

3.0 The new Local Plan intends to deliver the JSP target of 32,500 dwellings. However, we have only found limited references to additional work being undertaken to amend the SHMA household projections (March 2018 SHMA) which states the following on Page 81:

*'We have identified that the baseline household projections should be increased by 1,660 households to take account of concealed families and homeless households that would otherwise not be captured due to suppressed household formation rates.'*

3.1 However, there has been no further adjustment considered in light of the chronic shortfall in the delivery of housing since 2006 in SGC and we consider that the new Local Plan needs to respond to this shortfall to reduce issues of worsening affordability in the Authority Area.

3.2 Planning Practice Guidance states the following in the context of providing advice on how a housing requirement be derived, having initially been based on household projections:

*'The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing. The assessment will therefore need to reflect the consequences of past under delivery of housing. As household projections do not reflect unmet housing need, Local Planning Authorities should take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply.'*

[Paragraph: 015 Reference ID: 2a-015-20140306]

3.3 Since the beginning of the Core Strategy period, the following housing delivery has occurred:

*Table 2. Housing completions against annualised housing target (SGC 2017 AMR)*

Please see the attached Document for Table 2 which is referenced above.

3.4 It is clear that there has been a chronic under delivery of housing in the South Gloucestershire area since the beginning of the Core Strategy Plan Period. This cannot simply be ignored given the above advice set out in NPPG which clearly states that where supply has been constrained, the Objectively Assessed Need should be amended accordingly to reflect this. A small adjustment of 1,660 dwellings across the entirety of the West of England Plan area as proposed in the Emerging JSP is not sufficient when SGC alone has a chronic shortfall of over 4,000 dwellings which should have been delivered in the last Plan Period. The new Local Plan should therefore seek to rectify the issue via one of two methods outlined below; or provide clear evidence to show that either this has been included within the Housing Requirements already, or justification provided as to why this shortfall can be ignored.

3.5 The Authority could deal with this shortfall within the next five years. This would require the following five-year supply and annual targets to be met (i.e. by adopting the Sedgefield approach), against the JSP requirements from 2016.

*Table 3. Five year housing land supply requirement dealing with shortfall from previous Plan Period*

Please see the attached Document for Table 3 which is referenced above.

3.6 However, we note that each of the West of England Authorities are intending to use their current annual requirement until the JSP is adopted (see Paragraph 5.7 of Topic Paper 2 (The Spatial Strategy)) for five year housing land supply calculations and we consider that this is inappropriate and may lead to insufficient Permissions being granted or sites not being delivered. We suggest that five year housing land supply is calculated based on the Housing Requirement set out in the JSP now to avoid any backlog or shortfall occurring in this Plan Period and to ensure LPAs are aspirational in delivering housing.

3.7 We can appreciate that the level of delivery set out in Table 3 above would be unprecedented for SGC, and as such, we would request that the Authority in the very least acknowledge that this shortfall from the previous Plan Period cannot be ignored and is included as an adjustment rate to the overall housing requirement for the new Local Plan.

3.8 As an alternative, justification needs to be given as to how only 1,660 dwellings have been included as part of the adjustment rate for concealed families and homeless households across the entire West of England Plan area, when there is a clear deficit in delivery in SGC of over 4,000 dwellings alone since 2006.

3.9 In light of this, it is our opinion that the NLP housing requirement does not fully account for previous under-supply and therefore is unsound in its current preparation.

**Market Signals/Standardised Housing Methodology:**

3.10 The 'Home Truths 2016/17: South West' Report prepared by the National Housing Federation identified that: 'We aren't building enough homes in the region. There are 21,000 new households forming each year, but less than 19,000 homes were built in 2015.'

3.11 As reflected in the most up to date House Price Index information, the average price for a home in the South West is estimated to be £250,816 (February 2018) according to the latest HPI published by the Government (April 2018). This has increased by 4.89% since February 2017 (£239,143), 11% above the national average of £225,407.

3.12 In respect to the constituent Authorities that make up the South West, the Home Truths Report identified that the localised issue is even more acute. In South Gloucestershire, the average house price is £252,491 (a 9.8% increase over the previous year's average), yet the average salary by comparison is just £26,827. As such there is an average house price to average income ratio of 9.4; a significant increase from the ratio of 8.7 identified in the 2015/16 Home Truths Report and above the average ratio of 9.1 across England.

3.13 These are strong market signals that suggest that significant boosts to housing supply are needed in the area to address worsening affordability.

3.14 As we have set out in the preceding section of this statement, it is acknowledged that there are transitional arrangements in place that will relate to the introduction of MHCLG's standardised Methodology. However, simply ignoring this emerging change in Policy approach and the data that underpins it, as the Emerging JSP currently does, is not rational because although these new requirements are yet to come into force, market signals are a material consideration when preparing Development Plans with Paragraph 17(3) of the NPPF stating:

*'Plans should take account of market signals, such as land prices and housing affordability, and set out a clear Strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.'*

3.15 The new MHCLG Methodology is wholly based on responding to market signals by providing adjustments to household growth projections based on a ratio between median earnings and average house prices. Therefore, the emerging figures, although they have not formally come into force, provide a clear and consistent market signals adjustment figure. This is a significant material consideration that should have, and needs to be, taken into account when deciding the appropriate housing requirement that the NLP should adopt.

3.16 Accordingly, the Emerging Local Plan needs to take account of the new MHCLG Methodology when formulating and agreeing the correct housing requirements for an area. Simply ignoring the emerging MHCLG figures on the basis that the Methodology behind them is yet to be adopted clearly doesn't adhere to this requirement.

3.17 Alongside the Consultation Paper published at the end of last year MHCLG also published a Table comparing existing planned requirements against those arising from applying the new Methodology. These revised requirements are summarised in the Table below:

*Table 4: Standardised Methodology Requirements applied to the WECA constituent Authorities*

Please see the attached Document for Table 4 which is referenced above.

3.18 As can be seen from above, overall the application of the standardised Methodology results in a housing requirement uplift of 10.4% across the WECA. In respect to South Gloucestershire, the uplift represents a 9% increase from the currently adopted Core Strategy requirement and the headline figure shown in Table 4 suggests that the 32,500 dwellings that the NLP proposes to accommodate is reasonable and will meet SGC's needs. However, the required uplift that will apply to Bristol needs further consideration.

3.19 Bristol City will in future be expected to uplift their own housing requirement by 14,900 dwellings as set out in the standardised Housing Methodology when this is adopted. Given that Bristol City is already expected to find 12,000 dwellings as part of the Urban Living Strategy set out in the JSP, with a very limited number of dwellings being proposed as part of new allocations, this underlines the paucity of development options available which is understandable given that its Administrative Area is almost completely landlocked by urban areas in SGC, North Somerset and BANES.

3.20 It is therefore highly likely that the proposed uplift of 14,900 that will apply to Bristol City will not be able to be delivered within its own boundaries exclusively. The Duty to Co-operate will require that neighbouring Authorities such as SGC attempt to accommodate the residual housing need. It has already been established as part of the JSP process that BANES are reluctant to accommodate large scale growth on the edge of Bath itself because of its UNESCO World Heritage Site status, thus it is likely to mean that NSC and SGC have to accommodate the larger proportion of this need within their boundaries. For SGC we anticipate this could result in an uplift to housing numbers as high as circa 7,000 dwellings.

3.21 In conclusion, it is our opinion that in order for the Plan to be found sound the Local Plan must seek to respond to these market signals by providing additional housing supply, above the target of 32,500 dwellings currently being planned for and provide a flexible mechanism by which the NLP can respond to potential uplifts required to deal with unmet need arising in Bristol.

3.22 This issue will need further analysis by SGC in conjunction with neighbouring Authorities, but we estimate that such an uplift will need to be somewhere in the order of 4 - 5,000 dwellings to adequately address market signals and adhere to the Duty to Co-operate in terms of accepting development needs that cannot be provided at the point of demand, within the City of Bristol itself.

9.0 **CONCLUSION:**

9.1 We have set out a range of concerns regarding the level of housing growth that the NLP plans for. In connection to this we note that the JSP will set the housing requirements that the NLP must plan to accommodate but we have highlighted the need for the NLP to retain flexibility to react to changing housing requirements which will become relevant at the five-year review stage at the very latest. These requirements are likely to involve significant uplifts to the level of housing that will need to be delivered in SGC to address the issue of unmet need arising from Bristol.

9.2 The Spatial Strategy for the NLP seeks to deliver sufficient housing and infrastructure requirements over the next 18 years. In doing so, it has prioritised the intensification of urban land by increasing densities and encouraging the development of Brownfield land, followed by considering the most sustainable locations for growth including Greenfield and some Green Belt land.

9.3 We consider that allocating a range of sites including a large proportion of sites in accessible locations within the Green Belt is the most appropriate way of ensuring the best chance of delivering housing in South Gloucestershire, particularly to ensure that the Council has the best chance of demonstrating a five-year housing land supply and ensuring Affordable Housing is delivered at Policy compliant levels. An unrealistic reliance on urban intensification, with viability and land assembly issues to be addressed, will lead to the Strategy failing to deliver.

9.4 We have identified a number of concerns in respect to some of the potential locations for non-strategic development that are being considered by SGC; these unsustainable locations should be discounted now and removed from further assessment. Hanham however has a range of key everyday facilities, access to Transport Corridors and employment areas and therefore is a suitable location for non-strategic scale development.

9.5 We therefore ask that the Council address the following issues in the next draft of the NLP:

• Revisit Housing Numbers to ensure that the past shortfall and market signals are properly accommodated;

• Make sure that a hierarchical approach to site assessments are undertaken, including a ranking system, to ensure that sites can be added into the Plan if the JSP or later reviews of the Plan indicate additional land is required;

• Reduce the reliance on the Urban Living source of housing supply so the yields associated with this are more realistic;

• Place greater focus on the need to engender sustainable transport use and active modes to increase health and wellbeing, which will include a more fundamental review of Green Belt locations that are closely related to the existing urban areas, including the primary source of demand for housing: Bristol;

• Discount further assessment of the unsustainable locations that are currently being considered to accommodate non-strategic growth;

• Make it clear that highly sustainable locations such as Hanham should incorporate larger proportions of housing growth and larger allocation sites; and

• Allocate land at Castle Farm Road for circa 180 dwellings.

Please see the attached Document for additional Comments relating to this particular Question.

| | |
|---|---|
| **Attached documents** | Ashfield Land - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (30.0 MB) |

| | |
|---|---|
| **Respondent Name** | Amanda Scott |
| **Comment ID** | 20374561/2288 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **(a) Engagement with Local Councils:**<br><br>Before the next stage of producing the new Local Plan South Gloucestershire should tap into local knowledge in Iron Acton about the significance locally of particular sites and areas, their sustainability, land ownership, historic or ecological value etc. This should be a genuine reaching-out to local people rather than simply general "drop-in" events. This would be consistent with the spirit of the South Gloucestershire Statement of Community Involvement and alert the Authority to issues of particular local sensitivity or concern.<br><br>**(b) M4 Junction 18A:**<br><br>The decision in March 2018 by South Gloucestershire Cabinet Members to recommend the Lyde Green option for the new Junction 18A on the M4 following the public Consultation in 2017 means that Highways England is now in a position to make a firm recommendation to the Department for Transport on its location. The new Junction should include a link to Yate. It would change significantly the relative sustainability of different locations in the Yate/Chipping Sodbury area. This should be taken into account in the new Local Plan and in the Joint Spatial Plan. Failure to do so will undermine both Plans and render them unsound.<br><br>**(c) General Approach Proposed for the Local Plan:**<br><br>I agree that the starting point should be the completion of existing, agreed Core Strategy developments in South Gloucestershire, and that priority should be given to urban renewal and maximising the use of Brownfield land in Yate/Chipping Sodbury in order to minimise the loss of Greenfield land. This would include proceeding with the North Yate New Neighbourhood which would provide up to 3,000 new homes for Yate.<br><br>Although it is 12 years since the North Yate New Neighbourhood was agreed nothing has been built. This means that there is no justification for the further proposal for 2,000 homes in the neighbouring North West Yate location. North West Yate should not proceed in the absence of clear evidence that there is a demand for another 4,000 homes in the Yate, Chipping Sodbury and Coalpit Heath area. Over-supply of development sites will simply encourage developers to cherry-pick the easiest ones resulting in a piecemeal approach rather than the "master-planning" South Gloucestershire says it wants.<br><br>I also object strongly to siting the proposed North West Yate development in the Iron Acton Green Belt without demonstrating the "exceptional circumstances" required by National Guidance. No justification is given in the Draft Joint Spatial Plan and it appears that no justification will be given in the new Local Plan. So how will the national requirements be demonstrated? South Gloucestershire should rethink. If it has to identify sites for major new development additional to North Yate they should be in areas close to the new M4 Junction 18A, rather than in Iron Acton (which is separated from it by a railway line, the River Frome and unspoilt Green Belt).<br><br>**(d) Design of New Development:**<br><br>I welcome South Gloucestershire's commitment to a "master-planning" approach to strategic developments "in Consultation with local and community interests" and to |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Amanda Scott |
| **Comment ID** | 20374561/2289 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | SDL - Yate<br><br>**Urban Localities – Yate:**<br><br>I welcome the proposed "whole town" approach to future planning for Yate but do not support the inclusion of the proposed North West Yate Strategic Development Location in this. In the absence of credible evidence that the Yate/Chipping Sodbury/Coalpit Heath area needs the proposed 50% increase in housing stock (over 20 years, meaning an unprecedented 2.5% average annual population increase), and in the absence of credible evidence that building in the Green Belt is justified and the most sustainable option, the North West Yate proposal should not proceed.<br><br>I support the suggested "Western Gateway" around Yate Railway Station and the aim of more intensive and mixed use of the employment areas within the Parish (in particular the Industrial Estates East of the Yate/Armstrong Road Roundabout). As part of this steps should be taken to reduce the impact of heavy goods traffic on homes on the B4058 Wotton/Bristol Road and the B4059 Yate/Latteridge Road, principally by supporting proposals for the new M4 Junction 18A and encouraging Heavy Goods Vehicles to use that route. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | H2 Development Management (Land at Williams Close, Longwell Green) |
| **Comment ID** | 20376737/2299 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Please see the attached Document. |
| **Attached documents** | H2 Development Management - Tetlow King Planning (Sean Lewis).pdf (5.3 MB) |

| | |
|---|---|
| **Respondent Name** | Ellen Kenny - Siston Parish Council |
| **Comment ID** | 7853761/2337 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | **PAGE 54 Non-Strategic Development in the rest of South Gloucestershire:**<br><br>**The adopted Joint Spatial Plan (JSP) setting out Policies covering the Unitary Authorities in the former Avon area identified strategic housing sites across the whole area through to 2036, but to the great delight of many did not include predicted major sites in the Parish of Siston. This new Local Plan is designed to ensure Plan led development rather than speculative opportunism through to the same 2036. It is required to provide a further 1,300 new homes and potential small scale employment areas within South Gloucestershire as well as a contingency from non-strategic sites of an additional 500 new homes, to be released if other housing provision is not being delivered at levels planned for.**<br><br>**Two potential sites within Siston have been identified for further investigation, both feature in Option 3 of Rural Places (Both Inside and Outside the Green Belt). These are among the 35 selected to contribute to the 1,300 homes required, with both deemed to be in sustainable locations, to provide from 10 to a maximum of 500 homes on each. Described as being in rural areas adjacent to the urban edge, in a Green Belt setting as well as outside or on the edge of designated Settlement Boundaries.**<br><br>**No specific Maps or site details are as yet available to view but that described as No. 4 at Bridgeyate and No. 31 at Warmley are shown as a number on the Map on the North side of the A420, along London Road beyond Winfield Road as far as Bridgeyate – both sites within the Green Belt.**<br><br>**Submitted by Cllr John Hunt in advance of the meeting of Siston Parish Council on Thursday 15th March 2018 providing relevant background information and recommendations for the consideration of those present on that occasion.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Redrow Homes South West, Julia Wallington, Debra Turner, Andrew Williams, Chr... |
| **Comment ID** | 20167105/2339 |
| **Document Part Name** | Question 19 Other Comments |
| **Comment** | Please see attached Representations Document. |
| **Attached documents** | Redrow Homes South West and Others - Grass Roots Planning (Mr. Matthew Kendrick).pdf (7.2 MB) |

| | |
|---|---|
| **Respondent Name** | Chris Dadds - JLL |
| **Comment ID** | 16621569/724 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG212 |
| **Attached documents** | SG212 Land North of London Road, Wick.pdf (5.3 MB) |

| | |
|---|---|
| **Respondent Name** | Chris Dadds - JLL |
| **Comment ID** | 16621569/779 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG41 |
| **Attached documents** | SG41 Land at Rear of Mount Pleasant Farm, Longwell Green.pdf (1.7 MB) |

| | |
|---|---|
| **Respondent Name** | Alan Harris |
| **Comment ID** | 19731969/806 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG417 |
| **Attached documents** | SG417 Land on the West Side of Severndale, Severn Road, Hallen.pdf (1.3 MB) |

| | |
|---|---|
| **Respondent Name** | Kevin Hunt - JLL |
| **Comment ID** | 2880865/916 |
| **Document Part Name** | Question 20 - Call for Sites |

| | |
|---|---|
| **Comment** | SG284 |
| **Attached documents** | SG284 Land at Cleve RFC, Cosham Street, Mangotsfield.pdf (1.4 MB) |

| | |
|---|---|
| **Respondent Name** | Gill Pirie |
| **Comment ID** | 19840321/920 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG32<br><br>I write to raise my objections specifically to Call for Sites, Reference SG32 (previous Reference: PSP105) concerning the Pre-planning Application for Land off Castle Farm Road, Hanham.<br><br>Along with many local people in Hanham, I have enjoyed this Green Belt area for over  years, which is used by dog walkers, horse riders, joggers, rambling groups, bird watchers and many families enjoying fresh air in a natural environment.  I have also witnessed hot air balloons on the skyline (picture attached) with an emergency landing by one during this time.<br><br>Recent cultivation of crops for the 5 months from May - September has not in any way detracted the site's natural habitat, nor has it stopped locals from enjoying the surrounding country footpaths.  Pictures (attached) taken from  today show a very lush green area that quickly revives after each harvest and certainly doesn't deter our local wildlife or birdlife.  Evidence of this (also attached) a picture taken last November 2017 when I caught one deer (of two) on camera just the other side of Water Lane.  Many birds are in evidence throughout the year including Green, Great and Lesser Spotted Woodpeckers, Jays, Pheasants and an abundance of British garden birds such as Goldfinch, Swifts, Swallows and House-martins during Summer months.  Last November 2017 my neighbours and I  in  found evidence of badgers in our gardens showing they are alive and thriving.<br><br>Housing development on the Green Belt with limited parking space will attract many cars, plus congest local roads.  Despite assertions to the contrary, people will use their cars due to distances involved and absence of Public Transport.  Hanham Surgery currently has nearly  patients making it difficult to get an appointment.  Plans do not appear to include additional facilities and our local Surgery, Schools and Youth Club will be unable to cope.  I fear a spoilt, overcrowded area leading to frustration and anti social behaviour caused by congested roads, lack of facilities and open space.<br><br>Additional housing in South Gloucestershire should firstly focus on 'Brownfield' sites across the County.  Proposed Plans for organised open space within a development is no substitute for loss of Green Belt and eroding natural habitat.  Developers are only interested in their own gains, not the health and welfare of our local community. The current generation are custodians of our environment; we should seek to protect it for future generations to experience and enjoy.  Once lost it is gone forever. |
| **Attached documents** | 280418-2.pdf (2.2 MB)<br>060814.pdf (1.3 MB)<br>280418-3.pdf (2.3 MB)<br>231017.pdf (3.3 MB) |

| | |
|---|---|
| **Respondent Name** | A. K. Pirie |
| **Comment ID** | 19722241/922 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG32<br><br>**Site Reference SG32 (previous Ref: PSP105) - Land off Castle Farm Road, Hanham, BS15:**<br><br>I am dismayed to learn that another Planning proposal has been submitted for the Green Belt Land off Castle Farm Road, Hanham, also known as The Batch, and I write to convey my objections.<br><br>The area provides a great amenity to the community and is regularly used by a large cross section of people including dog walkers, horse riders, ramblers, families, mountain bikers, joggers and others and has done so over many years and should be preserved for future generations. Previous propsals for this ground have been Refused, the reasons are still valid and should be Refused again. This area provides a nutural buffer between current urban development and Hencliffe Wood and is vital to the character of the surroundings and must be retained. It is Green Belt.<br><br>The area has SNCI status which the Pre-planning Application tends to dismiss as no longer relevant because the fields have been used for agriculture for the past 5 years.  This is a complete red herring since - sowing to harvest takes 5 months - ground left fallow for 7 months. So for the greater part of the year the ground is left to nature. Once the crop is harvested the wildlife really comes alive each year. From  in  I have observed all the usual wildlife, birds large and small including pheasants, foxes, squirrels, bats and even deer. (photograph attached). Since the last harvest in 2017 the ground has remained untouched, the grass has refreshed itself, the fields are green, evidence of agriculture has already gone. The land is Green Belt; developer provisioned open space is simply unnecessary.<br><br>Road access to the site is very restricted making it unsuitable for large scale residential development.  There is a narrow pinch point in Castle Farm Road adjacent to the Listed farm buildings the Application purports to protect.  Despite assertions that people will walk and cycle, the reality is that people will use their cars and cause traffic congestion and pollution. With 180+ new houses planned the increased traffic would downgrade the |

| | |
|---|---|
| | rural community feel of this quiet corner of South Gloucester. The whole demand for housing is based on pre-Brexit data which is very dubious to say the least and likely to change anyway.<br><br>No additional infrastructure has been proposed to support this and other proposed developments in the area which will place additional burden on existing services such as Doctors, Schools etc. These facilities are vital to a community and are already close to capacity with waiting times to see a Doctor becoming ever longer.<br><br>In summary, I believe this Application should be Rejected because;<br><br>* It will add pressure to community services which are already fully stretched.<br><br>* Has very poor road access.<br><br>* Encroaches on the Green Belt.<br><br>* Provides no supporting infrastructure.<br><br>* Reduces the open space amenity of the area enjoyed by the local community.<br><br>* Dissmisses the wildlife habitat e.g. Deer.<br><br>* Gives nothing back - developers take profit at the expense of the local community. |
| **Attached documents** | Deer.pdf (5.0 MB) |

| | |
|---|---|
| **Respondent Name** | Neil R. Higgs |
| **Comment ID** | 401345/927 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG82; SG259; SG125; SG50; SG32; SG105; SG283; & SG41<br><br>Dear Planning Policy,<br><br>Please note my formal Response as a resident at :<br><br>Please register my objection to current proposals and Consultations around various undeveloped, Greenfield sites in the Hanham area; particularly supporting any consideration to ensuring the safeguarding and protection of these open spaces.<br><br>In this respect I would nominate specifically SG82 Cricket Ground and SG259 Gover Road and Stone Hill View Green Space as Designated Local Green Spaces;<br><br>and in addition support SG125; SG50; SG32; SG105; SG283; SG41. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | John Wilson-Smith |
| **Comment ID** | 4874241/929 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG103<br><br>Dear Sir,<br><br>I wonder if I may make Comment on a site submitted by Alveston Parish Council in Response to SGC's Call for Sites. |

| | |
|---|---|
| | I would like these observations with regard to 16.5 hectares, Reference Number: SG000109, to be taken into account in your future considerations.<br><br>1) This is within Green Belt.<br><br>2) It is a particularly beautiful valley, used by a great number of walkers each day.<br><br>3) Access from this site onto either, Down Road, Lower Hazel, or Greenhill Road is potentially difficult (a previous Planning Application was turned down on these grounds).<br><br>4) All the drainage from this area would go through a narrow stream to Lower Hazel (a house here was well flooded some years ago).<br><br>5) This site is immediately adjacent to a number of areas of great intrinsic ecological importance.<br><br>6) There are many people who would feel strongly about the development of this site. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | James Myatt |
| **Comment ID** | 19852385/930 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG103<br><br>Call for Sites - Land from Down Road to Green Hill Lane and the area leading up to Lower Hazel Farm. SG00109.<br><br>Dear Sir or Madam,<br><br>I am the owner of .<br><br>I have concerns about any development of this site for residential purposes:<br><br>1. Development would appear to encroach on the Green Belt.<br><br>2. The site is sloping and much is below road level making access to Down Road difficult and dangerous.<br><br>3. It would mean an extension of the edge of Alveston, eating into the natural green divide between Alveston, Old Down and ultimately, Lower Hazel.<br><br>4. Keeping the fields as fields preserves the rural nature of the area and avoids urban "merge." The individual communities therefore retain their own characters.<br><br>5. Lower Hazel contains a number of Listed Buildings. Development will put the historic appeal of the area at risk.<br><br>6. There are historical sites close by which may be put at risk by any development.<br><br>7. The additional volume of traffic which development of the site would generate would add to congestion and there is a doubt that this is suitable for not only Down Road, but the use of other country lanes (such as Hazel Lane) as cut-throughs.<br><br>8. Lower Hazel and the streams which run through it acts a natural conduit for rainwater. This natural drainage system has already been adversely affected by the light Industrial Estate at Rudgeway. Building on the land will inevitably damage this drainage and lead to flooding in the valley.<br><br>9. There will be additional light pollution in a rural area. |

| | |
|---|---|
| | I hope this is of assistance. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Robert E. Eales |
| **Comment ID** | 19883265/931 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG82; SG259; SG125; SG502; SG105; SG283; & SG41<br><br>Dear Planning Policy,<br><br>Please note my formal Response as a resident at .<br><br>Please register my objection to current proposals and Consultations around various undeveloped Greenfield sites in the Hanham area, particularly supporting any consideration to ensuring the safeguarding and protection of these open spaces.<br><br>In this respect I would nominate specifically SG82 Hanham Cricket Ground and SG259 Gover Road and Stone Hill View as Designated Green Spaces, and in addition support SG125, SG502, SG105, SG283, and SG41. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Claire Dolman - Hanham Abbots Parish Council |
| **Comment ID** | 1060929/935 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG259; SG41; SG283; SG105; SG32; SG82<br><br>Regarding the areas subject to 'Call for Sites' Submissions, the area noted as SG259 Land at Hanham Hall was submitted as a site for consideration as an extension to the existing Green Belt many years ago by the Parish Council. The Parish Council's view is that the need for protection of this green space is more important now than ever, bearing in mind there is a Call for Sites for development on most of the Hanham Hills. Since the original Submission, there has been extensive development on the Hanham Hall Hospital site, the Land at the Corner of Whittucks Road and Abbots Road (John Chiddy Close) and Stonehill View. In view of this, the site is more valued as a green space than ever, providing a buffer from urban sprawl between Hanham and Longwell Green.<br><br>SG41 Land Rear of Mount Pleasant Farm, SG283 Land at Williams Close, SG105 Land to North of Abbots Road/Court Farm Road. All of these sites are currently within the Green Belt and indeed SG105 is situated in the Hanham Abbots Conservation Area. The Parish Council strongly opposes the development of these areas, known as the Hanham Hills, as it would necessitate the provision of considerable supporting infrastructure to such a degree that it would totally destroy the character of these green spaces that provide an invaluable buffer between the urban settlements of Hanham and Longwell Green.<br><br>SG32 Land at Castle Farm Road. The Parish Council strongly opposes the development of this site as not only is it within the Green Belt; it forms part of the Avon Valley Conservation Area and is a Site of Nature Conservation Interest (SNCI).<br><br>See Appendix 3 to the Plan '....*Green Belt adjacent to the urban edges of Bristol and surrounding rural settlements close to the urban edge, has a particularly important role in preventing sprawl of the urban edge and merger.'*<br><br>Regarding SG82 Abbots Road Cricket Club, HAPC has made strong Representations for this site to be included as a designated Local Green Space and would welcome this space being reconsidered as such.<br><br>It is understood that once the Consultation is completed, proposed sites will be assessed by the HELAA process and it will be interesting to know whether any of the Responses from this Consultation will also be used to inform the viability of these sites for development. We would welcome the opportunity to Comment again, once this 'boiling down' process has identified potentially viable sites.<br><br>In essence, Hanham Abbots Parish Council is not against development, but supports carefully planned development of Brownfield sites to ensure that developers deliver Affordable Homes. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Faye M. Schneider |
| **Comment ID** | 19883457/957 |
| **Document Part Name** | Question 20 - Call for Sites |

| | |
|---|---|
| **Comment** | SG82 & SG259<br><br>Dear Sirs,<br><br>I write to express my support of the reviews and Reports submitted by the Hanham District Green Belt Conservation Society and the Keep Hanham Abbots Special Group. In particular, I nominate SG82 and SG259 as Designated Local Green Spaces.<br><br>The green land around Hanham is very important to my family and the local community. In fact, it was one of the reasons that we purchased a house in  where we would  our  . I want  to be able to enjoy and explore the flora and fauna in those spaces. To build on them would be a travesty; especially when there are other more suitable sites available (Kleeneze). |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Simon Fitton - Alder King Planning Consultants |
| **Comment ID** | 10757761/965 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG134 |
| **Attached documents** | SG134 Land to the South of Hardy Lane and West of Lower Tockington Road, Tockington.pdf (1.7 MB) |

| | |
|---|---|
| **Respondent Name** | Angela Smedley - Fisher German LLP |
| **Comment ID** | 19732673/983 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG332 |
| **Attached documents** | SG332 Land at Hortham Lane, Hortham, Almondsbury.pdf (2.8 MB) |

| | |
|---|---|
| **Respondent Name** | Hanham District Green Belt Conservation Society, Friends of Hanham Abbots Con... |
| **Comment ID** | 20009697/988 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG82 & SG105<br><br>Town and Country Planning Act 1990.<br><br>South Gloucestershire Council Local Plan Call For Sites<br><br>Objection to the inclusion of sites SG82 - Land at Hanham Playing Fields Sports Ground, Abbots Road, Hanham and SG105 - Land to the North of Abbots Road, Hanham, promoted by Colliers International.<br><br>Good morning,<br><br>I write on behalf of Hanham District Green Belt Conservation Society, Friends of Hanham Abbots Conservation Area & Keep Hanham Abbots Special.<br><br>I have been instructed to lodge the attached Submission as an objection to the inclusion of the above-mentioned sites in the latest Housing and Employment Land Availability Assessment (HELAA), as part of the Local Plan Consultation process. |
| **Attached documents** | PHanhamAbbotsObjection_CoveringLetter.pdf (85 KB)<br>180413 Hanham Residential Development Transport Letter - Issue__01.pdf (155 KB)<br>Land at Hanham Abbots Objection Submission Document.pdf (782 KB)<br>Hanham Court, Review of Heritage Assets, Undrafted.pdf (911 KB)<br>818_2361 LVIA for Land at Abbots Road Hanham Updated.pdf (9.8 MB) |

| | |
|---|---|
| **Respondent Name** | Julia & Richard Boissevain |
| **Comment ID** | 19883777/1000 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG105 & SG82<br><br>Dear Sir or Madam, |

Please find our Response to the Local Plan and specifically the inclusion of Hanham Hills as a potential site for development – SG105 and relocation of the Hanham Cricket Club – SG82.

1. **Hanham Abbots Conservation Area:**

The Hanham Abbots Conservation Area was carefully conceived in October 1989. Hanham Court, its Chapel at ease, St. Georges Church, and the Tithe Barn, are all monastic buildings, dating back to the C13th & C14th. Hanham Hills sweep down to Hanham Court, Bickley Farm and on up to Court Farm, on the brow of the hill. The transition to the River Avon, through steep woodland, takes in Hanham Mills with its riverside setting. All of these contrasting elements create a unique and rich setting, which requires conservation.

The original Document publicising the Conservation Area, captures the rural and historical nature of the area. So the Conservation Area presents us with a beautifully preserved Medieval setting.

The 9 small Medieval fields that make up Hanham Hills are separated by ancient hedges and bounded by dry stone walls. The historically significant Pound remains and has been reclaimed by volunteers, as has the monastic fishpond at Hanham Court. Here the Abbots of Keynsham Monastery lived, with their retinues of monks.

The buildings are inextricably linked and connected to one another and to the Hanham Hills above and the River Avon below and without the integrity of the rural character of the Hanham Hills being maintained, Hanham Court, the Tithe Barn and St. Georges Church, will all be greatly diminished.

Ferry Road takes one down to the River Avon through quarried woods to Hanham Mills and the old weir. All these contrasting elements create a setting worth conserving. This is why, when South Gloucestershire Council made the designation, it said:

"Designation is a recognition of the group value of the buildings and their surroundings and the need to protect, not just the individual buildings, but the character of the area as a whole."

**We therefore strongly object to the Hanham Hills being included within the proposed sites for residential development and the relocation of the Hanham Cricket Club and Pitches, on the grounds that it will materially and permanently damage the nature of the Hanham Abbots Conservation Area.**

1. **The Proposed Move of the Cricket Pitches, Tennis Courts, Parking Area and Clubhouse:**

I cannot see the sense in this, unless of course one is benefitting financially from the sale of the land for development. Currently the Hanham community is well served with a Cricket Club centrally located within the village. It is a traditional village setting, which creates much needed green space, close to the urban area of Hanham and to the West of the A4174.

To move it 0.8 miles away will clearly reduce access for the Hanham community it is there to serve. The developer gains, whilst the community has to commute to the facility, which will inevitably lead to more car journeys; the very thing the Council is trying to reduce!

The Tennis Courts are also moving according to the Colliers Plans and they have floodlights for Winter and evening games. How will this be handled within a Conservation Area? The additional lighting from the Clubhouse, residential development and Courts will inevitably change the rural nature of the Hanham Hills forever.

**For all these reasons we strongly object to the move of the Cricket Club from its current location to the Hanham Hills. Its current location serves the community well and certainly better than the proposed new location, being significantly closer and within walking distance where it is.**

1. **Transport Links and Access:**

The Local Plan prioritises bus, trains, cycling and walking over car use. The Colliers Report makes general claims about good access, but in fact the access to all but cycle routes is poor.

Keynsham Train Station is a drive away from Hanham Hills, which would result in more car journeys. Bus stops are a considerable walk away and the walk is precarious because the access roads from Hanham Village past the Elmtree Pub from the West and from the East down Court Farm Road are both single file for traffic.

The road has no pavement and is a danger for pedestrians and cyclists. If the road was widened it would lead to the road being used even more as a rat run and importantly this would completely change the rural nature of the Conservation Area, with the removal of ancient dry stone walls and the inevitable increase in traffic flows.

| | |
|---|---|
| | **Impact on Hanham Court Gardens Watercourse:**<br><br>Hanham Court Gardens are internationally recognised, having been created by Chelsea Gold Medal winners, , over the past years. We are concerned that the monastic fish ponds, which have been fed by watercourses running off the hills for nearly 1000 years, might be affected by the proposed developments.<br><br>These monastic fish ponds feed the whole of our woodland valley, running down to the River Avon and if reduced, increased or polluted in any way, it would endanger the flora and fauna, which we and before us, have worked so hard to create and preserve at Hanham Court Gardens.<br><br>**Longwell Green Retail Park:**<br><br>I have spent years growing a business with stores throughout the UK and a business. During this period the Retail Sector has changed and continues to change at a phenomenal pace.<br><br>Nothing is certain about the future in Retail, however small Retail Parks, such as the one at Longwell Green, are unlikely to feature in the future of Retail over the next 20 years.<br><br>E-commerce offers a far more compelling mix of competitively priced products, such that only the very best Retail Centres will be attractive enough to draw the time poor consumers of tomorrow.<br><br>Your Local Plan puts too great an emphasis upon the viability of the Retail Park at Longwell Green. In ten years, you may need to fill in the retail's voids at Longwell Green with residential housing. To consider building housing around Longwell Green, on the one asset, which the future generations will increasingly cherish, our green spaces, is folly.<br><br>**I believe Longwell Green Retail Park should be added to the list of sites for housing development. If it is not on the list now, it soon will be.**<br><br>We hope you will take our views into consideration and use your powers to prohibit developments generally within the Green Belt and specifically on the Hanham Hills development, which would, in our opinion, materially change the Conservation Area for the worse. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Emma Greening - Hunter Page Planning |
| **Comment ID** | 18686593/1034 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG328 |
| **Attached documents** | SG328 Land to the East of Badminton Road and the North of Luckington Road.pdf (980 KB) |

| | |
|---|---|
| **Respondent Name** | Emma Greening - Hunter Page Planning |
| **Comment ID** | 18686593/1035 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG327 |
| **Attached documents** | SG327 Land at Hollybush Farm.pdf (990 KB) |

| | |
|---|---|
| **Respondent Name** | Emma Greening - Hunter Page Planning |
| **Comment ID** | 18686593/1036 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG479 |
| **Attached documents** | SG479 Land at Hollybush Farm 2.pdf (980 KB) |

| | |
|---|---|
| **Respondent Name** | Emma Greening - Hunter Page Planning |
| **Comment ID** | 18686593/1037 |
| **Document Part Name** | Question 20 - Call for Sites |

| | |
|---|---|
| **Comment** | SG348 |
| **Attached documents** | SG348 Land to the North and South of Grange Farm, Tormarton.pdf (867 KB) |

| | |
|---|---|
| **Respondent Name** | Emma Greening - Hunter Page Planning |
| **Comment ID** | 18686593/1038 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG480 |
| **Attached documents** | SG480 Land to the North and South of Grange Farm, Tormarton.pdf (862 KB) |

| | |
|---|---|
| **Respondent Name** | Emma Greening - Hunter Page Planning |
| **Comment ID** | 18686593/1039 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG429 |
| **Attached documents** | SG429 Land at Manor Farm, Tormarton.pdf (855 KB) |

| | |
|---|---|
| **Respondent Name** | Gill Pirie |
| **Comment ID** | 19840321/1050 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG82<br><br>I wish to lodge my objection to the proposed Pre-planning Application for housing development on the current Cricket Club at Abbots Road. There is no logic in moving the Cricket Ground from a perfectly adequate site to one further from the heart of Hanham except to pave the way for high density housing on a prime site. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Simon Fitton - Alder King Planning Consultants |
| **Comment ID** | 10757761/1077 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG380 |
| **Attached documents** | SG380 Land at Bristol Road, Frampton Cotterell.pdf (2.5 MB) |

| | |
|---|---|
| **Respondent Name** | Matthew Kendrick - Grass Roots Planning Ltd |
| **Comment ID** | 4889857/1090 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG33 |
| **Attached documents** | SG33 Land at Church Road, Severn Beach.pdf (2.5 MB) |

| | |
|---|---|
| **Respondent Name** | Matthew Kendrick - Grass Roots Planning Ltd |
| **Comment ID** | 4889857/1115 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG114 |
| **Attached documents** | SG114 Land at Woodlands Golf and Country Club, Trench Lane.pdf (28.1 MB) |

| | |
|---|---|
| **Respondent Name** | Matthew Kendrick - Grass Roots Planning Ltd |
| **Comment ID** | 4889857/1128 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG136 |
| **Attached documents** | SG136 Land at Bank Road, Pilning.pdf (8.7 MB) |

| | |
|---|---|
| **Respondent Name** | Sarah Hamilton-Foyn - Pegasus Group |
| **Comment ID** | 19738017/1167 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG27 |
| **Attached documents** | SG27 Land at Bristol Road, Hambrook.pdf (4.2 MB) |

| | |
|---|---|
| **Respondent Name** | George Yates - Knight Frank |
| **Comment ID** | 19738081/1172 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG436 |
| **Attached documents** | SG436 Land at Filton 20 Business Park, Golf Course Lane.pdf (1.4 MB) |

| | |
|---|---|
| **Respondent Name** | Phill Bamford - Gladman Developments Ltd |
| **Comment ID** | 15612065/1183 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG31 |
| **Attached documents** | SG31 Land South of Horwood Lane, Wickwar.pdf (1.5 MB) |

| | |
|---|---|
| **Respondent Name** | Karen & Sinan Karadag |
| **Comment ID** | 19476929/1189 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG103<br><br>Dear Sir/Madam,<br><br>I am writing in response to the Local Plan Consultation Document, particularly relating to the possible site described as 'Land Adjacent to Primrose Corner, BS35 3QP.' In fact, this is land owned by the current owner of Lower Hazel Farm, Lower Hazel, BS35 3QP and is adjacent to that property.<br><br>We are the owners of the property, of Lower Hazel Farm, and to the indicated potential site.<br><br>There are a number of concerns:<br><br>1. The property at Lower Hazel Farm and its curtilage is a Listed Property and building too close to it will cause it to lose its historic appeal. This also includes Primrose Corner and Olive Barn.<br><br>2. The historical sites of the Quakers Burial Ground and the archaeological site are located in the wooded area, adjacent to the indicated potential site. Any potential development will increase the footfall and could result in damage to these historic sites. The Chapel site at Hartygrove Woods is a conservation site.<br><br>3. If the land is used for residential purposes, the building work will have a negative impact on the horses located within the stable building and paddock, known as Olive Barn Stable. This will also have an impact on the welfare of the alpacas that the owner of Lower Hazel Farm is looking to purchase and has already started to prepare part of the site to house these animals. We are deeply concerned that the owner of Lower Hazel Farm is currently making changes to the land, creating larger access points, to establish that a permanent access is already available, when this is not the case.<br><br>4. There is particular concern as to the impact on drainage in Lower Hazel, which sits in a valley with surrounding agricultural fields. The resultant drainage issues have necessitated the owners of properties in this small Hamlet to manage the drainage by building 'moats' around homes to prevent gardens from flooding. Hazel Lane, in particular, suffers from ongoing drainage issues, even in warmer weather, due to water running off surrounding fields. If the potential building development goes ahead, this is likely to exacerbate the risk of flooding to Lower Hazel.<br><br>5. Potential increase in traffic, and resultant congestion, on the A38, and surrounding Hamlet areas. Many of the roads running through Lower Hazel and Inner Down are 1.5 car widths wide, with passing spaces. The potential access point for the initial development shown on the Map would be on to Old Down Road, creating an excessive increase in noise, traffic and air pollution. |

| | |
|---|---|
| | 6. The land is Green Belt. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mark Chadwick - Hunter Page Planning |
| **Comment ID** | 16617217/1196 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG59 |
| **Attached documents** | SG59 Land to the Rear of Ducie Close, Cromhall.pdf (973 KB) |

| | |
|---|---|
| **Respondent Name** | Mark Chadwick - Hunter Page Planning |
| **Comment ID** | 16617217/1197 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG21 |
| **Attached documents** | SG21 Land at Longcross Farm, Cromhall.pdf (1.1 MB) |

| | |
|---|---|
| **Respondent Name** | Mark Chadwick - Hunter Page Planning |
| **Comment ID** | 16617217/1198 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG57 |
| **Attached documents** | SG57 Land at the Jct of Bristol Road and Knapp Lane, Cromhall.pdf (991 KB) |

| | |
|---|---|
| **Respondent Name** | Tony Clements - Rapleys LLP |
| **Comment ID** | 18764833/1208 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG30 |
| **Attached documents** | SG30 Land South of Gloucester Road, Thornbury.pdf (1.5 MB) |

| | |
|---|---|
| **Respondent Name** | Taya Cotterill - Rapleys LLP |
| **Comment ID** | 19889345/1212 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG602 |
| **Attached documents** | SG602 Land at Plot E10, Northfield Park, Hayes Way, Patchway.pdf (3.1 MB) |

| | |
|---|---|
| **Respondent Name** | Mark Chadwick - Hunter Page Planning |
| **Comment ID** | 16617217/1214 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG601 |
| **Attached documents** | SG601 Land at Brook Farm-M5 Jct 14.pdf (1.2 MB) |

| | |
|---|---|
| **Respondent Name** | Mark Chadwick - Hunter Page Planning |
| **Comment ID** | 16617217/1216 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG19 |
| **Attached documents** | SG19 Land off Charfield Hill.pdf (1003 KB) |

| | |
|---|---|
| **Respondent Name** | Mark Chadwick - Hunter Page Planning |
| **Comment ID** | 16617217/1219 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG58 |
| **Attached documents** | SG58 Land off Chase Lane, Wickwar.pdf (1.2 MB) |

| | |
|---|---|
| **Respondent Name** | Mark Chadwick - Hunter Page Planning |
| **Comment ID** | 16617217/1221 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG60 |
| **Attached documents** | SG60 Land at Woodend Farm, Woodend Lane, Cromhall.pdf (970 KB) |

| | |
|---|---|
| **Respondent Name** | Daniel Millward - Pegasus Group |
| **Comment ID** | 20246977/1242 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG603 |
| **Attached documents** | SG603 Land at Cribbs Causeway.pdf (1.4 MB) |

| | |
|---|---|
| **Respondent Name** | Sarah Butterfield - WYG |
| **Comment ID** | 16619553/1249 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG126 |
| **Attached documents** | SG126 Land South of Park Street, Hawkesbury Upton.pdf (1007 KB) |

| | |
|---|---|
| **Respondent Name** | Richard Edwards |
| **Comment ID** | 19925537/1251 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | Dear Planning Policy,<br><br>Please register my objection to current proposals and Consultations around various undeveloped, Greenfield sites in the Hanham area; particularly supporting any consideration to ensuring the safeguarding and protection of these open spaces.<br><br>In this respect I would nominate specifically SG82 Cricket Ground and SG259 Gover Road and Stone Hill View green space as Designated Local Green Spaces. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Claire Good |
| **Comment ID** | 19925569/1261 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG125; SG50; SG32; SG105; SG283; & SG41<br><br>Hanham Abbots was designated as a Conservation Area on 23 October 1989 and should remain so. We cannot allow Green Belt and Conservation Areas to be swallowed up. We need green spaces for ourselves and for the wildlife. The green areas in Hanham/Longwell Green are slowly being eaten up by development. We have an abundance of wildlife that need to be considered.<br><br>I support the views and Reports submitted by Hanham District Green Belt Conservation Society and the Keep Hanham Abbots Special Group and follow their progress.<br><br>The sites listed below should not go forward for assessment as they do not align with the Vision, Strategy and Policies set out in the Plan or the JSP. |

| | |
|---|---|
| | SG125 Green Belt by Junction of Court Farm Road/Willsbridge Hill.<br><br>SG50 Green Belt, Common Road.<br><br>SG32 Green Belt, Castle Farm Road (Water Lane/Bickley Close/Hencliffe Way).<br><br>Hanham Hills:<br><br>SG105 Green Belt & Conservation Area, Abbots Road/Court Farm Road.<br><br>SG283 Green Belt, Williams Close.<br><br>SG41 Green Belt, Mount Pleasant Farm. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mark Chadwick - Hunter Page Planning |
| **Comment ID** | 16617217/1283 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG115 |
| **Attached documents** | SG115 Land at Buckover.pdf (1.4 MB) |

| | |
|---|---|
| **Respondent Name** | Paul Davis - Persimmon Homes Severn Valley |
| **Comment ID** | 3553569/1285 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG411 |
| **Attached documents** | SG411 Land at The Worthys, Bradley Stoke.pdf (822 KB) |

| | |
|---|---|
| **Respondent Name** | Colin Danks - Peter Brett Associates |
| **Comment ID** | 19740321/1296 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG8 |
| **Attached documents** | SG8 Land Between Emersons Green and Pucklechurch to the North East of Bristol.pdf (1.4 MB) |

| | |
|---|---|
| **Respondent Name** | Andrew Ross - Turley |
| **Comment ID** | 10758529/1313 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG98 |
| **Attached documents** | SG98 Land North of Wotton Road, Charfield.pdf (976 KB) |

| | |
|---|---|
| **Respondent Name** | Conor Lee - Hannick Homes |
| **Comment ID** | 11945985/1320 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG36 |
| **Attached documents** | SG36 Land at Windmill Farm, Sodbury Road, Wickwar.pdf (1.3 MB) |

| | |
|---|---|
| **Respondent Name** | Catherine Norris - Alder King Planning Consultants |
| **Comment ID** | 19740193/1321 |
| **Document Part Name** | Question 20 - Call for Sites |

| | |
|---|---|
| **Comment** | SG76 |
| **Attached documents** | SG76 Land to the Rear of Willow Cottage, Siston Hill, Warmley.pdf (1.2 MB) |

| | |
|---|---|
| **Respondent Name** | Tom Stanley - Knight Frank LLP |
| **Comment ID** | 19926209/1332 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG605 |
| **Attached documents** | SG605 Land at Hanham Community Centre, 124 High Street.pdf (6.3 MB) |

| | |
|---|---|
| **Respondent Name** | Tom Stanley - Knight Frank LLP |
| **Comment ID** | 19926209/1357 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG82 |
| **Attached documents** | SG82 Land at Hanham Sports Ground, 77 Abbots Road.pdf (6.1 MB) |

| | |
|---|---|
| **Respondent Name** | Alex Cave - Origin3 |
| **Comment ID** | 19926401/1364 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG111 |
| **Attached documents** | SG111 Land at Says Court Farm, Badminton Road, Frampton Cotterell.pdf (2.3 MB) |

| | |
|---|---|
| **Respondent Name** | Tom Stanley - Knight Frank LLP |
| **Comment ID** | 19926209/1374 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG105 |
| **Attached documents** | SG105 Land North of Abbots Road, Longwell Green.pdf (6.0 MB) |

| | |
|---|---|
| **Respondent Name** | Ms. J. Hillier and Barratt Homes (Bristol) Ltd |
| **Comment ID** | 19740673/1382 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG107<br><br>See attached. |
| **Attached documents** | Ms. J. Hillier and Barratt Homes (Bristol) Ltd - Barton Willmore (Miss. Robyn Nicholl).pdf (792 KB) |

| | |
|---|---|
| **Respondent Name** | Robyn Nicholl - Barton Willmore |
| **Comment ID** | 16638657/1387 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG280 |
| **Attached documents** | SG280 Land South of the B4055, Easter Compton.pdf (7.4 MB) |

| | |
|---|---|
| **Respondent Name** | Robyn Nicholl - Barton Willmore |
| **Comment ID** | 16638657/1388 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG481 |
| **Attached documents** | SG481 Land to the East of the B4055, Pilning Station.pdf (7.4 MB) |

| | |
|---|---|
| **Respondent Name** | Robyn Nicholl - Barton Willmore |
| **Comment ID** | 16638657/1389 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG100 |
| **Attached documents** | SG100 Land South of Badminton Road, Yate.pdf (6.2 MB) |

| | |
|---|---|
| **Respondent Name** | IM Land |
| **Comment ID** | 16638625/1403 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | See attached. |
| **Attached documents** | IM Land - Barton Willmore (Miss. Robyn Nicholl).pdf (564 KB)<br>2026 Vision Document 06.pdf (2.2 MB) |

| | |
|---|---|
| **Respondent Name** | Daniel Sharp - Walsingham Planning |
| **Comment ID** | 18822017/1412 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG474 |
| **Attached documents** | SG474 Land to Rear of Bath Road, Longwell Green.pdf (35.7 MB) |

| | |
|---|---|
| **Respondent Name** | Mel Clinton - Nash Partnership |
| **Comment ID** | 19927713/1431 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG606 |
| **Attached documents** | SG606 Land at Springfield Lakes, Bath Road-Brewery Hill, Bitton.pdf (1.3 MB) |

| | |
|---|---|
| **Respondent Name** | Jeff Richards - Turley |
| **Comment ID** | 3245505/1462 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG282 |
| **Attached documents** | SG282 Land at Shortwood Lodge Golf Club.pdf (6.6 MB) |

| | |
|---|---|
| **Respondent Name** | Mark Cullen - Alder King Planning Consultants |
| **Comment ID** | 19740865/1483 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG445 |
| **Attached documents** | SG445 Land at Tytherington.pdf (1.3 MB) |

| | |
|---|---|
| **Respondent Name** | Mark Cullen - Alder King Planning Consultants |
| **Comment ID** | 19740865/1487 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG444 |
| **Attached documents** | SG444 Land at Thornbury.pdf (1.2 MB) |

| | |
|---|---|
| **Respondent Name** | Justine de Mink |
| **Comment ID** | 19936033/1489 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG125; SG50; SG32; SG105; SG283; and SG41 |

| | |
|---|---|
| | Specifically, regarding the Call for Sites Map I do NOT believe the sites (listed below) should go forward for assessment as they do not align with the Vision, Strategy and Policies set out in the Plan or the Joint Spatial Plan; that I wish to nominate SG82 the Cricket Ground and SG259 Gover Road and Stone Hill View Green Space as Designated Local Green Spaces.<br><br>List:<br><br>SG125 Green Belt by Junction of Court Farm Road/Willsbridge Hill<br><br>SG50 Green Belt Common Road<br><br>SG32 Green Belt Castle Farm Road (Water Lane/Bickley Close/Hencliffe Way)<br><br>Hanham Hills:<br><br>SG105 Green Belt & Conservation Area Abbots Road/Court Farm Road<br><br>SG283 Green Belt Williams Close<br><br>SG41 Green Belt Mount Pleasant Farm |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Gareth Shehean |
| **Comment ID** | 19936929/1515 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG82; SG259; SG125; SG50; SG32; SG105; SG283; and SG41<br><br>I completely support the views and Reports submitted by Hanham District Green Belt Conservation Society and the Keep Hanham Abbots Special Group. Specifically regarding the Call for Sites Map, I do NOT believe the sites (listed below) should go forward for assessment as they do not align with the Vision, Strategy and Policies set out in the Plan or the Joint Spatial Plan; that you wish to nominate SG82 the Cricket Ground and SG259 Gover Road and Stone Hill View Green Space as Designated Local Green Spaces.<br><br>List:<br><br>SG125 Green Belt by Junction of Court Farm Road/Willsbridge Hill.<br><br>SG50 Green Belt Common Road.<br><br>SG32 Green Belt Castle Farm Road (Water Lane/Bickley Close/Hencliffe Way).<br><br>Hanham Hills:<br><br>SG105 Green Belt & Conservation Area Abbots Road/Court Farm Road.<br><br>SG283 Green Belt Williams Close.<br><br>SG41 Green Belt Mount Pleasant Farm. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Berni O'Mahony |
| **Comment ID** | 10194497/1525 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG125; SG50; SG32; SG105; SG283; and SG41 |

| | |
|---|---|
| | Specifically and in addition to all the points raised in the aforementioned Submissions, regarding the Call for Sites Map I do NOT believe the following sites should go forward for assessment such as via the HELAA as they do not align with the Vision, Strategy and Policies set out in the Plan or the Joint Spatial Plan:<br><br>SG125 Green Belt by Junction of Court Farm Road/Willsbridge Hill.<br><br>SG50 Green Belt Common Road.<br><br>SG32 Green Belt Castle Farm Road (Water Lane/Bickley Close/Hencliffe Way).<br><br>Hanham Hills:<br><br>SG105 Green Belt & Conservation Area Abbots Road/Court Farm Road.<br><br>SG283 Green Belt Williams Close.<br><br>SG41 Green Belt Mount Pleasant Farm.<br><br>The Forms that have been submitted to date also contain gross inaccuracies. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Chris Ashton |
| **Comment ID** | 1400641/1554 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG133 |
| **Attached documents** | SG133 Land Adjoining Elm Tree Cottage, Hardy Lane, Tockington.pdf (761 KB) |

| | |
|---|---|
| **Respondent Name** | Andrew Hicks - Andrew Hicks & Associates Ltd |
| **Comment ID** | 19720097/1555 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG386 |
| **Attached documents** | SG386 Land at Short Hill Road, Westerleigh.pdf (2.6 MB) |

| | |
|---|---|
| **Respondent Name** | Martin Quinton - Hoddell Associates |
| **Comment ID** | 4019073/1566 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG129 |
| **Attached documents** | SG129 Land off Engine Common Lane, Yate.pdf (896 KB) |

| | |
|---|---|
| **Respondent Name** | Martin Quinton - Hoddell Associates |
| **Comment ID** | 4019073/1577 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG228 |
| **Attached documents** | SG228 Land at Wotton Road and New Road, Rangeworthy.pdf (4.5 MB) |

| | |
|---|---|
| **Respondent Name** | Martin Quinton - Hoddell Associates |
| **Comment ID** | 4019073/1578 |
| **Document Part Name** | Question 20 - Call for Sites |

| | |
|---|---|
| **Comment** | SG182 |
| **Attached documents** | SG182 Land at Bristol Road (Site W2), Winterbourne.pdf (871 KB) |

| | |
|---|---|
| **Respondent Name** | Martin Quinton - Hoddell Associates |
| **Comment ID** | 4019073/1579 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG181 |
| **Attached documents** | SG181 Land at Bristol Road (Site W3), Winterbourne.pdf (874 KB) |

| | |
|---|---|
| **Respondent Name** | Martin Quinton - Hoddell Associates |
| **Comment ID** | 4019073/1580 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG183 |
| **Attached documents** | SG183 Land at Bristol Road (Site W1), Winterbourne.pdf (872 KB) |

| | |
|---|---|
| **Respondent Name** | Martin Quinton - Hoddell Associates |
| **Comment ID** | 4019073/1602 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG135 |
| **Attached documents** | SG135 Land at Ableton Lane, Severn Beach.pdf (874 KB) |

| | |
|---|---|
| **Respondent Name** | Hannah Saunders - Dodington Parish Council |
| **Comment ID** | 19931969/1627 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG251<br><br>To Whom it May Concern,<br><br>Thank you for your email regarding this matter.....<br><br>I can confirm that myself and Members looked into this. It was an old Call for Sites as you are aware.... and looking at it I think the reason it was originally nominated was that the Council were thinking of extending the existing Parish Hall. However the extension plans were never intended to be the School building that is highlighted.... they were into the car park of the existing Parish Hall.<br><br>In the future Members may decide to carry out an extension - and it is the car park they would extend into.... so do we need to update this or not.... as I said it is wrongly mapped at the moment. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Andrew Ross - Turley |
| **Comment ID** | 10758529/1663 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG131 |
| **Attached documents** | SG131 Land at Cossham Street, Mangotsfield.pdf (998 KB) |

| | |
|---|---|
| **Respondent Name** | Chris Kembrey - W. C. H. Kembrey & Son Limited |
| **Comment ID** | 12495873/1665 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG609 |

| | |
|---|---|
| **Attached documents** | SG609 Land at Jeffries Hill Bottom, Hanham.pdf (1.6 MB) |

| | |
|---|---|
| **Respondent Name** | Marcus Plaw - CBRE Ltd |
| **Comment ID** | 17918497/1691 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG367 |
| **Attached documents** | SG367 Land at Villa Farm, Main Road, Aust.pdf (1.1 MB) |

| | |
|---|---|
| **Respondent Name** | Chris Skidmore MP |
| **Comment ID** | 5008193/1704 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | **Call for Sites:**<br><br>I recognise that the Call for Sites process provides one source of identifying potential development land to address any identified need for a range of uses, including for community uses such as education and health.<br><br>I welcome the more transparent and easily accessible approach the Council has taken in publicising the sites that have come forward so far in this process. However, the appearance of various sites through the Online Mapping Tool has caused concern in the communities in which they are located.<br><br>I note that the Submission of a site and its display on the Online Map or Call for Sites Register does not mean that the Council in any way supports the development of the site and I would urge the Council to be stronger in communicating this clear message as the Local Plan progresses. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | G. E. Forward |
| **Comment ID** | 20176577/1727 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG32; SG82; SG259; SG41; SG283A; SG283B; and SG105 |
| **Attached documents** | G E. Forward.pdf (2.5 MB) |

| | |
|---|---|
| **Respondent Name** | Bloor Homes |
| **Comment ID** | 17351489/1739 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | **1.0 INTRODUCTION:**<br><br>1.1 These Representations are submitted on behalf of Bloor Homes to the South Gloucestershire Local Plan (SGLP) Consultation Document in respect of Land at Crossways.<br><br>1.2 A Plan of the site to which these Representations relate is enclosed in Appendix 1.<br><br>1.3 The site comprises 3 large fields, divided by hedgerows, in agricultural use, contiguous with the Settlement Boundary for Thornbury.<br><br>1.4 Land at Crossways is approximately 7 hectares and is suitable, available and achievable for the development of about 150 dwellings.<br><br>1.5 The South Gloucestershire Local Plan Consultation Document takes forward the Strategy for the Strategic Development Locations (SDLs)as set out in the Emerging Joint Spatial Strategy (JSP). In respect of Crossways, this includes directing 500 dwellings to the Thornbury SDL overall, but identifying the Crossways site for 5ha of employment development.<br><br>In summary, whilst we wholly support the identification of a Strategic Development Location (SDL) at North and East Thornbury, we object to the setting of a maximum amount of housing and the limited number of homes directed to the town. In addition, we object to the type of development sought on the Crossways site as it is not a suitable location for employment, nor is it viable and hence it is not deliverable.<br><br>**Commercial Land Report for Crossways:**<br><br>4.11 Bloor Homes commissioned JLL to prepare a Commercial Market Report for the site at Crossways and the full Report is found in Appendix 3 of these Representations. Key points from the Report include: |

o Thornbury's provision of industrial/logistical space is focused at Thornbury Industrial Estate which is 12.3 ha in size, with average rental values of circa £6 per sq ft.

o Office space is split between the Town Centre and Thornbury Industrial Estate, with average values of £8 - £12 per sq ft depending on size and condition.

o In Thornbury, market demand for industrial and office space is widely regarded as local businesses and those who are linked to the town or surrounding villages including Wickwar, Wotton-Under-Edge and Charfield. Businesses without a link to the town are more likely to chose North Bristol or Yate for industrial space, and North Bristol (around Almondsbury) for office space.

o Overall there is a low level of activity in Thornbury due to the preference for other more established locations with better road infrastructure, such as Yate. This is reflected in the low rental values achieved in Thornbury, as well as the trends to diversify industrial stock to increase market appetite. Whilst there is demand in Thornbury for employment space, this tends to be due to changes in business needs (growing/shrinking) from existing occupiers in the town and surrounding area.

o Employment space has been lost in the town – of particular note is the redevelopment of the Alexander Workwear site to provide residential units and a Care Home, as well as the conversion of Unit 9 Midland Way Business Park to residential. Lack of activity within the market provides some explanation as to why the space is being converted.

o There is currently 49,500 sq ft of leasehold industrial space available in Thornbury with the majority of units within the space preference for SMEs (i.e. 1,000 – 6,000 sq ft).

o There is currently 12,000 sq ft of leasehold or freehold office space available in Thornbury.

o Apollo Park is a new build speculative industrial development at Yate which completed in Summer 2017. Of the 10 units developed (3,000 – 6,500 sq ft, i.e. the same target market as Thornbury), 40% of units remain vacant 15 Months after completion, in what is a more established location. Any developer/investor considering developing in Thornbury (a smaller Market Town with a slower rate of take up) would have due regard to this when assessing the scheme's viability.

o Viability is a key aspect of considering the appropriateness of a site for a proposed use as if the site is not viable, it is very unlikely to be delivered for the proposed use by the private sector.

o At the current rental levels for Thornbury, it is unlikely that the development of an industrial or office scheme would be viable on the Crossways site, particularly when flood alleviation works will be required along with any potential improvements to transport infrastructure to accommodate the scale of commercial development proposed.

o It is also unlikely that pre-lets would be achieved on the Crossways site as SME occupiers tend to require space for immediate occupation – this has been re-iterated by other Agents who believe due to the secondary nature of Thornbury, potential occupiers would prefer the stock to be built before considering occupation. As a result, any development would be on a speculative basis; however, due to the Covenant strength and short term/flexible nature of the leases preferred by SMEs, the delivery of space for this sector is not compatible with speculative development as there is a risk for any developer that there are significant voids periods, which would erode any return or profit.

4.12 In summary, this Report found that the site is not considered suitable for proposed employment use, particularly logistics and workshops due to:

o Conflict with adjoining residential uses (proposed and existing).

o Limited demand from companies based in Thornbury and the surrounding areas.

o The requirements of SMEs for built out immediate stock as opposed to pre-commitment to development space, coupled with the Covenant strength of these businesses and their preferred flexibility of tenure which would render a speculative development unviable.

o Further to the above, based on the current rental level and anticipated development costs, it is unlikely a scheme would be viable, particularly as flood alleviation works will be needed and highways improvements may be required.

**Viability for Employment:**

4.13 To date, the JSP nor the Local Plan has examined the viability of the proposals for Crossways of 5 ha of employment. This is a fundamental gap in the Evidence Base as the Report has not assessed whether the development of the Crossways site entirely for employment for SME workshops and logistics is viable.

4.14 Para 173 of the NPPF states:

**"Pursuing sustainable development requires careful attention to viability and costs in Plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the Plan should not be subject to such a scale of obligations and Policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for Affordable Housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing landowner and willing developer to enable the development to be deliverable."**

The proposals for 100% employment on the Crossways site will not yield competitive returns to the landowner and developer to enable the

development to be deliverable and therefore these Policy proposals are unsound as they are inconsistent with national Policy and not effective, deliverable or justified.

**Alternative Locations for Employment:**

4.15 Both the EDNA and the Commercial Land Report for Crossways recognise the potential for expansion of the Thornbury Industrial Estate as the most suitable option for the town. In terms of meeting the objectives for the town and diversifying employment opportunities, this would offer the best chance of success as the Industrial Estate is already an established location, with more suitable road access. Whilst the Green Belt is tightly drawn against the Industrial Estate, if there is a need to expand it and this is the best location for it then this would be a legitimate reason to remove land from the Green Belt to accommodate further employment land at the town.

4.16 We also highlight the requirement for a further 11 ha of employment very close to Thornbury at the new Garden Village of Buckover. If Buckover is to succeed as a standalone, sustainable settlement, it will need to deliver a mix of uses including employment. A further 5 ha employment allocation at Thornbury just 1km away is unlikely to be needed and could have the effect of conflicting with the Garden City aspirations and securing a variety of uses at Buckover. Given the scale of development proposed at Buckover (to include 3,000 dwellings), the ability to capture the development value from higher value uses to cover lower value uses and obligations is more likely to secure the delivery of a mixed use scheme, compared with a single use, large employment site for SMEs at Thornbury which is not deliverable. Given the physical proximity between Buckover and Thornbury, and given what is known about demand for employment in Thornbury and its hinterland, it is very unlikely that 16 ha of employment land (i.e. 11 ha at Buckover and 5 ha at Thornbury) will be needed. Thornbury already has an Industrial Estate and employment opportunities elsewhere in the town, including the Town Centre, and any additional employment land in the area should be directed to Buckover to support the development of a new Garden Village here.

**Land at Crossways – Suitable, Available and Achievable for Housing:**

4.17 Land at Crossways has been consistently promoted for housing and the location is residential in nature. The site is relatively unconstrained and well related to the town and has capacity for circa 150 dwellings, deliverable within 5 years. We summarise the latest position with respect to environmental constraints, land ownership and development programme below. A Concept Plan is included in Appendix 4.

**Heritage and Archaeology:**

4.18 Crossways House (Grade II Listed) off Clay Lane lies within 50m of the site to the North East. However, the development of this site would not impinge on the setting of the Listed Building as its setting is separated from the proposed development by a field and significant screening from the tree lined hedgerow that bounds the site. A suitable setback from the Eastern edge of the site will be required, thus further reducing the potential for any impact on the Listed Building.

**Ecology:**

4.19 The site is free of ecological designations. There is scope to retain the majority of hedgerow that bounds and dissects the site.

**Landscape:**

4.20 The site is free of landscape designations and is 10km from the Cotswolds AONB. The development of the site would not give rise to unacceptable impacts on landscape features. Small cottages are scattered along Crossways Lane and Clay Lane which already give an impression of an extended settlement edge in this location. Mature hedgerows, hedgerow trees and garden vegetation also create a well contained character for the proposed development.

4.21 Development of land at Crossways will limit development to the lower slopes of the Severn Ridge which is in keeping with development patterns in Thornbury. This will protect the open character and views experienced along the prominent ridgeline by retaining the larger open fields which create a natural gap between Clay Lane and the A38 to the East.

**Flood Risk Assessment:**

4.22 Based on the Environment Agency's Flood Maps, this shows that most of the site is in Flood Zone 1 where residential development is appropriate. There are also small areas of Flood Zone 2 and 3 adjacent to the two tributaries which traverse the site.

Please see the attached Document for the Extract from the Environment Agency Flood Map which is referenced below.

Extract from the Environment Agency Flood Map.

4.23 However, the flood extents shown on the Mapping extend far from the tributary and run counter to the fall of the land. An initial investigation has been carried out to identify the source of the flooding, which has included a Topographical Survey of the tributaries to inform hydraulic modelling of the watercourses. This modelling has identified that two existing culverts around the Southern side of the site on Morton Way and Hacket Lane, lack capacity to accommodate the existing flows. These culverts are overtopping and causing surface water to shed in a shallow plane across the site before re-entering the tributary North of the site.

4.24 The development proposals will include an interception channel along the Southern edge of the site. This will catch and contain these overland flows before conveying them to a flood alleviation basin, attenuating the water before discharge to the brook. The alleviation basin will be sized to accommodate the volume of overspill from the culverts and provide a betterment to the downstream flood extents on the tributary. In addition to this, surface water discharge from the proposed development will be restricted to the annual average Greenfield runoff from the site, further reducing peak flows in critical events. Surface water from the site will be attenuated in a detention basin on site.

4.25 The Applicant is engaged in a formal Pre-application process with the Environment Agency, which has confirmed support for the principles of the proposed mitigation which will have the effect of increasing the area of the site not affected by flooding.

**Land Ownership:**

| | |
|---|---|
| | 4.26 The land is currently in 2 ownerships. Bloor Homes have option agreements with both landowners to purchase the site, subject to obtaining Planning Permission. There are no Covenants, easements, wayleaves or other legal restrictions on the land.<br><br>**Feasibility:**<br><br>4.27 The site will be subject to a valuation once Planning Permission is granted. Whilst a Site Specific Appraisal has not been undertaken, Bloor Homes is developing land North of Morton Way for 300 dwellings which shares many similarities and has not experienced any viability issues.<br><br>4.28 The proposed development will be compliant with South Gloucestershire Council's Affordable Housing Policy, delivering 35% Affordable Housing.<br><br>**Programme for Delivery:**<br><br>4.29 Overall, it is estimated that it will take 2.5 years to obtain the necessary Consents before development can begin on site in 2020, with development rates expected as follows.<br><br>Please see the attached Document for the missing table of information relating to the above point.<br><br>4.30 We can confirm that the site is available and deliverable for residential in the next 5 years.<br><br>In summary, whilst the broad location of growth at North and East Thornbury is supported, Bloor Homes object to:<br><br>(1) The provision for housing at Thornbury which is not commensurate with the role and function of the town and the approach towards setting a maximum figure for housing at the Thornbury SDL which is inconsistent with national Policy and is unsound.<br><br>(2) The JSP's very detailed site-specific nature of the SDL proposals at Thornbury (i.e. providing very site-specific requirements for particular sites within the Thornbury SDL, rather than strategic requirements across the whole SDL) is also legally incompliant with the South Gloucestershire LDS which states the JSP will contain the broad strategic distribution of housing and employment… including Strategic Locations. It is also inconsistent with the purpose of the JSP which is to identify Strategic Locations for growth (Publication Document Chapter 1, Para 5). This contravenes the strategic role of the Plan where such site-specific details were intended to be added at the subsequent Local Plan stage.<br><br>(3) Notwithstanding Point 2 above, the allocation of employment on the Crossways site is contrary to the evidence in the EDNA which shows that there is plenty of employment land available on other more suitable sites across the District. The proposals for Crossways are not supported by any evidence on specific employment land requirements at Thornbury, and whether there is demand for workshops and logistics space in the town. The proposals for 100% employment on the Crossways site will also not yield competitive returns to the landowner and developer to enable the development to be deliverable. The proposal for employment on the Crossways site is therefore not needed or deliverable, nor effective or justified and is inconsistent with national Policy, and the proposals for Land at Crossways are unsound.<br><br>Land at Crossways is suitable, available and achievable for circa 150 dwellings. The provision for housing at Thornbury is not commensurate with the role and function of the town, where the amount of housing directed to the SDL should be a minimum of 650 dwellings to take account of the residential potential on the Crossways site, and other sites within the SDL. |
| **Attached documents** | Bloor Homes - Barton Willmore (Lauren Taljaard).pdf (1.6 MB) |

| | |
|---|---|
| **Respondent Name** | Eastwood Park Limited |
| **Comment ID** | 16634689/1748 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG63<br><br>Dear Planning Policy,<br><br>I am pleased to submit these Representations on behalf of Eastwood Park Limited to the South Gloucestershire Local Plan 2018 – 2036 Consultation process. These Representations relate to our Client's land interests at Eastwood Park, Falfield and provide a general commentary on the approach taken in the Plan.<br><br>Attached is the formal Representation and this is accompanied by a Site Boundary Plan which shows the extent of the land in question. This site was previously included in a Call for Sites exercise and is directly referenced in this Submission. Please note that a new Call for Sites Form has not been submitted as your Interactive Mapping Software has confirmed that this is not required and the site is already logged.<br><br>Please let me know if you have any questions relating to this Submission.<br><br>Dear Planning Policy Team,<br><br>**South Gloucestershire Local Plan 2018 - 2036 Consultation:** |

| | |
|---|---|
| | I am pleased to submit these Representations on behalf of Eastwood Park Limited to the South Gloucestershire Local Plan 2018 – 2036 Consultation process. These Representations relate to our Client's land interests at Eastwood Park, Falfield (hereinafter referred to as the site).<br><br>This site was previously promoted through the February 2014 Call for Sites (Site Reference: CFS004 SHLAA194) and the Regulation 18 Document, which was Consulted on in November 2015. Both of these Representations were made as part of the South Gloucestershire Council's Policies, Sites and Places Plan Evidence Base. Further Representations were then made to the Suggested Modifications (November 2016) to the Policies, Sites and Places Plan Proposed Submission (June 2016).<br><br>This Consultation concerns a new Document but builds on the matters raised in the previous Consultation processes. A new Call for Sites Form has not been submitted alongside this Representation following confirmation on the 'Online Map of sites' hosted on the South Glos website which confirms that the previous Submission is up to date and will be considered when assessing suitable individual sites. This has the Site Reference SG63.<br><br>For ease, the Question Number included in the Consultation Document has been highlighted. Please note these are all sub questions of Question 3.<br><br>**The Site and Proposals:**<br><br>The land proposed for allocation adjoins Falfield Village to the South. It is roughly triangular in shape and would in-fill the land between Church Avenue and the A38, therefore, providing a logical extension to the existing core of the village.<br><br>The site is bounded to the North by a timber post and rail fence that separates the site to Falfield Learning Centre and to the East by the garden boundaries of Falfield properties. The site, bounded to the South by a notable stand of parkland trees, forms a Northern extremity of the wider Eastwood Park Estate. As such development proposals would need to be responsive to these landscape characteristics, nonetheless, careful design and landscaping would ensure the visual impact on the existing landscape is minimised.<br><br>Attached with this Representation is a Map showing the extent of the land in question. This Boundary Map was previously submitted as part of the Call for Sites process. You will note that the site is shown as two parts – 'a' and 'b'. For the purposes of this Representation the site should be assessed as a whole but delivery options on the site are available.<br><br>In regards to the historic environment, Eastwood Park House, which is a Grade II Listed Building, is located approximately 1 km South of the site. There are no other Listed Buildings or Scheduled Ancient Monuments on or immediately adjacent to the land. The subject site is separated from the Grade II Listed Building by agricultural land, nonetheless, previous investigations have shown that only part of the village of Falfield is currently visible from Eastwood Park House and the proposed development would not greatly increase the visibility of the village from the house. Therefore, the proposed allocation is considered to have no impact on the setting of Eastwood Park House and that the public benefits that would accrue from the development would outweigh any harm.<br><br>The site is Greenfield agricultural land. The agricultural grading of the land has not been confirmed but it is understood not be classed as 'best and most versatile agricultural land (Grades 1, 2 and 3a).'<br><br>The site has the potential to deliver the following number of new dwellings. A density rate of 30 dwellings per hectare (dph) has been used to reflect the surrounding residential context in line with the current adopted Core Strategy CS16; nonetheless, a higher density could be achieved subject to appropriate design.<br><br>o Option 1a - 1.13 ha @ 80% net developable area and 30 dwellings per hectare equates to 27 houses.<br><br>o Option 1b - 2.74 hectares @ 80% net developable and 30 dwellings per hectare amounts to 65 houses. |
| **Attached documents** | Eastwood Park Limited - Jones Lang LaSalle Ltd (Lewis Knight MRTPI).pdf (808 KB) |

| | |
|---|---|
| **Respondent Name** | Oliver Shirley |
| **Comment ID** | 19758945/1763 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG205 and SG206 |
| **Attached documents** | Oliver Shirley.pdf (1.5 MB) |

| | |
|---|---|
| **Respondent Name** | B. Preece - BPA Consultants |
| **Comment ID** | 1448769/1773 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG462 |
| **Attached documents** | SG462 Land at 65 Abbotts Road, Hanham Abbotts.pdf (5.2 MB) |

| | |
|---|---|
| **Respondent Name** | Daniel Drayton - LPC (Trull) |
| **Comment ID** | 19720513/1775 |
| **Document Part Name** | Question 20 - Call for Sites |

| | |
|---|---|
| **Comment** | SG392 |
| **Attached documents** | SG392 Land at Field 1 The Old Rectory, High Street, Iron Acton.pdf (1.5 MB) |

| | |
|---|---|
| **Respondent Name** | Daniel Drayton - LPC (Trull) |
| **Comment ID** | 19720513/1776 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG393 |
| **Attached documents** | SG393 Land at Field 2 The Old Rectory, High Street, Iron Acton.pdf (1.5 MB) |

| | |
|---|---|
| **Respondent Name** | Neil Boyett |
| **Comment ID** | 12499297/1777 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG390 |
| **Attached documents** | SG390 Land Adjacent to 6 Sherbourne Close, Kingswood.pdf (980 KB) |

| | |
|---|---|
| **Respondent Name** | Neil Boyett |
| **Comment ID** | 12499297/1779 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG389 |
| **Attached documents** | SG389 Land at April Cottage, 180 Shortwood Road, Pucklechurch.pdf (1.0 MB) |

| | |
|---|---|
| **Respondent Name** | Neil Boyett |
| **Comment ID** | 12499297/1780 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG475 |
| **Attached documents** | SG475 Land at Shortwood Road, Pucklechurch.pdf (941 KB) |

| | |
|---|---|
| **Respondent Name** | Paul Rogers |
| **Comment ID** | 19719777/1784 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG308 |
| **Attached documents** | SG308 Land at Mounds Court Farm, Webbs Heath Road, Warmley.pdf (554 KB) |

| | |
|---|---|
| **Respondent Name** | Wayne Ayres |
| **Comment ID** | 19719745/1785 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG614 |
| **Attached documents** | SG614 Land at Westerleigh Road, Westerleigh.pdf (1.4 MB) |

| | |
|---|---|
| **Respondent Name** | Mike Harris - Stride Treglown Limited |
| **Comment ID** | 19730689/1788 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG34 |
| **Attached documents** | SG34 Land at Engine Common.pdf (1.4 MB) |

| | |
|---|---|
| **Respondent Name** | Charlotte Taylor - GVA Grimley Limited |
| **Comment ID** | 11482817/1794 |

| | |
|---|---|
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG441 |
| **Attached documents** | SG441 Land at Over Court Farmhouse and Outbuildings (Over Court Barns) and Adjoining Land.pdf (1.2 MB) |

| | |
|---|---|
| **Respondent Name** | Charlotte Taylor - GVA Grimley Limited |
| **Comment ID** | 11482817/1795 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG300 |
| **Attached documents** | SG300 Land at Tall Trees Site, Over Lane, Almondsbury.pdf (1.0 MB) |

| | |
|---|---|
| **Respondent Name** | Edwina Griffith |
| **Comment ID** | 12514497/1796 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG610<br><br>Dear Sir/Madam,<br><br>Further to your email dated 6th March 2018, please find our Responses to your requests as below and note the attached Documents:<br><br>**3. Land with development potential to be considered in the New South Gloucestershire Local Plan**. We wish to **nominate our land for consideration for development** as part of the New South Gloucestershire Local Plan. Having reviewed the Draft HELAA Methodology we assessed that the land passes all of the basic tests set in the High-Level Assessment Criteria and in terms of the Detailed Assessment:<br><br>a. Suitability:<br><br>i. The site has excellent access to services, as Court Farm Road has a bus stop with direct access to Keynsham and the bus stop at the end of the road on Willsbridge Hill has direct access to Bath and Bristol.<br><br>ii. The site is within close proximity of local Schools, shops, employment opportunities and services in Longwell Green and Hanham.<br><br>iii. The site has excellent availability of utilities infrastructure with a mains water supply and access within less than 100 yards for extension of all other facilities from Stratton Place.<br><br>iv. Access is available via Stratton Place and additionally potential access via adjoining or nearby land – see attached illustration of Landowner's close proximity to other Call for Sites Submissions at the bottom of Court Farm Road.<br><br>v. There is minimal impact to the landscape or townscape as Court Farm Road is an established residential community with successful new developments such as Stratton Place.<br><br>vi. The site is flat with no risk of land contamination or floods.<br><br>vii. There are no historic Planning Applications and there is no heritage or ecological impacts.<br><br>b. Availability:<br><br>I. The site has excellent availability for development as it is owned by a willing landowner and can be made available within a short period to be agreed.<br><br>ii. The landowner would support development within any reasonable time frame which could be approached in phases as required.<br><br>c. Achievability: |

| | |
|---|---|
| | i. The site has excellent achievability as utilities infrastructure either already exists or can be easily extended from adjacent residential developments and there are no issues around contamination.<br><br>ii. Supporting Documents see attached Completed Call for Sites Response Form.<br><br>iii. Other Supporting Documents as below have been posted to the Team with a copy of this email due to restrictions on file size when sending.<br><br>Given the extensive number of Documents requested we are also posting this Response to ensure there is no loss of material for consideration by the Council. If you would like any further information, please do not hesitate to contact me via email or using the details in the Forms provided. |
| **Attached documents** | SG610 Land on the South Side of Court Farm Road, Longwell Green and South of Stratton Place, Court Farm Road, Longwell Green.pdf (1.2 MB) |

| | |
|---|---|
| **Respondent Name** | Will Collins - Rackham Planning |
| **Comment ID** | 16416225/1800 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG399 |
| **Attached documents** | SG399 Land at Hambrook Business Park, The Stream, Hambrook.pdf (1.6 MB) |

| | |
|---|---|
| **Respondent Name** | Mark Curtis |
| **Comment ID** | 19719681/1802 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | Land at Poplar Farm, Yate Road, Iron Acton, Bristol, BS37 9XY. |
| **Attached documents** | Mark Curtis.pdf (816 KB) |

| | |
|---|---|
| **Respondent Name** | Spencer O'Leary |
| **Comment ID** | 17785249/1803 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | Land at Paddock of Baytree Cottage, BS37 5JJ |
| **Attached documents** | Spencer O'Leary.pdf (691 KB) |

| | |
|---|---|
| **Respondent Name** | Mark Fitzell |
| **Comment ID** | 19720129/1804 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG467 |
| **Attached documents** | SG467 Land at River View, Land Adjacent to Frome Mill Farm.pdf (1.4 MB) |

| | |
|---|---|
| **Respondent Name** | Miles Morgan |
| **Comment ID** | 3552513/1805 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG384 |
| **Attached documents** | SG384 Land at Frome Mill Farm, Nibley Lane, Nibley.pdf (3.3 MB) |

| | |
|---|---|
| **Respondent Name** | Miles Morgan |
| **Comment ID** | 3552513/1806 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG385 |
| **Attached documents** | SG385 Land at Riverside Farm, Land Near Cog Mill, Bristol Road, Frampton Cotterell.pdf (3.8 MB) |

| | |
|---|---|
| **Respondent Name** | Miles Morgan |
| **Comment ID** | 3552513/1807 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | FAO:<br><br>Dear ,<br><br>I own two parcels of land. One is at.<br><br>1. 13.47 hectares. Frome Mill Farm, Nibley Lane, Nibley, South Glos, BS37 5JG.<br>2. 6.57 hectares. Riverside Farm, Land Near Cog Mill, Bristol Road, Frampton Cotterell.<br><br>I have attached Location Plans of both sites.<br><br>I have been approached by land promoters who appear to be suggesting that both pieces of land have been indicated as of interest in the West of England Joint Spatial Plan.<br><br>We have not been contacted ourselves by South Glos Council but we have gone on the website and we have emailed Site Submission Forms.<br><br>The Plans in the Appendix of the Joint Spatial Plan are very fine scale and the writing is very small. We are not sure if our land has been included/ indicated?<br><br>Our Farm is only just down the road from your Office and I wondered if I could pop in to see somebody to discuss our land with someone with knowledge of the situation.<br><br>For the avoidance of doubt we wish to make our land available for development, subject to the usual Planning requirements.<br><br>I am available any day this week or next week during office hours. Could you please indicate a day and time that I could meet with somebody. Thank you. |
| **Attached documents** | Plan 2 - Frome Mill Farm.pdf (500 KB)<br>Plan 1 - Riverside Farm.pdf (1.5 MB)<br>Plan 1 - Frome Mill Farm.pdf (545 KB) |

| | |
|---|---|
| **Respondent Name** | mervyn ferrante |
| **Comment ID** | 20196065/1808 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | I have some land in Easter Compton which I would like to be considered in the new South Glos Local Plan for 2018 - 2036. Can you please advise on what I have to do to have this considered. Thanks. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | J. Bond |
| **Comment ID** | 17779105/1809 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG477 |
| **Attached documents** | SG477 Land at Stover Bridge, Nibley Gardens, Bridge Road, Iron Acton.pdf (539 KB) |

| | |
|---|---|
| **Respondent Name** | Miles Morgan |
| **Comment ID** | 3552513/1810 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | Dear Sirs,<br><br>With regards to the proposed Strategic Development Locations at North West and West Yate and Chipping Sodbury, in particular I would like to refer to Appendix 1 Concept Diagram for North West Yate. |

| | |
|---|---|
| | Having discussed the issue with my family, we would like to make the following Comments:<br><br>We do own the land to the South of Nibley Lane, up to the river bank of the River Frome. Our land extends from the railway bridge at the Iron Acton end of Nibley Lane to the bridge in Nibley Village.<br><br>We also have Covenants and restrictions on two smaller pieces of land that effectively give us control of whether these smaller parcels can also be developed. They are presently used only for horses.<br><br>All of the above land could be made available for development and we would like you to include it in the proposed area to be developed for the following reasons:<br><br>1. The area is adjacent to the route of the new MetroBus. The Metro Hub and the railway station. It could be directly connected by agreement with ourselves. It would make the land a sustainable location.<br><br>2. The Frome Valley Walkway from the Iron Acton end does not continue across our land. There is no right of way along the river bank on our land. It diverts at my boundary and is routed North on to Nibley lane, a narrow hard surfaced road. It then continues onto Nibley Lane, into the edge of Nibley Village, takes a left turn up Hope Road and then 100 yards up Hope Road goes over a style, down a slope and over the river towards the rear of the Council Offices. We think it would be a good idea to re-route the Right of Way over my lower fields, all along my river bank and then to re-enter Nibley Lane either in the middle of Nibley Village or adjacent to the Hope Road Junction. This would give a segregated continuation of the Frome Valley Walkway. We do understand that Nibley Lane could be pedestrianised but it is quite a way from the river with its wildlife and pleasant amenity.<br><br>3. The Flood Plain hatching is not accurate. This will need to be accurately plotted, it is much smaller than indicated. We do understand Flood Zones and their purpose, but it has only flooded once in living memory and it was very shallow, about 150mm. Please note that the river has been straightened and Civil Engineering works were carried out downstream. We do understand that the lower fields will not be entirely suitable for dwellings but could be an essential part of the overall development in terms of green infrastructure and amenity and provide valuable open space.<br><br>4. Our land does not include historic Parliamentary Enclosures. Our agricultural land is of not very good quality, it is not particularly of outstanding beauty although we appreciate it, we no longer farm it. It is primarily let out in small parcels to domestic occupiers. The electric pylons are not attractive.<br><br>5. We have the main very large foul water sewer running at quite a depth on the lower fields near the river for the entire length of our land eventually ending up in Avonmouth. This may be helpful.<br><br>6. The River Frome could be an effective boundary/stop line. The river could be the new Green Belt boundary.<br><br>7. The land adjacent to the river could become a very effective and pleasant open space, green infrastructure as indicated on the Concept Plan.<br><br>8. Our higher land above the Flood Plain could provide approximately 20 acres of development land as indicated on the Concept Plan. This development would be very pleasant, being adjacent to the river, the river walkway with green sustainable access directly into the rear of the Metro Hub and then onto the railway station, all off road. In fact Iron Acton would be linked by green infrastructure all the way to the railway station via the Frome Valley Walkway.<br><br>9. Ponds, lakes and sustainable drainage could be intergrated into the green infrastructure on our lower fields alongside the river. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | John White - Arena Global Management Ltd |
| **Comment ID** | 19721185/1811 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG395 |
| **Attached documents** | SG395 Land South of The Hollybush Inn, Bath Road, Bridgeyate.pdf (1.1 MB) |

| | |
|---|---|
| **Respondent Name** | Mark Wood - MWA |
| **Comment ID** | 17507041/1812 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG396 |
| **Attached documents** | SG396 Land Between Wotton Road and Church Lane, Rangeworthy.pdf (1.4 MB) |

| | |
|---|---|
| **Respondent Name** | Mike Royall |
| **Comment ID** | 9504353/1813 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | **RE: SG118 Site at 11 Hortham Lane, Almondsbury proposed for Residential, Retail, Leisure.**<br><br>Hi,<br><br>Many thanks for the email regarding your "Call for Sites."<br><br>Please note that my site (11 Hortham Lane) has in fact now got Outline Planning Permission for nine Self Build houses so can you please remove it from your Database.<br><br>Many thanks. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | William Durman RIBA - William Durman Chartered Architect Ltd |
| **Comment ID** | 19721409/1814 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG304 |
| **Attached documents** | SG304 Land at Hill Farm, Westerleigh Hill, Westerleigh.pdf (2.6 MB) |

| | |
|---|---|
| **Respondent Name** | John Gould |
| **Comment ID** | 19721473/1815 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG397<br><br>Hi,<br><br>I called up and they mentioned it was best to email in.<br><br>I just wanted to check that (at this stage) I have given all the information you need for the Call for Sites? (please see email below for original message)<br><br>Also, looking at the Call for Sites Interactive Map I note someone has submitted a Call next to my land.<br><br>Site Reference: SG256 Previous References: PSP094 West of Park Lane, Frampton Cotterell<br><br>Proposed Use: Other (Suggested amendment to Settlement Boundary)<br><br>I was wondering if this has been submitted recently or is it a historic Application?<br><br>I'm not sure if you can tell me who submitted the site but if you could I would be interested in knowing?<br><br>Thanks in advance. |
| **Attached documents** | SG397 Land at 4 Harris Barton, Frampton Cotterell.pdf (6.4 MB) |

| | |
|---|---|
| **Respondent Name** | David Scott |
| **Comment ID** | 19721505/1816 |
| **Document Part Name** | Question 20 - Call for Sites |

| | |
|---|---|
| **Comment** | SG85 |
| **Attached documents** | SG85 Land Adjacent to The Ashlands, London Road, Bridgeyate.pdf (1.2 MB) |

| | |
|---|---|
| **Respondent Name** | Mr. and Mrs. Meredith |
| **Comment ID** | 17796257/1817 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG382 |
| **Attached documents** | SG382 Land at Pool Lodge Farm, Dyers Lane, Iron Acton.pdf (1.1 MB) |

| | |
|---|---|
| **Respondent Name** | Pamela Maggs |
| **Comment ID** | 19719969/1818 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG381 |
| **Attached documents** | SG381 Land at Fieldgrove Lane - Bath Road, Bitton.pdf (5.9 MB) |

| | |
|---|---|
| **Respondent Name** | Chris Stow |
| **Comment ID** | 877825/1819 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG289 |
| **Attached documents** | SG289 Land Adjacent to The Fosse, Crossways Lane, Thornbury.pdf (709 KB) |

| | |
|---|---|
| **Respondent Name** | Liz Stow |
| **Comment ID** | 10195777/1820 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG350 |
| **Attached documents** | SG350 Land Opposite The Fosse, Crossways Lane, Thornbury.pdf (712 KB) |

| | |
|---|---|
| **Respondent Name** | Kenneth Watson |
| **Comment ID** | 14331905/1821 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG383 |
| **Attached documents** | SG383 Land at Dyers Lane, Iron Acton.pdf (1.7 MB) |

| | |
|---|---|
| **Respondent Name** | Phil Small |
| **Comment ID** | 17918113/1822 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG316 |
| **Attached documents** | SG316 Rear of 359 North Road, Yate.pdf (674 KB) |

| | |
|---|---|
| **Respondent Name** | Mr. & Mrs. Bateman |
| **Comment ID** | 19218177/1823 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG387 |
| **Attached documents** | SG387 Land at Shortwood.pdf (1000 KB) |

| | |
|---|---|
| **Respondent Name** | Calum Morris - Greenvolt Development Ltd |
| **Comment ID** | 19721537/1824 |

| | |
|---|---|
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG72 |
| **Attached documents** | SG72 Land at Fishers Farm, Berwick Lane, Hallen.pdf (2.7 MB) |

| | |
|---|---|
| **Respondent Name** | Anthony Ward |
| **Comment ID** | 19720449/1825 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG388 |
| **Attached documents** | SG388 Land at Yate Road, Iron Acton.pdf (1.1 MB) |

| | |
|---|---|
| **Respondent Name** | Suzanne Taylor |
| **Comment ID** | 19721089/1826 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG391 |
| **Attached documents** | SG391 Land Adjacent to Severn View, 80 Gloucester Road, Rudgeway.pdf (1.3 MB) |

| | |
|---|---|
| **Respondent Name** | Richard & Margarita Livall |
| **Comment ID** | 19363649/1827 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG394 |
| **Attached documents** | SG394 Land on the West Side of Ram Hill, Coalpit Heath.pdf (1.0 MB) |

| | |
|---|---|
| **Respondent Name** | Mr. A. J. Ward and Mrs. S. M. Ward |
| **Comment ID** | 14858913/1828 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG172 |
| **Attached documents** | SG172 Land to Rear of 25A London Road, Wick.pdf (732 KB) |

| | |
|---|---|
| **Respondent Name** | G. Watkins |
| **Comment ID** | 5914433/1829 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG320 |
| **Attached documents** | SG320 Land at Abbotts Way (A38), Thornbury.pdf (2.5 MB) |

| | |
|---|---|
| **Respondent Name** | Will Collins - Rackham Planning |
| **Comment ID** | 16416225/1838 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG177 |
| **Attached documents** | SG177 Land off Alveston Hill, Thornbury.pdf (1.8 MB) |

| | |
|---|---|
| **Respondent Name** | Will Collins - Rackham Planning |
| **Comment ID** | 16416225/1862 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG400 |
| **Attached documents** | SG400 Land to the South of Minerva, 15 Gloucester Road, Rudgeway.pdf (1.8 MB) |

| | |
|---|---|
| **Respondent Name** | Will Collins - Rackham Planning |

| | |
|---|---|
| **Comment ID** | 16416225/1868 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG401 |
| **Attached documents** | SG401 Land Between Over Lane and the B4055, Easter Compton.pdf (4.1 MB) |

| | |
|---|---|
| **Respondent Name** | Will Collins - Rackham Planning |
| **Comment ID** | 16416225/1874 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG50 |
| **Attached documents** | SG50 Land Adjacent to 19 Common Road, Hanham.pdf (1.6 MB) |

| | |
|---|---|
| **Respondent Name** | Matthew Blaken - David James & Partners |
| **Comment ID** | 16471649/1880 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG25 |
| **Attached documents** | SG25 Land at South Farm, Wickwar.pdf (2.6 MB) |

| | |
|---|---|
| **Respondent Name** | Roland de Hauke Peeters - Wick Quarry Limited |
| **Comment ID** | 10710433/1881 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG159 |
| **Attached documents** | SG159 Land at Wick Quarry, London Road, Wick.pdf (6.8 MB) |

| | |
|---|---|
| **Respondent Name** | Sharon Robbins - Bitton Parish Council |
| **Comment ID** | 803681/1882 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG249 and SG250<br><br>I refer to your letter .<br><br>Bitton Parish Council has not submitted any proposals under your Call for Sites procedure. The two areas listed are precious green and open spaces which Parish Councillors would wish to remain so. They were previously submitted under the Local Green Spaces proposals. My understanding was that School Playing Fields (such as SG249 Adjacent to Redfield Edge Primary School) are not acceptable as nominations for Local Green Spaces designation but that the area along Siston Brook (of which SG250 is part – we proposed the whole length from Hazelbury Drive, North Common to the Parish Boundary at Cherry Garden Lane/School Road, Oldland Common) was to be designated as a Local Green Space.<br><br>Can you please confirm the position. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Chris Dance - LPC (Trull) Ltd |
| **Comment ID** | 2880545/1889 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG121 |
| **Attached documents** | SG121 Land at Cromhall.pdf (1.1 MB) |

| | |
|---|---|
| **Respondent Name** | A. K. Pirie |
| **Comment ID** | 19722241/1890 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG32 |

| | |
|---|---|
| | Dears Sirs,<br><br>**Objections to Pre Planning Application - Land at Castle Farm Road, Hanham**<br><br>**Call for Sites Feb 2018 - Site Reference: SG32 - Previous Ref: PSP105**<br><br>Further to the new South Gloucestershire Local Plan Consultation Document February 2018, please see overleaf detailing my objections and Comments relating specifically to Call for Sites, Reference SG32 (Previous Reference: PSP105) concerning the Pre-planning Application for Land off Castle Farm Road, Hanham.<br><br>**Objections to Pre Planning Application - Land at Castle Farm Road, Hanham**<br><br>**Call for Sites Feb 2018 - Site Reference: SG32 - Previous Ref: PSP105**<br><br>Places that are pleasant to live in are often characterised by their open spaces, public services, amenities and a green lung with space to breathe. I am therefore dismayed to learn that another Planning proposal has been submitted in respect of the Land off Castle Farm Road, Hanham, also known as The Batch and I write to convey my objections.<br><br>The Batch provides a great amenity to the community and is regularly used by a large cross section of people including dog walkers, horse riders, ramblers, families, mountain bikers, joggers, and others and has done so over a great many years and should be preserved for future generations. Proposals have been submitted in the past and Refused, the reasons are still valid and this latest proposal should also be Refused. Green Belt, of whatever grade, is a diminishing commodity and must be protected. Once an area is lost, it is lost for ever.<br><br>The site has very restricted road access making it unsuitable for large scale residential development. There is a narrow pinch point in Castle Farm Road adjacent to the Listed farm buildings (the very buildings the Application seeks to preserve) which provides the sole road access point to the site and would cause traffic congestion and noise. With 180+ new houses planned, the traffic in and around Castle Farm Road would become intolerable and downgrade the tranquil rural community feel of this corner of South Gloucester.<br><br>The area is subject to SNCI which the Application tends to dismiss because the fields have been used for arable farming for the past years. Whilst the farming may have temporarily disrupted some of the wildlife in the area, I can assure everyone that the wildlife is alive and well in the surroundings. From my kitchen in I have observed all the usual wildlife, birds large and small including pheasants, foxes, squirrels, bats and I even managed to photograph a deer that had wandered up from Hencliffe Wood. Evidence of badgers has also been recorded in the gardens. Once the crops have been harvested the area really comes alive each year, so I believe the farming has had a net positive impact on the wildlife reinforcing its SNCI status. The grass has already refreshed itself and the fields are green again.<br><br>No additional infrastructure has been proposed to support any such development which will place additional burden on existing services such as Doctors, Schools, roads etc. These facilities are vital to a community and are already close to capacity with waiting times to see a Doctor becoming ever longer.<br><br>In conclusion, I believe this Application should be rejected because:<br><br>o It will add pressure to community services which are already fully stretched.<br><br>o Provides no supporting infrastructure.<br><br>o Has very poor road access.<br><br>o Reduces the open space amenity of the area enjoyed by the local community.<br><br>o Encroaches on the Green Belt.<br><br>o Gives nothing back - developers take profit at the expense of the local community. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Paul Chester - P. C. Planning Ltd |
| **Comment ID** | 19722273/1892 |
| **Document Part Name** | Question 20 - Call for Sites |

| | |
|---|---|
| **Comment** | SG471 |
| **Attached documents** | SG471 Land at Woodlands Farm, 103 Badminton Road, Coalpit Heath.pdf (1.0 MB) |

| | |
|---|---|
| **Respondent Name** | David Jonathan Redgewell - TSSA, South West Network, Railfuture, Bus User UK |
| **Comment ID** | 20206209/1895 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | Kingswood Urban Area.<br><br>East Bristol Fringe.<br><br>Call for Sites.<br><br>We would support the Looking a Housing sites in East Bristol Fringe at Oldland Common, Bitton, Willsbridge, Bath Road, Warmley, and Siston at Park Farm, Barry Road. Nurseries Barry Road.<br><br>Land to rear of Redfield Edge Primary School but would need Public Transport Links.<br><br>Needs new bus services and Light Rail Link to Bristol and Bath.<br><br>Sawmill Bridgeyate.<br><br>Homeapple Hill.<br><br>Land at The Griffin providing the Public House is retained.<br><br>Would need improvement to Bus Service 35 Bristol - Kingswood - Marshfield Bus Services.<br><br>Land at Webbs Heath and Siston Lane.<br><br>Land at Shortwood Golf Club.<br><br>Land at North of Warmley East Fringe.<br><br>This would need extension of MetroBus from Emersons Green to Warmley and Keynsham and the reopening of the Bitton Railway Line as a Light Rail Corridor to Bath through Bitton to Bath and onwards to Bristol City Centre via Staple Hill and Fishponds.<br><br>Land at Pucklechurch West of the village and at Marsh Farm East of the Village.<br><br>Would require Public Transport Investment in the Bristol to Yate Bus services X49 and Bath to Stroud via Yate Bus Station 622.69 Stagecoach.<br><br>Land at Brewery Hill Upton Cheyney.<br><br>Would be difficult to serve by Public Transport.<br><br>Kingswood Sq Bitton Court Farm Junction.<br><br>Hill Willsbridge.<br><br>Could be serviced by an Improved Bath to Bristol 37 Bus Corridor and Reopening the Sheet. |

| | |
|---|---|
| | The Bristol to Bath rail cycleway route as a Light Rail Line with stations at Kelston, Bitton, Oldland Common, Warmely, Mangotsfield, Emersons Green, Staple Hill, Fishponds, Easton, Bristol City Centre.<br><br>These urban extension Could help With sustainable development providing Affordable Housing is included and Employment land is developed in Longwell Green and Kingswood.<br><br>This would also require co-operation with BANES on Employment in Bath and Keynsham and the MCA WECA MetroBus to South Bristol via Whitchurch from Emersons Green.<br><br>Keynsham Station provides a railhead for Bitton and Willsbridge on Metro West. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | A. Hunter - GL Hearn |
| **Comment ID** | 19728801/1896 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG403 |
| **Attached documents** | SG403 Land at Ryedown Lane, Bitton.pdf (1.9 MB) |

| | |
|---|---|
| **Respondent Name** | Lee Searles - Enzygo Ltd |
| **Comment ID** | 15932897/1897 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG405 |
| **Attached documents** | SG405 Land at Pool Farm, Whitfield, Wotton Under Edge.pdf (3.1 MB) |

| | |
|---|---|
| **Respondent Name** | Simon Russell - Integer Planning & Development |
| **Comment ID** | 19435265/1898 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG407 |
| **Attached documents** | SG407 Land Adjacent to The Homestead, Manor Road, Wick.pdf (939 KB) |

| | |
|---|---|
| **Respondent Name** | Andy Perkins |
| **Comment ID** | 330561/1899 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG269<br><br>Dear ,<br><br>Thanks for your phone message last week. Listening to your message I suspect what has happened is that our name has been put against this site as we have had numerous dealings with all manner of Planning and Officers over the years. The most recent of these has been in relation to the owners suggested desire to redevelop the site – albeit one that seemed to come about after several were made about the state of the site. I believe the owner has had some Plans drawn up and we have commented on them, but that has been the limit of our involvement.<br><br>If you need a response to the email below it should be that we have no association with the site other than being local Members and we are not promoting the site. If the owner wishes to do that, he can do so himself.<br><br>Contents of email referenced above are as follows:<br><br>Local Members are a bit confused by this. When did we promote this site previously? |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alex Atkinson - Edward Ware Homes Ltd |
| **Comment ID** | 20852385/1900 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG408 |
| **Attached documents** | SG408 Land East of Trinity Lane, Chipping Sodbury.pdf (1.1 MB) |

| | |
|---|---|
| **Respondent Name** | Tom Collins - nineteen47 Ltd |
| **Comment ID** | 19729377/1902 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG409 |
| **Attached documents** | SG409 Land South of Stowell Hill Road, Tytherington.pdf (4.2 MB) |

| | |
|---|---|
| **Respondent Name** | Tom Collins - nineteen47 Ltd |
| **Comment ID** | 19729377/1903 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG323 |
| **Attached documents** | SG323 Land at Stable Folly, Stowell Hill Road, Tytherington.pdf (3.8 MB) |

| | |
|---|---|
| **Respondent Name** | Simon & Dawn Sparey |
| **Comment ID** | 20208353/1905 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | The Planning Policy Officer<br><br>South Gloucester Council<br><br>Dear Sir,<br><br>We write with reference to the "Call for Sites" in South Gloucestershire and with particular concern regarding the Green Belt land at The Batch, Castle Farm Road, Hanham.<br><br>We have studied the Planning Documents available online and would like to point out that the access to the proposed site via Castle Farm Road is not suitable for the extra traffic that this development would entail. The Applicant states that the houses in Castle Farm Road all have off street parking and because of this the road could cope with the extra traffic generated. We would like to point out that in the years the congestion on Castle Farm Road has increased significantly. Please see the attached photographs to illustrate the parking on Castle Farm Road. It is virtually impossible for two cars to pass on the road now due to the number of cars parked on both sides of the road. Many of the cars are parked partially on the pavement making walking hazardous especially with young children. Due to the residential parking on Castle Farm Road it is effectively a single lane road. Some of this parking area will be lost with the proposed development of the barns at Castle Farm. The road is particularly narrow by Castle Inn Farmhouse and West Hanham House which are Listed Buildings and the Applicant has suggested making this even narrower. This would be extremely detrimental to the look of important Listed Buildings.<br><br>The Applicant states that Phase 1 of the development with 60 - 80 houses would result in an extra 30 vehicles per hour during peak periods. This is very optimistic on the Applicant's part. Every house is likely to have at least two cars and if they are family homes the number of cars would increase further. The Applicant also seems to assume that most traffic exiting the proposed area would turn left out of Castle Farm Road onto Abbotts Road, but if this traffic were heading towards Bath/Keynsham areas it is far more likely that the traffic would turn right and head through the extremely narrow part of Abbotts Road by The Elm Tree Public House. This narrow road can be extremely hazardous at peak times and only recently has had speed bumps installed to slow down the traffic. There is another extremely narrow area at the approach to Court Farm where the width allows only one car at a time to pass through. The Applicant's assumptions that sustainable travel and minimising single occupancy car travel will be encouraged are extremely optimistic and quite frankly nonsense.<br><br>The area in question abuts an area of SNCI and SSSI and a dedicated local nature reserve, The Avon Valley Woodlands. We frequently see deer, rabbits, foxes and badgers on this land. It is reported that pine martens have been seen here. We have bats that live in our roof and use the fields opposite as their hunting ground together with owls, tree creepers, skylarks and jays. At present there are large colonies of field fares feeding in the fields where the development is proposed. There is a large heronry on the river and we frequently see the herons and swans flying over these fields. There are also newts, slow worms and grass snakes There are numerous old stone walls across the site which are home to Hazel Dormice. Destruction of these walls would remove this vital habitat and even if the original stone walls were retained it is unlikely that the dormice would stay in a built up area. The Dormouse Conservation Handbook states " **Hazel dormice** are sensitive to weather and climate, both directly and indirectly, through their specialised feeding **requirements**. They are particularly affected by **habitat** deterioration and fragmentation and also by inappropriate **habitat** management. For these reasons, they are highly vulnerable to local extinction." |

| | |
|---|---|
| | The feeding/hunting ground of these animals would be severely diminished with the addition of 180+ houses with the associated noise and street lighting. Bats are recognised to hunt in open tree habitats such as pasture, parkland and hillsides and the flight is low and fluttering with brief glides. This habitat will be lost to the proposed development.<br><br>The developers proposal for low level street lighting doesn't take into account the lighting from the windows of the houses, security flood lighting to the houses, car headlights which will all cause light pollution and the associated noise which will disturb the wildlife that use this site. We should be preserving green spaces and the Biodiversity for future generations not destroying it.<br><br>There have been previous Applications for this site and the developer has intentionally removed the original fauna and flora from this site and turned it into agricultural land with the hope of getting its Green Belt status removed. The Applicants own Survey from Grass Roots has still found significant areas of Biodiversity despite the developer's intention to remove it all. The surrounding area has a long history of agricultural heritage and this should be preserved. The proposed development would have a detrimental impact on the whole of the Avon Valley Woodlands and the Biodiversity contained therein.<br><br>There is no infrastructure for the additional houses, it is virtually impossible to get a Doctor's appointment at the local Surgery now and the same with Dentists. Will the local Schools be able to offer places for all the additional children this development would generate?<br><br>On a personal note we are very concerned regarding the proposed development of this area. We directly the fields concerned and is a "Locally Listed Building" dating back some years. If this development were to go ahead the outlook from our property would be severely diminished. The developer proposes a picnic/play area immediately . This would result in a loss of views and privacy and would be out of character and overbearing in terms of appearance. There is already a picnic area between and the car park for Avon Valley Woodlands. This development would see sandwiched between two picnic/play areas. There are already problems with anti-social behaviour from some users of the existing car park and picnic area. The car park is frequently used for , is often full of litter and is used as a racing track. The picnic area is often littered and we have had bags of litter dumped in our garden. On occasion tents have been erected in the picnic area and it has been used as a camp site. It would be unbearable to have play/picnic areas to the side and front of our property and would have a significant detrimental impact on the enjoyment of our property.<br><br>We appreciate that housing needs to be delivered but there are numerous Brownfield sites that should be used before tearing up the Green Belt, i.e. the Kleeneze site. If the Green Belt is used it is lost forever and to all future generations. |
| **Attached documents** | 20180415_153044.pdf (2.4 MB)<br>20180415_152841.pdf (2.9 MB)<br>20180415_153100.pdf (2.5 MB)<br>20180415_153103.pdf (2.5 MB)<br>20180415_153047.pdf (2.4 MB) |

| | |
|---|---|
| **Respondent Name** | The Holiday Inn, Filton |
| **Comment ID** | 20209185/1914 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | **South Gloucestershire Draft Local Plan Preferred Site Allocation.**<br><br>**Response on behalf of The Holiday Inn, Filton Road, Bristol.**<br><br>**Objection: The hotel site should be removed from the Green Belt or recognised as a development site.**<br><br>1. The Holiday Inn site (See attached Location Plan) has been allocated as Green Belt wherein new development has been strictly limited for many years.<br><br>2. Whilst some modestly scaled development might be possible under Green Belt Policy, the hotel is constrained from a more wide reaching review of its operation by the restrictive nature of that Policy. Future works to the Holiday Inn will be necessary to maintain standards, currently these works are restricted by its location in the Green Belt. Lack of ability to upgrade the hotel when necessary could be detrimental to the hotel's success.<br><br>3. The site makes little, if any, positive contribution to the purpose of the Green Belt as defined in the NPPF:<br><br>i) It does not contribute to the limitation of urban sprawl as there is significant built development in the form of Bristol Business Park and the University of the West of England Campus to the West of the site. The site itself is also well developed with multi-storey buildings.<br><br>ii) It does not contribute toward the prevention of merging towns. There is significant open space between the hotel and site and the next nearest town, Frenchay. The M32 to the East of the site acts as a barrier to development between the site and Frenchay, should this site be released from the Green Belt significant open space would remain, avoiding the merging of settlements.<br><br>iii) It does not safeguard the countryside from encroachment as the site cannot be identified as 'countryside' as it lies within the Settlement Boundary in accordance with the current adopted Core Strategy.<br><br>iv) It does not preserve the setting or special character of an historic town.<br><br>v) The site is already well established as a hotel site and therefore allowing works on this hotel would not impede urban regeneration. |

| | |
|---|---|
| | 4. Hotels are not usually recognised as “employment uses” but they are significant employers, usually of local people, offering a variety of employment in terms of training, skills and shift patterns. Furthermore, other businesses such as those in Bristol Business Park are reliant upon the availability of good quality accommodation for those travelling for business. Hotels also capture the spending of overnight and daytime guests in the town providing secondary economic benefits and employment.<br><br>5. South Gloucestershire’s adopted Core Strategy states that the extent of the Green Belt is to remain the same other than a few exceptions. Land to the East of Harry Stokes and North of the hotel site is noted as one of these exceptions. This land is seen to provide land to help meet future housing requirements and is therefore considered to have ‘exceptional circumstances.’ However, this land falls outside of the defined Settlement Boundary so its release would allow encroachment on the countryside, causing more harm in accordance with the NPPF Green Belt purposes compared with the Holiday Inn site.<br><br>6. The West of England Joint Spatial Plan has been submitted to the Secretary of State in April 2018. This Plan has increased the housing requirements across the four Authorities (Bath & North Somerset, Bristol City, North Somerset and South Gloucestershire) by 72% from 61,500 to 105,500. To accommodate for this demand suitable sites need to be identified, in turn this could result in releasing the Green Belt to allow for development. As previously stated hotels are good sources of local employment. Releasing the Holiday Inn site from the Green Belt would allow the hotel to update/expand as necessary. Increasing the size of the hotel, would require additional staff members, with the need for an additional 105,500 homes across the West of England ensuring local jobs for local people is vital to creating sustainable communities. If the Green Belt boundaries are to be reviewed in light of the above increased housing trajectory, it seems appropriate timing to consider the hotel site, to avoid the piecemeal release of individual sites.<br><br>**Conclusions:**<br><br>7. The site should be removed from the Green Belt or should be specifically identified as a developed site where the full rigour of Green Belt Policies will not be applied. |
| **Attached documents** | The Holiday Inn, Filton - Walsingham Planning (Jenny Keith).pdf (327 KB) |

| | |
|---|---|
| **Respondent Name** | Ian Beckey - Bus User UK, Railfuture, Severnside, South West Transport Network |
| **Comment ID** | 20209729/1921 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | Stoke Gifford, UWE, North Bristol.<br><br>Harry Stoke/Stoke Gifford.<br><br>The MetroBus route needs designing through Bristol Parkway Station onwards to the Stoke Gifford Transport Links and onwards to Gypsy Patch Lane and Patchway Station. Not shown on the Map to Filton, Cribbs Causeway Bus Station and Henbury Railway Station.<br><br>Support new Town and District Centre on the Sainsbury's and B and Q Site.<br><br>High density Housing along the Ring Road part rent and part buy.<br><br>Sainsbury's need a Public Realm Strategy With Footway public Sq The Milton Keynes style of South Gloucestershire Council needs to change.<br><br>The area needs Improvements to the Bus Stops Shelter Bus Services Evening and Sunday Links.<br><br>No. 10, Emersons Green o BRISTOL PARKWAY Via UWE Bus Station to Southmead, Westbury-on-Trym, and Avonmouth/Shirehampton Through Buses.<br><br>Filton Abbeywood Station needs a Bus Link as does Filton Avenue.<br><br>Bus and Coach/Rail Interchanges at Filton Abbeywood.<br><br>Bristol Parkway Station, Patchway Station.<br><br>UWE Bus Station to Include Coach Services.<br><br>Stoke Gifford Transport Hubs.<br><br>Sainsbury's. |

| | |
|---|---|
| | Wise College.<br><br>Hatchet Lane.<br><br>Stoke Gifford Transport Links.<br><br>More student blocks around UWE Shops and Nighttime economy at Filton Abbeywood Shopping Centre.<br><br>More Bus priority on the Ring Road. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mr. & Mrs. Flanders |
| **Comment ID** | 19453249/1941 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG256 |
| **Attached documents** | SG256 Land at 145 - 147 Park Lane, Frampton Cotterell.pdf (3.7 MB) |

| | |
|---|---|
| **Respondent Name** | Brian Wilson |
| **Comment ID** | 19729313/1942 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG406 |
| **Attached documents** | SG406 Land at Woodhouse Eaves.pdf (2.5 MB) |

| | |
|---|---|
| **Respondent Name** | Claire Dolman - Hanham Abbots Parish Council |
| **Comment ID** | 1060929/1943 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG259 |
| **Attached documents** | SG259 Hanham Abbots Parish Council (Claire Dolman).pdf (1.1 MB) |

| | |
|---|---|
| **Respondent Name** | Philip Sparkes |
| **Comment ID** | 19728929/1944 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG404 |
| **Attached documents** | SG404 Land at Engine Common, Yate.pdf (1.0 MB) |

| | |
|---|---|
| **Respondent Name** | Richard Williams |
| **Comment ID** | 14382657/1945 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG170 |
| **Attached documents** | SG170 Land at Totteroak Farm, Horton.pdf (1.8 MB) |

| | |
|---|---|
| **Respondent Name** | Nigel Cox |

| | |
|---|---|
| **Comment ID** | 19728769/1946 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG402 |
| **Attached documents** | SG402 Land at New Farm, 215 Bristol Road, Frampton Cotterell.pdf (2.0 MB) |

| | |
|---|---|
| **Respondent Name** | Suzanne Robson/ Robert Davies - Gerald Eve LLP |
| **Comment ID** | 14953281/1957 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG482 |
| **Attached documents** | SG482 Land at Engine Common Site.pdf (883 KB) |

| | |
|---|---|
| **Respondent Name** | Kevin Hunt - JLL |
| **Comment ID** | 2880865/1960 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG478 |
| **Attached documents** | SG478 Land at Stover Trading Estate, Millbrook Road, Yate.pdf (2.9 MB) |

| | |
|---|---|
| **Respondent Name** | Sean Lewis - Tetlow King Planning |
| **Comment ID** | 14471937/1966 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG472 |
| **Attached documents** | SG472 Land to Rear of Mount Pleasant Farm, Longwell Green.pdf (6.3 MB) |

| | |
|---|---|
| **Respondent Name** | Lee Searles - Enzygo Ltd |
| **Comment ID** | 15932897/1967 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG460 |
| **Attached documents** | SG460 Land at The Grange, Elberton.pdf (1.1 MB) |

| | |
|---|---|
| **Respondent Name** | GPG Ltd |
| **Comment ID** | 20219361/1969 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG458<br><br>**South Gloucestershire Local Plan Consultation/Call for Sites February 2018 (5th February - 30th April 2018)**<br><br>The second part of this Statement is submitted in response to the Call for Sites exercise which is being undertaken in tandem with the new Local Plan to assess the potential for new sites to be considered for both housing and/or employment opportunities.<br><br>We have therefore been instructed to forward the following site for consideration by the owners under the Council's current Call for Sites exercise and as an integral part of the new Local Plan process 2018 - 2036.<br><br>Part 2: Call for Sites - Land to the Rear of the Beaufort Hunt Public House, Chipping Sodbury:<br><br>The site is shown edged red of the attached Plan. It is intended that the Public House will remain as existing and part of the long rear garden which is currently underused at its Southernmost end be considered for housing development. The site is located in the heart of Chipping Sodbury situated between Broad Street and Arnold Court to the rear with housing to the rear on the South side of Arnold Court and a number of similar rear Plots having been developed for housing. |

| | |
|---|---|
| | The proposal as stated would involve only part of the rear garden of the Public House with vehicular access from Hounds Road via Arnold Court and requiring the removal of a section of boundary stone wall to enable rear access to be provided to the site.<br><br>The surrounding area to the rear comprises both traditional and mews style development primarily of two storey construction. The site could accommodate a variety of house types which could be determined as part of a future Application. It should be noted that this site is not visible from Broad Street and any future development would need to be considered against the Conservation Area criteria in this central part of Chipping Sodbury.<br><br>The site is located very close to the centre of Chipping Sodbury with its wide range of shopping and service activities being within walking distance of the High Street and nearby new Waitrose store. The site is therefore located in an extremely sustainable location.<br><br>We understand that all utility services are available to the site and that development could take place without the need to upgrade existing facilities.<br><br>We contend that the principle of development in this location is acceptable given current adopted Core Strategy Policies and that an acceptable form of development could be achieved in this highly sustainable location.<br><br>We therefore submit this site for consideration within the Council's Call for Sites exercise currently underway. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Marcus Plaw - CBRE Ltd |
| **Comment ID** | 17918497/1986 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG453 |
| **Attached documents** | SG453 Land at Church Lane (East of Elberton Road), Elberton.pdf (705 KB) |

| | |
|---|---|
| **Respondent Name** | Michael Orr - CSJ Planning Consultants |
| **Comment ID** | 3972897/1987 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG451 |
| **Attached documents** | SG451 Land Rear of Acacia Avenue.pdf (2.1 MB) |

| | |
|---|---|
| **Respondent Name** | Kit Stokes - Stokes Morgan Planning Ltd |
| **Comment ID** | 19451073/1989 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG425 |
| **Attached documents** | SG425 Land on the North Side of Shaymoor Lane, Pilning.pdf (2.7 MB) |

| | |
|---|---|
| **Respondent Name** | Severnside Distribution Land Ltd (SDLL) |
| **Comment ID** | 16468705/1992 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | Dear Sir/Madam,<br><br>**LOCAL PLAN CONSULTATION DOCUMENT (FEBRUARY 2018 DRAFT) - RESPONSE OF SDLL CONCERNING THE CASE FOR ALLOCATING PLOT 2 CENTRAL PARK FOR THE PROVISION OF COMPLEMENTARY ROADSIDE SERVICES TO SUPPORT THE ENTERPRISE AREA**<br><br>I refer to the above and thank you for the invitation to Comment on the Local Plan Consultation Document.<br><br>This Response is made on behalf of Severnside Distribution Land Ltd (SDLL). SDLL is developing the strategic scale Central Park employment scheme at Severnside which now includes the distribution operations of major national and internationally renowned businesses.<br><br>The continuing success of Central Park, and the wider Enterprise Area, will be critical to the delivery of current and future ambitions for the region. As development of major employment uses has progressed at a rapid pace, it has become increasingly apparent that the businesses and the massive new workforce, require complementary services to maximise economic success. |

| | |
|---|---|
| | Engagement with businesses that have established in this area has identified a pressing need for services to include petrol filling stations, convenience shops, food and drink outlets, cafes and a hotel (potentially with meeting facilities).<br><br>SDLL considers that Plot 2 at Central Park, immediately adjacent to the committed new M49 Junction, is the perfect location to meet these demands through a planned high quality development. SDLL has held a number of initial meetings with the LPA's Senior Officers who have confirmed support in principle, subject to detailed and scheme specific considerations.<br><br>Although the content, nature and precise scale of the facilities remains fluid and flexible and will respond to market demand, it is recognised that any scheme will involve development beyond the scope of the '1957 Consent' and a separate Planning Application will be required. As a result, SDLL considers that there is a strong Planning case to include an allocation for such a facility on Plot 2 in the Emerging Local Plan. Such an allocation can be supported by a suitable criteria based Policy.<br><br>SDLL hopes that this suggestion will be considered and appropriate amendments made to the Local Plan. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | The Golledge Estate |
| **Comment ID** | 19896833/1993 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG414<br><br>**1. Introduction:**<br><br>1.1 These Representations on the South Gloucestershire Local Plan February 2018 Consultation Document are submitted on behalf of The Golledge Estate, an independent owner of a Plot of land known as 'Land on the North East Side of Old Gloucester Road, Hambrook, Bristol' in Stoke Gifford. An aerial image of the site is shown below (note boundary is approximate for indicative purposes only and drawing is not to scale).<br><br>1.2 The Representations are set out in response to Local Plan Consultation Question 2 on Urban Localities, as explained in Chapter 3.<br><br>1.3 These Representations set out the opportunities presented by potential development on the subject site, which is already allocated as part of the East of Harry Stoke New Neighbourhood. Planning of this new neighbourhood is well progressed, but this piece of land has not been acquired by the principal housebuilder in control of the delivery of the neighbourhood (Crest Nicholson), and so proposals for this site have not yet been brought forward.<br><br>1.4 These Representations are supplemented with a parallel Call for Sites Form and associated Site Location Plan and Property Register Entry (Number GR418884).<br><br>Please see the attached Document for Figure 1.1 which is referenced below.<br><br>**Figure 1.1: Approximate site red line aerial**<br><br>**2. Current Policy Context:**<br><br>2.1 The subject site is within the boundary of the designated East of Harry Stoke New Neighbourhood, as shown in Figure 2.1. below. This is an excerpt from the Council's Online Proposals map.<br><br>Please see the attached Document for Figure 2.1 which is referenced below.<br><br>**Figure 2.1: East of Harry Stoke New Neighbourhood (Source: southglos.gov.uk)**<br><br>2.2 Adopted Policy CS27 sets the parameters for development of the East of Harry Stoke New Neighbourhood, which required release of land from the Green Belt. The Policy makes provision for a comprehensive range of uses as part of a new mixed use community. An area-wide SPD was adopted in May 2016 to comprehensively plan for the development.<br><br>2.3 Policy CS27 notes that the new neighbourhood allocation should include 'well planned and integrated Green Infrastructure including a Strategic Green Corridor for amenity, recreation, woodland and wildlife use along the Eastern edge of the site. A Map for the New Neighbourhood which is for 'illustrative purposes only' is provided in the adopted Core Strategy Figure 5 (reproduced at Figure 2.2. below). This is very low resolution but has 'Significant Green Infrastructure in the New Neighbourhood' marked around the edge of the M4. The adopted SPD also includes an Illustrative Framework Diagram. However the red line in this does not encompass the subject site. No other Policies in the Core Strategy or proposal's Map confirm the site as being allocated specifically for Strategic Green Infrastructure.<br><br>2.4 Therefore our understanding in this Policy context is that proposals for development of the land which is in keeping with the broad principles of the New Neighbourhood allocation would not in principle be contrary to existing adopted Policy. This stage in the Plan-making process offers an opportunity to more clearly specify a role for the site which is both complementary to its position in the New Neighbourhood and which contributes to the aims of the Emerging Local Plan – notably the 'New Approach to Urban Living.'<br><br>Please see the attached Document for Figure 2.2 which is referenced below. |

**Figure 2.2: Excerpt from the South Gloucestershire Adopted Core Strategy (2013).**

**4. Site Proposals:**

4.1 An Illustrative Sketch Layout for the subject site is provided in Figure 3.1. This responds to the previously discussed points in the Emerging Local Plan and delivers a mix of commercial and residential uses. This Sketch is based on an analysis of the Plans being brought forward as part of the wider East of Harry Stoke Neighbourhood, alongside Studies of nearby precedents which have incorporated designed separation distances from Motorways to ensure sufficient noise mitigation.

**Emerging Road Network:**

4.2 From inspection of the East of Harry Stoke New Neighbourhood Plans and discussion with South Gloucestershire Officers it is understood that no closure is proposed of any part of Old Gloucester Road which services the site. There will however be a provision of pavements and cycle lanes along parts of it, presumably in connection with the Crest development. There do not appear to be any Plans for a roundabout at the Northern end of the road. The Junction with the B4057 is currently formatted on a no right turn basis for traffic exiting Old Gloucester Road from the North.

**Motorway Separation:**

4.3 Many other commercial, employment floor space and residential developments in South Gloucestershire come close to the M4, M5 and M32 Motorways. Separation distances vary and it is likely that these are determined on a user-by-user basis, depending on the design/insulation of the buildings and occupant needs. There are examples of commercial premises separated from the highway by narrow tree planting immediately North of the site at Amcor Flexibles and at Aztec West. The current development at Emersons Green has new commercial buildings being built relatively close to the Motorway here.

4.4 Along the M32 there are two residential developments on the Southern side of the M32 at Stapleton. There appear to be no residential developments that come near to the M5 in the area close to the Bristol Fringe. On the M4, the Bradley Stoke development was designed to come close to the M4/M5 Junction.

4.5 From this analysis separation distances appear to be 18 - 20 metres for non-residential buildings and 40 metres for the closest dwellings. In the latter case such a distance relates only to development presenting blank gable ends towards the Motorways. For housing developments with their windows running parallel with the Motorway an extra garden length, circa 11 metres is added to this measurement. In most cases and possibly all, these distances are used in conjunction with an acoustic barrier sometimes in the form of a heavily planted earth berm.

**Landscaping and Tree Screening:**

4.6 The plans incorporate a tree screen at the B4057 end, so the buildings here can be visible where it has the benefit of sightlines over the bridge parapets where the M4 crosses the B4057. The buildings are set well back from the site boundary on Old Gloucester Road so that the existing hedge and hedgerow trees can be kept, supplemented by new trees planted within the wide verge. This approach would allow Old Gloucester Road to retain its rural character if this is judged as desirable whilst still accommodating development. The ambitions of the Core Strategy Green Infrastructure Policy would be best served by recognising this character and building on it.

4.7 The existing hedge screen would be replanted as a tree screen and incorporating an acoustic barrier positioned as necessary to meet the required acoustic standards. The tree screen would be thickened out in the gaps between the buildings to enable more substantial trees to grow here.

4.8 Presently two footpaths come down from the Crest site to Old Gloucester Road, one joining approximately centrally along the subject site, and the other alongside the boundary with the smallholding to the South. The Illustrative Plan shows the tree screen thickened up along the boundary with the smallholding at the South to give the residential separating distance from the edge of carriageway of 40 metres. The footpath is then taken through this wide tree belt to create a footpath loop useful in the context of the Crest development as a dog walk or exercise track.

4.9 Note that in order to better contribute to the rural character of Old Gloucester Road additional landscaping has been proposed to the Western boundary between the road and buildings. If it were found to be desirable to have more of this planting on the Eastern boundary with the Motorway this could be accommodated.

**Commercial Element:**

4.10 The Northernmost commercial building (A) illustrated at the B4047 end here has a floor plate of circa 10,000 sq ft. An example operator for this kind of unit might be a motor dealership. This might be operated in conjunction with the second building (B) on the site which could be a servicing facility, with generous car parking between the two. This building has a floorplate of circa 17,000 sq ft. Two smaller footprint buildings are then shown (C and D, 4,000 and 9,600 sq ft respectively) to make the overall development shape visually yield to the greener character of the Southern end of the site, whilst allowing two smaller buildings to be served from the common access, which coincides with the existing access point.

**Residential Element:**

4.11 The Illustrative Masterplan shows apartments positioned on the Southern part of the site in a way that makes good use of its sloping topography. The buildings are shown as ellipsis in Plan to convey that the built form is intended to be subservient to the landscape aspects of the site; landscape and tree planting flows around the built form. At the centre site these buildings might be three storeys but as the ground falls they might get to four, lower down of this. The buildings are designed on the basis of having three apartments per floor, generating approximately 36 - 48 units overall.

4.12

Please see the attached Document for Figure 3.1 which is referenced below.

| | |
|---|---|
| | Figure 3.1: Illustrative Layout, Land at Old Gloucester Road<br><br>**5. Conclusions:**<br><br>5.1 The Golledge Estate welcomes the Local Plan Consultation and the identification of the Harry Stoke/Stoke Gifford New Neighbourhood as an Urban Living Opportunity Area. The aims of this approach to maximise the use of allocated land within the urban areas for both residential and employment uses in order to improve and restore the status and performance of the urban areas are recognised.<br><br>5.2 The Golledge Estate land offers opportunities to deliver both commercial and residential development which is in line with the existing allocation and responsive to the Consultation Plan's ambitions. A considered mix of commercial uses in this location at the periphery of the New Neighbourhood can both assist with decanting existing employers out of more central areas in need of densification and help create more modern working premises. By combining this with some higher density residential uses and multifunctional landscaping the site could play a significant role in wider aims of developing a stronger sense of place, character, scale and better integration across the area – both at the site and elsewhere in the Plan area.<br><br>5.3 Furthermore the site's location outside of the ownership of the emerging New Neighbourhood Planning Application area represents an opportunity for the Council to meet their aims of encouraging a mix of potential developers to come forward with alternative models of delivery.<br><br>5.4 The Consultation Plan is focused on the delivery of Urban Living and as such leaves the finer details of employment land allocations to be determined at a later stage. It is proposed that the full potential of The Golledge Estate land is reviewed as part of the ongoing Plan-making process and against 'Urban Living' criteria, with a view to renew its allocation at a greater detail in line with its new status within the Stoke Gifford Urban Living Opportunity Area. |
| **Attached documents** | The Golledge Estate - Nash Partnership (Leigh Dennis).pdf (779 KB)<br>18036_H01_004_Old Glos Rd Indicative Layout_180427.pdf (293 KB)<br>18036_H01_003_Old Glos Rd Register and Title Plan_180427.pdf (122 KB) |

| | |
|---|---|
| **Respondent Name** | Leigh Dennis - Nash Partnership |
| **Comment ID** | 19425921/1995 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG414 |
| **Attached documents** | SG414 Land on the North East Side of Old Gloucester Road, Hambrook.pdf (1.3 MB) |

| | |
|---|---|
| **Respondent Name** | John White - Arena Global Management Ltd |
| **Comment ID** | 19721185/1996 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG413 |
| **Attached documents** | SG413 Land at The Carpenters Arms, 10 Church Road, Wick.pdf (4.1 MB) |

| | |
|---|---|
| **Respondent Name** | Stevan Usher - Homewood Estates Ltd |
| **Comment ID** | 19732001/1997 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG362 |
| **Attached documents** | SG362 Land off Redfield Hill, Oldland Common.pdf (82 KB) |

| | |
|---|---|
| **Respondent Name** | Stevan Usher - Homewood Estates Ltd |
| **Comment ID** | 19732001/1998 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG363 |
| **Attached documents** | SG363 Land off High Street, Oldland Common.pdf (82 KB) |

| | |
|---|---|
| **Respondent Name** | Redmaids' High School |
| **Comment ID** | 19896001/2002 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG604<br><br>Dear Sirs, |

| | |
|---|---|
| | **South Gloucestershire New Local Plan: Consultation Document (February 2018)**<br><br>I write on behalf of my Client, Redmaids' High School, with regard to the above referenced Local Plan Consultation.<br><br>I set out below specific Representations on the future of the Local Plan in the light of my Client's land interests at the Sports Ground, Station Road, Henbury, Bristol BS10 7TB (a Plan indicating the extent of the land ownership is attached).<br><br>Having acquired the land in 2017, Redmaids' and its professional advisors are currently reviewing options for the future of the site and, concurrently with these Representations will be engaging in early discussions with South Gloucestershire Council Senior Officers/Development Management Team.<br><br>However, in the light of the current Consultation, it is considered relevant to submit some brief Comments in respect of the Local Plan and how it engages with our Client's land interests.<br><br>The Redmaids' Sports Ground is currently identified as land located within the Green Belt. Redmaids' acquired the land due to its potential to provide a high-quality sports facility for the School and community and, as such, have no direct intentions to promote the land for any other forms of development. It is recognised that outdoor sports and outdoor recreation are supported in principle by both national and local Policy with regard to Green Belt matters, however, for the School to maximise the quality of the sports facilities on offer it may require, for example, a larger pavilion or other structures. The appropriateness of multiple structures within the Green Belt will be subject to scrutiny in terms of maintaining openness and general character.<br><br>We are also cognisant that extensive developments will be brought forward in the immediate vicinity in coming years which will comprise of thousands of new homes and associated commercial/community uses. Such development will drastically change the character of the local area.<br><br>Redmaids' assert that their land should be omitted from the Green Belt, recognising its sports function but removing the currently restrictive requirements to assess the impact on the openness of the Green Belt. In reality the site is already developed to some extent and will be seen in the direct context of extensive new development in the locality. It is therefore considered that the development of suitable sports facilities should not be constrained by openness related restrictions.<br><br>Alternatively, should South Gloucestershire Council be minded to retain the Green Belt in its existing location, consideration should be given to the merits of identifying the Redmaids' site as a 'sports hub' which would allow an intensification for sports uses, to benefit the School and the wider community, whilst recognising its Green Belt function. This may, for example, be achieved by identifying the site as a location for new indoor and outdoor sports development.<br><br>I would request that Officers take these Comments into account when reviewing the Cribbs Causeway area, and particularly the Green Belt designation and the need for sports facilities in the locality. Redmaids' is committed to the future use of the site for sports provision and, as noted above, will shortly be engaging with South Gloucestershire Council DM Teams with regard to that matter. That said, it is also relevant for the Plan to consider matters relating to sport and recreation and to consider how improvements to existing sports facilities will be achieved. On that basis the proposed amendments to the Plan as set out above are commended.<br><br>Should you require any further information, please do not hesitate to contact me. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Jim Tarzey - Pegasus Group |
| **Comment ID** | 19737761/2007 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG435 |
| **Attached documents** | SG435 Land North of Perrinpit Road, Frampton Cotterell.pdf (1.8 MB) |

| | |
|---|---|
| **Respondent Name** | Matthew Blaken - David James & Partners |
| **Comment ID** | 16471649/2021 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG158 |
| **Attached documents** | SG158 Land Adjacent Westways, Wotton Road, Rangeworthy.pdf (1.3 MB) |

| | |
|---|---|
| **Respondent Name** | Simon Jenkins - Beaupre Castle Developments |
| **Comment ID** | 9147297/2022 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG410 |
| **Attached documents** | SG410 Land at 2 Peters Cottages, Sodbury Road, Wickwar, Wotton-Under-Edge.pdf (1.3 MB) |

| | |
|---|---|
| **Respondent Name** | John Rooney - Stokes Morgan Planning Ltd |
| **Comment ID** | 19730593/2023 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG94 |
| **Attached documents** | SG94 Land on the North Side of Shaymoor Lane, Pilning.pdf (2.3 MB) |

| | |
|---|---|
| **Respondent Name** | James Cole |
| **Comment ID** | 19732257/2031 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG421 |
| **Attached documents** | SG421 Land at Washing Pool Lodge, Main Road, Easter Compton.pdf (270 KB) |

| | |
|---|---|
| **Respondent Name** | Newland Homes |
| **Comment ID** | 2857441/2046 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG78<br><br>**1.0 INTRODUCTION:**<br><br>1.1 This Consultation Representation has been prepared by DLP Planning Ltd (DLP) on behalf of Newland Homes. These Representations are in response to the South Gloucestershire Council New Local Plan 2018 - 2036 Consultation Document and the associated Evidence Base and supports the promotion of land that Newland Homes have interests in at Land Between Aust Road and Elberton Road, Olveston.<br><br>1.2 Newland Homes have not themselves previously promoted the site. However, Land Between Aust Road and Elberton Road, Olveston has been put forward by the landowner as a suitable location for housing as part of the Call for Sites exercise which took place in 2015 (Site Ref: SG000096). The site has also been promoted by the landowner through the West of England Joint Spatial Plan (JSP) process and was submitted to the 'Towards the Emerging Spatial Plan Strategy' Regulation 18 Consultation in November 2016 (Site Ref: SGJSPTESS100).<br><br>1.3 The site is within the Green Belt and just to the North of the current Olveston Settlement Boundary. It is anticipated to be capable of providing around 20 - 30 dwellings including affordable and market housing as well as securing the delivery facilities identified by the Parish Council and local community, such as a car park for the Primary School and an extension to the Cemetery, as the existing Cemetery is reaching capacity.<br><br>1.4 Newland Homes support the Council's approach to the preparation of the SGLP in response to their commitment to plan for the increased levels of growth outlined in the Emerging Joint Spatial Plan (JSP). However, there are a number of issues we believe the Council need to reconsider in order to make the Plan sound, such as the overall housing number, the proposed Housing Distribution Strategy and the use of Green Belt Assessment Stage 2.<br><br>1.5 Newland Homes support the identification of Thornbury as a Strategic Development Location (SDL). However they think it is important that the Council look to allocate sites for non-strategic development in the most sustainable locations so that they are not overreliant on large sites coming forward and that the Strategy proposed is the most sustainable possible.<br><br>1.6 Chapter 3 of this Report sets out Newland Homes' consideration of the overall SGNLP.<br><br>Newland Homes consider there to be significant questions surrounding the potential Distribution Strategies outlined in the Plan and whether these present the most appropriate locations for growth.<br><br>1.7 Chapter 4 discusses the constraints and opportunities for Land Between Aust Road and Elberton Road, Olveston in further detail, to illustrate that the site is largely unconstrained by absolute constraints.<br><br>1.8 Chapter 5 looks further at the benefits of the site. This Chapter covers the following:<br><br>o Community benefits of the site;<br><br>o Its contribution to the Green Belt;<br><br>o Sustainability of Olveston;<br><br>o Transport and Access;<br><br>o The Olveston Parish Housing Need Survey results; and<br><br>o The site's availability, achievability and deliverability. |

1.9 A Site Location Plan, Constraints Plan and Landscape Plan have both been provided as part of this Submission (see Appendices).

**4.0 THE PROPOSED SITE:**

4.1 The proposed site, outlined in red on the enclosed Site Location Plan at Appendix 1, is located in between Aust Road and Elberton Road to the Northern edge of Olveston. The site covers approximately 1.82 hectares and currently comprises agricultural land.

4.2 The site is outside of the Olveston Settlement Boundary and within the Green Belt. For the avoidance of doubt, the site is not within the Olveston Conservation Area.

4.3 The site is bounded to the North by a residential property and Olveston Nursery, as well as an area of trees/vegetation. To the East it is bounded by Elberton Road, on the opposite side of Elberton Road there is a ribbon of terraced houses. Access in to the site is currently via a field gate from Aust Road to the West.

4.4 The following parts of this Section looks at the constraints and opportunities associated with Land Between Aust Road and Elberton Road.

**Constraints:**

4.5 By considering the potential site constraints and opportunities below, we are able to highlight how development in this location would be achieved. A Constraints Map is provided in Appendix 2. The site is affected by the following constraints:

o Located within Green Belt (see Chapter 5);

o Located outside of the Olveston Settlement Boundary;

o The site is within Flood Zone 1;

o The site is not within the Olveston Conservation Area;

o The site is not crossed by any Public Rights of Way (PRoWs).

**Opportunities:**

4.6 The site presents the following opportunities:

o The site is well-contained and will deliver market housing and Affordable Housing in the short-term;

o The site has sufficient capacity to provide additional car parking for the nearby Primary School, which currently suffers from with congestion in pick up drop off time.

o The site has sufficient capacity to provide an extension to the Cemetery, which is nearing capacity.

o A village gateway could be created adjacent the Western boundary of the site at Aust Road, providing a sense of arrival and lowering vehicle speeds.

**Olveston Parish Housing Needs Survey (2016):**

4.7 During November and December 2015, the Strategic Housing Enabling Team of South Gloucestershire Council, on behalf of and in conjunction with Olveston Parish Council, undertook an independent Affordable Housing Needs Survey for Olveston Parish. Olveston Parish includes the settlements of Tockington, Old Down, Awkley, Lower Hazel and Ingst.

4.8 The purpose of this Housing Needs Survey was to identify the level and type of Affordable Housing required for those households that are in housing need or in housing that no longer meets their requirements within Olveston Parish within the next five years (from the date of the Survey).

4.9 In November 2015 Questionnaires were delivered to all households in Olveston Parish and responses were received, which is considered by the Council to be a relatively high response rate at 52%.

4.10 Although the primary aim of a Housing Needs Survey is to establish if there is a need for Affordable Housing, the Parish Council also asked that a number of questions be included in the Questionnaires to gain information on all types of housing demand in their Parish, such as a need for Starter Homes, need for properties to downsize to and Respondents' preferences for the type of new housing development.

4.11 When asked whether they would be in favour of the development of the following types of homes, the response was as follows:

o 48.6% ( Responses) would be in favour of building a number of homes for local people who wish to downsize.

o 45.0% ( Responses) would be in favour of building a number of Starter Homes if there was a demand.

o 46.4% ( Responses) would be in favour of building Affordable Homes for local people if there is a proven need.

4.12 At Question 19, when asked whether they would support the development of Brownfield, infill or rural exception sites, the most popular option was the development of Brownfield sites with 58% of Respondents replying yes. 54.5% responded yes to the development of infill sites and 23.2% supported the development of rural exception sites.

4.13 In total, Respondents stated that they wished to move in the five years from the date of the Survey. The Survey Report concluded that of these households would require Affordable Housing, of which could afford to purchase a shared ownership property or Starter Home.

4.14 There is therefore evidence to demonstrate there is an unmet need for Affordable Housing for households with a local connection to Olveston Parish.

4.15 Land Between Aust Road and Olveston Road could help the Parish in meeting this unmet need with a proportion of affordable dwellings included as part of the development.

**Community Benefits:**

4.16 The site is capable of providing wider benefits to Olveston Parish who have expressed a need to identify land to deliver a car park for Olveston Church of England Primary School, as it experiences issues with congestion during pick-up and drop-off time. We envisage this to be best located on the highest part of the site (Eastern part) adjacent Olveston Road. The School is located approximately 80 metres to the South of the site, car parking would be linked via an existing pavement along Elberton Road will provide a safe and short walking route to the School. Parking would also be beneficial for Church visitors and users of Village facilities when not being used by the School and would also include landscape enhancement.

4.17 In addition, the Parish have also expressed the need for an extension to the Cemetery at the Church of St. Mary the Virgin as the Cemetery is reaching capacity. The current Cemetery is surrounded on all sides by development so there are no sites available adjacent to it. The site promoted in these Representations is sufficient to provide land for a Church Cemetery expansion.

**5.0 SITE SUITABILITY AND SUSTAINABILITY:**

5.1 Land Between Aust Road and Elberton Road covers an area of 1.82 hectares and has the potential to deliver around 20 - 30 new homes (depending on the detailed masterplanning), Cemetery expansion and School parking. The site is just to the North of the Olveston Settlement Boundary and within the Green Belt and currently comprises agricultural land.

**Green Belt:**

5.2 Olveston is a location identified to be investigated for suitability to deliver non-strategic growth in the HELAA (Housing and Economic Land Availability Assessment) Proposed Methodology. The Village is awash with Green Belt so any new housing in or around the village would have to be within Green Belt.

5.3 Paragraph 80 of the NPPF states that the Green Belt serves five Purposes:

o To check the unrestricted sprawl of large built-up areas;

o To prevent neighbouring towns merging into one another;

o To assist in safeguarding the countryside from encroachment;

o To preserve the setting and special character of historic towns; and

o To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

5.4 Within the JSP Stage 1 Green Belt Assessment produced in 2015, Land Between Aust Road and Elberton Road falls within Cell 9 – Tockington/Olveston. Cell 9 is described as:

*"Comprises open, agricultural which includes the villages of Olveston, Elberton and Littleton-on-Severn. The Green Belt land in this Cell assists in defining Thornbury, Olveston and Tockington as separate settlements. The Green Belt in this Cell directly serves purposes 2, 3 and 5."*

5.5 As part of the JSP, a Green Belt Assessment Stage 2 was undertaken in 2016. Land Between Aust Road and Elberton Road, Olveston is contained within Cell 9b and the Council's assessment of this Cell is included overleaf:

Please see the attached Document for the Assessment of the Cell which is referenced above.

5.6 The Council assess all of the Cells surrounding Olveston overall as making a contribution to the Green Belt. With regards to Purpose 3, almost any area of undeveloped countryside within the Green Belt can be said to contribute to Green Belt Purpose 3 in at least a limited way. The site however, is well-contained as it is bounded on several sides by road infrastructure, residential, Allotments and the nurseries. As such, it is believed to be capable of development without detriment or harm to the function of the Green Belt or to the rest of Cell 9b.

5.7 In summary, the site is located within a parcel of the Green Belt which is well defined and enclosed by several significant physical barriers which detaches it from the wider countryside. In terms of the Purposes of Green Belt it is considered by Newland Homes and backed up by the JSP Green Belt Review and this evidence that the site does not form a significant part of the Green Belt compared to other area being considered for

| | |
|---|---|
| | non-strategic level growth. As a location performing limited function in a sustainable location, the site must be worthy of careful consideration by the Council.<br><br>**Site Availability:**<br><br>5.17 The land is in single ownership. The site is immediately available and no land off-site will need to be acquired to develop the site. There are also no current uses which would need to be relocated.<br><br>**Site Achievability:**<br><br>5.18 The site is an undeveloped Greenfield site and there are no known abnormal development costs associated with the development of the site.<br><br>5.19 The site is sufficient to make an important local contribution to the required housing provision of around 20 - 30 new homes (depending on the detailed master-planning).<br><br>**Site Deliverability:**<br><br>5.20 In terms of developability and deliverability there are also no known constraints which would prevent this site from being delivered within the next five to ten-years.<br><br>6.3 Land Between Aust Road and Elberton Road, Olveston is sustainably located just to the North of the village. Whilst the land is currently designated as Green Belt, it has been demonstrated that it actually provides a relatively limited contribution to the existing Green Belt Purposes and could be developed without detriment to the Green Belt as a whole and the rest of Green Belt Parcel 9b.<br><br>6.4 In order to meet the housing numbers required, specifically the emerging targets set for non-strategic scale sites, and offer further flexibility in terms of delivery, Newland Homes would suggest sustainable sites such as this should be allocated through the SGLP. The development of this site would act as a natural extension to the existing settlement without damaging the integrity of the wider landscape character.<br><br>6.5 The site is currently underutilised and based on this site's sustainable location and ability to potentially deliver wider community benefits for the Parish as discussed in Chapter 5. Development would also sustain the vitality of the existing village facilities and School, it is felt this site should be considered suitable for a housing allocation in the SGLP. |
| **Attached documents** | Newland Homes - DLP Planning Ltd (Mr. Paul Jobson).pdf (1.1 MB) |

| | |
|---|---|
| **Respondent Name** | Alan Williams - Planning Potential |
| **Comment ID** | 16658881/2051 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG70 |
| **Attached documents** | SG70 Land East of Abson Road, Pucklechurch.pdf (1.6 MB) |

| | |
|---|---|
| **Respondent Name** | Barton Willmore |
| **Comment ID** | 20208929/2054 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG4 |
| **Attached documents** | SG4 Land South of Gloucester Road, Almondsbury.pdf (13.0 MB) |

| | |
|---|---|
| **Respondent Name** | Andrew Ross - Turley |
| **Comment ID** | 10758529/2056 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG157 |
| **Attached documents** | SG157 Land at Post Farm, Thornbury.pdf (959 KB) |

| | |
|---|---|
| **Respondent Name** | Andrew Ross - Turley |
| **Comment ID** | 10758529/2057 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG80 |
| **Attached documents** | SG80 Land at Yew Tree Farm, Morton Street, Thornbury.pdf (1.0 MB) |

| | |
|---|---|
| **Respondent Name** | Paul Jobson - DLP Planning Ltd |
| **Comment ID** | 11267937/2060 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG78 |
| **Attached documents** | SG78 Land Between Aust Road and Elberton Road, Olveston.pdf (2.1 MB) |

| | |
|---|---|
| **Respondent Name** | Andrew Penna - Torch Planning |
| **Comment ID** | 20070113/2062 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | Land at Station Road, Charfield |
| **Attached documents** | Torch Planning (Andrew Penna).pdf (470 KB) |

| | |
|---|---|
| **Respondent Name** | Sara Tucker - North & Letherby Ltd |
| **Comment ID** | 19730785/2065 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | Land North of High Street, Iron Acton, South Gloucestershire<br><br>Dear Sir or Madam,<br><br>I attach objections to the following sites currently proposed as Local Green Spaces to the North of the High Street, Iron Acton.<br><br>o LGSD808 – The Avenue, Iron Acton<br><br>o LGSD809 – Land to the North of Iron Acton Village<br><br>I also attach a Plan submitted to the Council today for the Local Plan Call for Sites. The site shown on the attached (considered as one area for the Call for Sites) comprises both of the two LGSD sites.<br><br>We act on behalf of the landowners, who object to the potential designation.<br><br>I would be grateful if you could please confirm receipt of the attached. If there are any queries, please do not hesitate to contact me. |
| **Attached documents** | North and Letherby Ltd (Mrs. Sara Tucker).pdf (763 KB) |

| | |
|---|---|
| **Respondent Name** | Sara Tucker - North & Letherby Ltd |
| **Comment ID** | 19730785/2066 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG416 |
| **Attached documents** | SG416 Land at West Street Farm, West Street, Tytherington.pdf (1.7 MB) |

| | |
|---|---|
| **Respondent Name** | Sara Tucker - North & Letherby Ltd |
| **Comment ID** | 19730785/2067 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG140 |
| **Attached documents** | SG140 Land at Lower Marlwood Farm, Kington Lane, Thornbury.pdf (1.8 MB) |

| | |
|---|---|
| **Respondent Name** | Sara Tucker - North & Letherby Ltd |
| **Comment ID** | 19730785/2068 |
| **Document Part Name** | Question 20 - Call for Sites |

| | |
|---|---|
| **Comment** | SG242 |
| **Attached documents** | SG242 Land off Perrinpit Road and Bristol Road, Frampton Cotterell.pdf (2.0 MB) |

| | |
|---|---|
| **Respondent Name** | Sara Tucker - North & Letherby Ltd |
| **Comment ID** | 19730785/2069 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG83 |
| **Attached documents** | SG83 Land at Rudgeway, Off Gloucester Road (A38), Rudgeway.pdf (1.7 MB) |

| | |
|---|---|
| **Respondent Name** | Sara Tucker - North & Letherby Ltd |
| **Comment ID** | 19730785/2070 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG279 |
| **Attached documents** | SG279 Land off Westmarsh Lane, Oldbury-on-Severn.pdf (1.6 MB) |

| | |
|---|---|
| **Respondent Name** | Sara Tucker - North & Letherby Ltd |
| **Comment ID** | 19730785/2071 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG89 |
| **Attached documents** | SG89 Land at Hackett House, North of Hackett Lane, Thornbury.pdf (1.6 MB) |

| | |
|---|---|
| **Respondent Name** | Sara Tucker - North & Letherby Ltd |
| **Comment ID** | 19730785/2072 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG79 |
| **Attached documents** | SG79 Land North of High Street, Iron Acton.pdf (1.7 MB) |

| | |
|---|---|
| **Respondent Name** | Sara Tucker - North & Letherby Ltd |
| **Comment ID** | 19730785/2073 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG102 |
| **Attached documents** | SG102 Land at Upper Hazel Farm, Strode Common, Alveston.pdf (1.8 MB) |

| | |
|---|---|
| **Respondent Name** | Sara Tucker - North & Letherby Ltd |
| **Comment ID** | 19730785/2074 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG106 |
| **Attached documents** | SG106 Land South of Forty Acre Lane, Alveston.pdf (1.6 MB) |

| | |
|---|---|
| **Respondent Name** | Sara Tucker - North & Letherby Ltd |
| **Comment ID** | 19730785/2083 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG87 |
| **Attached documents** | SG87 Land at Catherine Hill, Olveston.pdf (1.6 MB) |

| | |
|---|---|
| **Respondent Name** | Sara Tucker - North & Letherby Ltd |
| **Comment ID** | 19730785/2084 |

| | |
|---|---|
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG101 |
| **Attached documents** | SG101 Land at Haw Lane, Olveston.pdf (1.6 MB) |

| | |
|---|---|
| **Respondent Name** | Sara Tucker - North & Letherby Ltd |
| **Comment ID** | 19730785/2085 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG88 |
| **Attached documents** | SG88 Land at Shrubbery Farm, Shortwood Hill, Pucklechurch.pdf (1.6 MB) |

| | |
|---|---|
| **Respondent Name** | James North - North & Letherby Ltd |
| **Comment ID** | 12327873/2086 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG78 |
| **Attached documents** | SG78 Land by Aust Road and Elberton Road, Olveston.pdf (1.6 MB) |

| | |
|---|---|
| **Respondent Name** | Sara Tucker - North & Letherby Ltd |
| **Comment ID** | 19730785/2087 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG90 |
| **Attached documents** | SG90 Land to the Rear of Playing Field, Tockington.pdf (1.6 MB) |

| | |
|---|---|
| **Respondent Name** | Sara Tucker - North & Letherby Ltd |
| **Comment ID** | 19730785/2093 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG91 |
| **Attached documents** | SG91 Land North of Forty Acre Lane, Alveston.pdf (1.5 MB) |

| | |
|---|---|
| **Respondent Name** | Sally Gooding |
| **Comment ID** | 19731905/2094 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG295<br><br>Hi ,<br><br>Thank you for your courtesy call back and follow up email.<br><br>I know you are very busy but the two mention fields I would like your views on.<br><br>Over many years we have had large and small developers, land agents and one retired Planner who find these two fields should be classed as infills they surrounded on three sides by houses and would be just a continuation of the village, which is badly in need of growth. I could understand if it were picturesque sprawling countryside Green Belt land but it is not?<br><br>If ever you have time and would like to meet at Salem Chapel in Watleys End and walk through the two fields It would be so appreciated.<br><br>Many thanks for your time.<br><br>Hi Sally, |

| | |
|---|---|
| | Many thanks – will look out for this.<br><br>Call for Site Admission Plan - Reference SG295<br><br>Hi ,<br><br>Thankyou for your call. I did respond but no answer.<br><br>**To fill you in:**<br><br>I have had the Call for Admission Plan bounced back when sent as single sheets due to the size, I then condensed the file into a compressed zip file that was also bounced back.<br><br>Due to the urgency of Submission (30th of April ) I copied all the relevant Documents and bought down to SG for your attention. **The Forms are in the internal mail, you should receive on Monday, they were sent by your Front of House Administrator so please be aware.**<br><br>**To confirm what is included.**<br><br>An update Call for Site Application Form with the original Application Form, I was informed by that rather than re-submit the exact same details that was on the original Form was to put on the new Form "same as original Document."<br><br>Any additional clarification please email me. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Daniel Millward - Pegasus Group |
| **Comment ID** | 20246977/2104 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG209 |
| **Attached documents** | SG209 Land at Rockhouse Farm, Main Road, Shortwood, Mangotsfield.pdf (3.4 MB) |

| | |
|---|---|
| **Respondent Name** | Daniel Millward - Pegasus Group |
| **Comment ID** | 20246977/2115 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG68 |
| **Attached documents** | SG68 Land at Frog Lane Farm, Coalpit Heath.pdf (60.6 MB) |

| | |
|---|---|
| **Respondent Name** | Daniel Millward - Pegasus Group |
| **Comment ID** | 20246977/2125 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG67 |
| **Attached documents** | SG67 Land at Hortham Lane, Almondsbury and 78 Gloucester Road, Almondsbury.pdf (15.3 MB) |

| | |
|---|---|
| **Respondent Name** | Leslie G. Harper |
| **Comment ID** | 2800225/2126 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG119 |
| **Attached documents** | SG119 Land at Hallenfield, Severn Road, Hallen.pdf (2.3 MB) |

| | |
|---|---|
| **Respondent Name** | Andrew Niblett |
| **Comment ID** | 16420481/2127 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG64 |
| **Attached documents** | SG64 Land Adjacent to The Firs, Crossways Lane, Thornbury.pdf (1.8 MB) |

| | |
|---|---|
| **Respondent Name** | Robyn Nicholl - Barton Willmore |
| **Comment ID** | 16638657/2131 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG107 |
| **Attached documents** | SG107 Land East of Park Lane, Coalpit Heath.pdf (1.8 MB) |

| | |
|---|---|
| **Respondent Name** | Paul Davis - Persimmon Homes Severn Valley |
| **Comment ID** | 3553569/2152 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG112<br><br>Please see the attached Document. |
| **Attached documents** | Persimmon Homes Severn Valley (Mr. Paul Davis).pdf (3.4 MB) |

| | |
|---|---|
| **Respondent Name** | Charlotte Taylor - GVA Grimley Limited |
| **Comment ID** | 11482817/2161 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG442 |
| **Attached documents** | SG442 Land at Jupiter Road, Patchway.pdf (853 KB) |

| | |
|---|---|
| **Respondent Name** | Charlotte Taylor - GVA Grimley Limited |
| **Comment ID** | 11482817/2162 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG40 |
| **Attached documents** | SG40 Land South of Merlin Road, Cribbs Causeway (Also Known as 'Site 20').pdf (1.2 MB) |

| | |
|---|---|
| **Respondent Name** | Hall and Woodhouse |
| **Comment ID** | 16757633/2167 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | **Land at The Griffin**:<br><br>4.20 The Griffin site could deliver approximately 100 dwellings comprising open market housing, affordable and specialist housing for the elderly. The aspirations of the Parish Council include housing for the elderly and this site could deliver this along with other types of residential development. The site could also accommodate small local retail and a community facility to host meetings for local community organisations.<br><br>4.21 Some of the hardstanding is surplus to requirements and is contained by development to the West (existing residential) and North(industrial units) and Webbs Heath Road to the East and therefore does not contribute to the openness of the Green Belt. The redevelopment of surplus previously developed hardstanding land could yield up to 10 dwellings in a small sensitively designed development. The entire 3 ha site could yield up to 100 dwellings.<br><br>4.22 There has been liaison with the Parish Council who would like the site to deliver a local community facility to include a venue for meetings/ gatherings and/or a convenience shop. Making some development value from the site would enable the improvements to be made to the Pub as a vital community facility which could include the provision of space for meetings/gatherings for the local community and local interest groups. There was also interest in the need for accommodation for older people, smaller households and Self-build as well as the provision of additional allotments.<br><br>4.23 The site is available and achievable for development to meet the Parish Council's development aspirations and to provide residential development. There are no known significant abnormal development costs and significant new infrastructure is not required. Subject to obtaining Planning Permission, this site could make an almost immediate contribution to the five year housing supply position in the West of England. |

| | |
|---|---|
| | 4.24 Hall & Woodhouse is committed to the site and surrounding area, and sees the Griffin as a long-term Pub of the future. Redevelopment of the land to the North of The Griffin would not only boost the Pub's trade by introducing potential new customers, but would also generate funds which could be re-invested in the Pub. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Simon Fitton - Alder King Planning Consultants |
| **Comment ID** | 10757761/2174 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG440 |
| **Attached documents** | SG440 Land at Kingrove Farm, Chipping Sodbury.pdf (2.5 MB) |

| | |
|---|---|
| **Respondent Name** | Newland Homes |
| **Comment ID** | 2857441/2175 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG13<br><br>**1.0 INTRODUCTION:**<br><br>1.1 This Consultation Representation has been prepared by DLP Planning Ltd (DLP) on behalf of Newland Homes. These Representations are in response to the South Gloucestershire Council New Local Plan 2018 - 2036 Consultation Document and the associated Evidence Base and supports the promotion of land that Newland Homes have interests in at Land West of Bristol Road, Thornbury.<br><br>1.2 Newland Homes have participated in previous stages of the South Gloucestershire New Local Plan (SGLP) preparation process. Land West of Bristol Road, Thornbury has been put forward by as a suitable location for housing as part of the SGLP Prospectus Consultation which took place from 12th January – 23rd February 2017 and the Call for Sites exercise which took place in 2015 (Site Ref: SG000147).<br><br>1.3 The site is within the Green Belt and adjacent to the Thornbury Settlement Boundary. It is anticipated to be capable of providing up to 50 dwellings.<br><br>1.4 The site has also been promoted through the West of England Joint Spatial Plan (JSP) process and was submitted to the Issues and Options Consultation in January 2016 (Site Ref: SGJSPIO001) and the 'Towards the Emerging Spatial Plan Strategy' Regulation 18 Consultation in November 2016 (Site Ref: SGJSPTESS093).<br><br>1.5 Newland Homes support the Council's approach to the preparation of the SGLP in response to their commitment to plan for the increased levels of growth outlined in the Emerging Joint Spatial Plan (JSP). However, there are a number of issues we believe the Council need to reconsider in order to make the Plan sound, such as the overall housing number, the proposed Housing Distribution Strategy and the use of Green Belt Assessment Stage 2.<br><br>1.6 Newland Homes support the identification of Thornbury as a Strategic Development Location (SDL). However they think it is important that the Council look to allocate sites for non-strategic development in the most sustainable locations so that they are not overreliant on large sites coming forward and that the Strategy proposed is the most sustainable possible.<br><br>1.7 Chapter 3 of this Report sets out Newland Homes' consideration of the overall SGNLP. Newland Homes consider there to be significant questions surrounding the potential Distribution Strategies outlined in the Plan and whether these present the most appropriate locations for growth.<br><br>1.8 Chapter 4 discusses the constraints and opportunities for Land West of Bristol Road, Thornbury in further detail, to illustrate that the site is largely unconstrained by absolute constraints.<br><br>1.9 Chapter 5 looks specifically at Land West of Bristol Road, Thornbury in terms of its contribution to the Green Belt drawing upon the Green Belt Assessment Stages 1 and 2 undertaken for the JSP. Reference is also made to the Summary Landscape and Visual Appraisal and Landscape Strategy produced by Enderby Associates in support of these Representations, which covers the following:<br><br>o The Environmental Planning context of the area;<br><br>o The landscape and visual context of the site;<br><br>o The constraints and opportunities for development of the site;<br><br>o The function of the site in Green Belt terms.<br><br>1.10 Chapter 6 discusses Land West of Bristol Road, Thornbury in further detail to discuss the potential scale of development and how it could appropriately respond to its situation partially within the Thornbury Conservation Area.<br><br>1.11 A Site Location Plan, Constraints Plan and Landscape Plan have both been provided as part of this Submission (see Appendices). |

1.16 As highlighted in the following Sections, Newland Home consider that Land West of Bristol Road is:

o A good option for an exceptional circumstances Green Belt Release. Detailed consideration of the specific Green Belt parcel confirms that the site itself does not contribute or only provides a limited contribution to the defined purposes of Green Belt and its release could re-enforce a stronger permanent boundary and not undermine the contribution of the wider Green Belt Parcel.

o A very sustainable option for non-strategic growth adjacent Thornbury Town Centre and its associated facilities, including retail, educational, employment, community and leisure.

o Located adjacent to a settlement that sits highly within the Authorities overall Settlement Hierarchy and is therefore more suitable for non-strategic growth than other less sustainable locations.

o Capable of providing numerous open space and recreation benefits, including new open space, community orchard and enhancements to existing strategic Public Rights of Way (Jubillee Way).

o Capable of delivery in the short term at an appropriate scale and density to ensure landscape and heritage issues are fully considered.

o A site that is unconstrained in viability terms, ensuring that proposals will provide much needed Affordable Homes and ensure a mixed and balanced development.

**4.0 SITE CONSTRAINTS AND SUSTAINABILITY:**

4.1 The proposed site, outlined in red on the enclosed Site Location Plan (Appendix 1) is located immediately to the West of Bristol Road on the Southern edge of Thornbury. The site extends to an area of approximately 6 hectares. It is within the Green Belt and adjoins the Thornbury Settlement Boundary. The Northern half of the site is within the Thornbury Conservation Area.

4.2 The site largely comprises unmanaged grassland, overgrown hedgerows, mature trees and streamside vegetation. There are streams to the Western part of the site travelling in a North-South direction and along the Western site boundary.

4.3 The site is bounded to the North by Allotments and a small field, with Mundy Playing Fields beyond. To the West of the site on the opposite side of Bristol Road there is a ribbon of detached housing set in generous plots. The Thornbury Industrial Estate and Tesco Superstore are located to the rear of these houses.

4.4 The site is bounded to South by Alveston Hill and a detached house with an area of woodland to the South-West. Thornbury Leisure Centre is also to the South of the site on the Eastern side of Alveston Hill. The site is bounded to the West by Thornbury Golf Course.

4.5 The following parts of this Section looks at the constraints and opportunities associated with Land West of Bristol Road. A Constraints Map is provided in Appendix 2 and in the supporting Summary Landscape and Visual Appraisal and Landscape Strategy submitted with these Representations.

**Constraints and Opportunities:**

4.6 By considering the potential site constraints and opportunities below, we are able to highlight how development in this location would be achieved, The site is affected by the following constraints:

o Located within Green Belt (See Section 5);

o The Western part of the site is located within Flood Zone 3, however the net developable area that falls outside of this level of Flood Risk is approximately 2.5ha;

o The North Eastern, Central and North Western fields of the site lie within the Thornbury Conservation Area, within Area 5 - ‘the open closes’ around the historic town; and

o A public footpath runs along the Western site boundary.

4.7 The site presents the following opportunities:

o The site is very well located to Thornbury Town Centre and services and facilities (discussed further below);

o Leading on from the above Comment, development of the site could help sustain the Thornbury High Street, as is mentioned in the Thornbury Consultation Event Report: Section 2C;

o The site would adjoin the existing built up area;

o The site is capable of delivering housing in the short-term;

o The site is low lying and well-contained by mature vegetation;

o The Western area of the site within the Flood Zone provides opportunities for enhancements to the setting of the stream and the public footpath;

o There is an existing bus stop adjacent to the site's boundary on Bristol Road; and

o The site is unconstrained in viability terms, ensuring that proposals will provide much needed Affordable Homes and ensure a mixed and balanced development.

**The Site and its Contribution to the Green Belt Purposes:**

5.14 Within the JSP Stage 1 Green Belt Assessment produced in 2015, Land West of Bristol Road falls within Cell 10 – South of Thornbury, which extends between Thornbury and Alveston to the South, wrapping around the entire Southern boundary of Thornbury. Cell 10 is described as:

*"Open agricultural land which adjoins the Southern edge of Thornbury. This Green Belt land in this Cell is close to the Town Centre and checks the spread of Thornbury and defines its setting. The centre of Thornbury including the High Street lies within the Conservation Area, as well as land to the South and West of the High Street which adjoins the Green Belt land in this Cell.*

*The Green Belt in this Cell directly serves Purposes 2, 3 and 5."*

5.15 The assessment considers Cell 10 to serve Purpose 2 by preventing Thornbury from merging with the Bristol urban area and maintaining the separation of Thornbury and Alveston. The Thornbury Leisure Centre is the Southernmost development in Thornbury.

The Land West of Bristol Road site lies to the North of the Leisure Centre and immediately opposite the housing on the East side of Bristol Road, the site is also bounded to the South by an existing residential dwelling and Alveston Hill. Therefore development would not result in an extension of development Southwards towards Alveston or Bristol beyond the current Southern extent of the town.

5.16 Therefore, whilst other land within Cell 10 South of Thornbury may contribute to this Purpose, the site, due to its location North of the Southern part of the town, does not.

5.17 With regards to Purpose 3, Cell 10 is considered to safeguard the countryside from encroachment. This can be seen to be true of almost any undeveloped Greenfield site within the countryside and this is reflected by the fact that nearly every Cell in the assessment is assessed as contributing to Purpose 3. The site is very well contained by the Allotments, open space and playing fields to the North; Thornbury's urban edge and Bristol Road to the East; an existing dwelling, Alveston Hill, the Leisure Centre and woodland to the South; and the Golf Course to the West. Apart from the North-Eastern field, the site is bounded by mature vegetation on all sides. The primary issue for Purpose 3 is the perception of encroachment and the visual intrusion that development would represent. In the case of Land West of Bristol Road, the site is very well contained and would not be apparent from wider views. As such, it is believed that the development of the site would only present a limited encroachment into the countryside and would therefore only perform a limited function under this Green Belt Purpose. Please see the accompanying Summary Landscape and Visual Appraisal and Landscape Strategy submitted with these Representations for further assessment of the site.

5.18 With regards to Purpose 5, the overall Green Belt constraint serves the purpose of support urban regeneration. This Purpose can't be used to differentiate Green Belt Cells, as can be seen by the fact that all Cells are assessed as serving Purpose 5.

5.19 As part of the JSP, a Green Belt Assessment Stage 2 was undertaken in 2016. Land West of Bristol Road, Thornbury is contained within Cell 10b and the assessment of this Cell is included overleaf:

Please see the attached Document for the information which is referenced above.

5.20 As noted above and within the supporting Summary Landscape and Visual Impact and Landscape Strategy Document, development of the site would not result in any Southern extension of Thornbury or reduction in the buffer between Thornbury and Alveston. The site is not located on the A38 Corridor and is largely screened from the approach to Thornbury. Therefore the site does not contribute to Purpose 2.

5.21 Green Belt analysis of the site has demonstrated that all of the site, apart from the North-Eastern field, is contained and visually separate from the Green Belt to the North and West. Again, with regards to Purpose 3, almost any area of undeveloped countryside within the Green Belt can be said to contribute to Green Belt Purpose 3 in at least a limited way. It is considered that the site is well contained, well screened and would not be visually apparent from wider views, as such it performs a limited function with regard to restricting encroachment on the countryside. The site only provides a limited contribution to Purpose 3 and could be released from the Green Belt without detriment or harm to the function of the Green Belt or to the rest of Cell 10b.

5.22 The size and location of the wider Submission of Land West of Bristol Road, Thornbury (covered in the following Sections) is sufficient to make an important local contribution to the required housing provision of around 50 new homes (depending on the detailed master-planning). In terms of developability and deliverability there are also no known constraints which would prevent this site from being delivered within the next five to ten-years.

5.23 In summary, the site is located within a parcel of the Green Belt which is well defined and enclosed by several significant physical barriers which detaches it from the wider countryside. In terms of the Purposes of Green Belt it is considered by Newland Homes and backed up by the JSP Green Belt Review and this evidence that the site does not form a significant part of the Green Belt compared to other areas being considered for non-strategic level growth. As a location performing limited function in a very sustainable location, the site must be worthy of very careful consideration by the Council.

**6.0 POTENTIAL DEVELOPMENT DESIGN:**

6.1 Land West of Bristol Road, Thornbury covers an area of approximately 6 hectares and has the potential to deliver a residential development that responds positively to the site's constraints and opportunities outlined in Section 4. The following Chapter includes outline information on the site if it were to come forward for residential development.

6.2 Development on the site would be largely restricted to the more contained Southern and central parts of the Eastern side of the site. The site has the potential to provide around 50 dwellings (subject to detailed master-planning) the vast majority of which would be located in the South Eastern field. A small number of one and a half storey houses is suggested in the South Eastern corner of the North Eastern field which is within the

| | |
|---|---|
| | Conservation Area. These could be set down below the road and out of the direct view from the Southern end of the High Street. The rationale for development in this part of the Northern field is to provide natural surveillance to the open space/community orchard provision and enable a direct pedestrian Right of Way from the development to the Southern end of Thornbury High Street.<br><br>**Green Infrastructure, Landscape, Ecology & Biodiversity:**<br><br>6.3 Landscape context and green infrastructure is discussed in more detail in the supporting Summary Landscape and Visual Appraisal and Landscape Strategy. The indicative Development Strategy in terms of potential enhancement to green infrastructure contained within Paragraph 5.4 of that Report and is summarised below:<br><br>o New tree planting on the Western, Nrthern and Southern edges of the development to increase long term screening.<br><br>o Reinforcement and infilling of the hedge on the Eastern edge of the site and replacement of Elm, which has a limited life expectancy, with other locally occurring hedgerow species.<br><br>o Mature trees within the site managed and supplemented with new tree and shrub planting to ensure long term survival in keeping with the local Landscape Character Assessment Strategy.<br><br>o Flood Zone on the Eastern side of the site enhanced with wetland scrapes and native wet grassland to increase Biodiversity.<br><br>o Existing Jubilee Way long distance footpath retained within a Green Corridor and screened from development by existing and new planting. Additional footpaths and boardwalks provided in the wetland area and linking with the proposed development; potential to improve the footpath by providing a more durable all weather surface to enhance connectivity between the leisure centre and open space/playing fields.<br><br>o Community orchard planted in the North Eastern field maintaining some openness with the rest of the Conservation Area to the North in keeping with the local Landscape Character Assessment Strategy.<br><br>o Provision for flood attenuation in the lower central parts of the site close to the stream (outside the Flood Zone).<br><br>o A footpath link between the site and the Jubilee Way to the High Street in the North Eastern corner of the site.<br><br>6.4 In terms of ownership, Newland Homes benefit from a signed Option to acquire the site, ensuring a flexible approach. The land is considered available for development and deliverable within the next five years. |
| **Attached documents** | SGC_NLP_Feb 2018_Consultation Doc Representations_A5097P_Land West of Bristol Road Thornbury_Newland Homes.pdf (1.4 MB)<br>Bristol Rd Thornbury_Summary Landscape Appraisal-Final_Issue 270418.pdf (5.3 MB) |

| | |
|---|---|
| **Respondent Name** | Kate Holden - Pegasus Group |
| **Comment ID** | 17732513/2182 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG92 |
| **Attached documents** | SG92 Land North of Wotton Road, Charfield.pdf (1.2 MB) |

| | |
|---|---|
| **Respondent Name** | David Jones - Evans Jones Ltd |
| **Comment ID** | 19732033/2183 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG230 |
| **Attached documents** | SG230 Land to the South East of Townsend Lane and West of The Sundays, Lower Almondsbury.pdf (1.2 MB) |

| | |
|---|---|
| **Respondent Name** | Laura Wall - Acorus Rural Property Services Ltd |
| **Comment ID** | 14389633/2184 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG169 |
| **Attached documents** | SG169 Land at Rowley Fields, Watery Lane, Yate.pdf (1.1 MB) |

| | |
|---|---|
| **Respondent Name** | Veronica Barbaro - GVA |
| **Comment ID** | 14479585/2185 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG422 |

| | |
|---|---|
| **Attached documents** | SG422 Land at North Avon Magistrates Court, Kennedy Way, Yate.pdf (503 KB) |

| | |
|---|---|
| **Respondent Name** | Peter Roberts - Barton Willmore |
| **Comment ID** | 3557665/2186 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG1 |
| **Attached documents** | SG1 Land at Crossways, Thornbury.pdf (2.7 MB) |

| | |
|---|---|
| **Respondent Name** | Will Collins - Rackham Planning |
| **Comment ID** | 16416225/2190 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG178 |
| **Attached documents** | SG178 Land at Glenfrome, Beacon Lane, Winterbourne.pdf (975 KB) |

| | |
|---|---|
| **Respondent Name** | Karl Scholz - Alder King Planning Consultants |
| **Comment ID** | 3788481/2197 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG104 |
| **Attached documents** | SG104 Land at Bromley Heath Road, Bromley Heath.pdf (14.6 MB) |

| | |
|---|---|
| **Respondent Name** | Spitfire Bespoke Homes Ltd |
| **Comment ID** | 19738689/2202 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG437<br><br>**Proposal:**<br><br>A Vision Document and Illustrative Masterplan (Appendix 2) have been prepared to accompany this Representation demonstrating the capabilities of the site in further detail. It highlights how the site is capable of accommodating around 75 dwellings in a landscape led scheme which could offer a range of house types from affordable starter to larger family homes – directly serving local needs. The development layout will draw key influences in terms of scale, massing and external appearance from the local area and its wider rural setting. Overall, the proposal will represent a logical extension to the village which is within walking distance of the village centre and its key services and facilities.<br><br>**Status of the Land:**<br><br>The National Planning Policy Framework states that for sites to be considered 'deliverable' means they will be available now, in a suitable location now and achievable within five years and viable, as per Footnote 11 of Paragraph 47.<br><br>*Suitable:*<br><br>The site is suitably and sustainably located for development with good accessibility to local services, as identified in the above section of this Document. There are no physical constraints that would prevent or delay development coming forward on the developable area of the site.<br><br>The wider area surrounding the site to the North and West is made up of existing residential development (both large detached and terraced properties in a range of architectural styles) and as such, the site is clearly located in a sustainable location suitable for residential development given the surrounding compatible land uses.<br><br>*Available:*<br><br>There are no legal or ownership problems to preclude delivery well within the future Plan Period, or earlier. The site is within the control of Spitfire Bespoke Homes Ltd and there is confidence within the Housing Market which will ensure its timely delivery. The site is available immediately with delivery of all units within 5 years. The site is therefore available.<br><br>*Achievable:*<br><br>Spitfire wish to support the site to be allocated for housing in the Emerging Plan Period. The land in question is a Greenfield site and has no physical constraints thus contributing to its timely delivery. |

| | |
|---|---|
| | This site is in a location that developers find attractive to bring forward housing sites for development, as set out in the accompanying Vision Document. Residential development represents a viable future use for the site which can be delivered quickly. As such, development of the site can be considered achievable.<br><br>Overall, Land off the Bristol Road, Winterbourne is considered to be suitable, available and achievable for future residential development. Therefore, the suggested allocation of the site for housing is entirely justified, effective and compliant with national Planning Policy. The site is therefore considered to be a 'deliverable' housing site in the context of the NPPF. There is no reason why the site could not be delivered during the Plan Period.<br><br>Overall, the site is available, deliverable and achievable and is proposed for future development as part of the new Development Plan for South Gloucestershire. |
| **Attached documents** | Spitfire Bespoke Homes Ltd - Hunter Page Planning (Guy Wakefield).pdf (5.6 MB) |

| | |
|---|---|
| **Respondent Name** | Guy Wakefield - Hunter Page Planning |
| **Comment ID** | 7283809/2203 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG437 |
| **Attached documents** | SG437 Land to the North of the Railway Line, Winterbourne.pdf (6.3 MB) |

| | |
|---|---|
| **Respondent Name** | Peter Rawlinson - Gleeson Strategic Land Limited |
| **Comment ID** | 19328353/2204 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG246 |
| **Attached documents** | SG246 Land at Pitt Farm, Marshfield.pdf (26.6 MB) |

| | |
|---|---|
| **Respondent Name** | Simon Fitton - Alder King Planning Consultants |
| **Comment ID** | 10757761/2211 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG47 |
| **Attached documents** | SG47 Land to the Rear of Park Farm, Barry Road, Oldland Common.pdf (1.9 MB) |

| | |
|---|---|
| **Respondent Name** | Mark Godson - SF Planning |
| **Comment ID** | 12328161/2214 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG171 |
| **Attached documents** | SG171 Land to the East of Kings Square, Bitton.pdf (1.2 MB) |

| | |
|---|---|
| **Respondent Name** | Philip Staddon - PJS Development Solutions Ltd |
| **Comment ID** | 10583777/2215 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG213 |
| **Attached documents** | SG213 Land at Severn Road, Severn Beach.pdf (2.3 MB) |

| | |
|---|---|
| **Respondent Name** | Tristan Dewhurst - Lichfields |
| **Comment ID** | 17353473/2225 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG113 |
| **Attached documents** | SG113 Land to the South of Charfield.pdf (15.1 MB) |

| | |
|---|---|
| **Respondent Name** | John Phillips - Phillips Planning and Development |
| **Comment ID** | 318177/2227 |

| | |
|---|---|
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG163<br><br>Part 2 - Call for Sites - Land to the Rear of Burma House and Bella Vista, Westerleigh:<br><br>The site shown edged red on Plans 1A and 1B (at Appendix 1), measures approximately 2.02h in total, being located close to the heart of Westerleigh Village and surrounded on all sides by defensible long term boundaries, represents in our view, the most logical and appropriate opportunity to provide much needed housing within the village which has not experienced any significant new housing (other than very small infill sites) since the 1960's. An aerial photograph clearly identifies the site (edged red) and its relationship to the village is attached at Appendix 2 to assist understanding of the site.<br><br>The site is owned by Burma House and Bella Vista, Westerleigh Road, and both parties have for a considerable period of time (since ) joined forces to jointly promote the site for future housing. This is still the case and we act jointly on behalf of both parties who have further instructed this Submission to promote their land holdings to South Gloucestershire Council.<br><br>New site access from Westerleigh Road is readily available along the joint frontage which would require the demolition of one or both properties and a highway evaluation has determined that satisfactory access can be achieved in accordance with accepted national highway criteria and the technical highway requirements of South Gloucestershire Council.<br><br>The site is readily available with utilities having recently been upgraded including electricity (Western Power Distribution) and foul sewerage/ water supply (Wessex Water) which could readily accommodate a housing development of up to 50 dwellings.<br><br>Plans showing the locations of the new service infrastructure provision are shown at Appendix 3.<br><br>Background:<br><br>Historically, the land was included within the Westerleigh Village boundary up until the mid 1980's and was identified for housing in the Village Concept Plan in the 1960's as it was always intended that this remaining area would form the final phase of development to round off the village envelope.<br><br>The site was however deleted from the village boundary as part of the former Avon County Council Green Belt Boundary Review of the 1970's/ 1980's and included within the surrounding Green Belt. The last time that the designation of this site was considered under the Development Plan process was as part of the then North Avon District Council's Rural Areas Local Plan in 1991. In his consideration of the Deposit Plan, the Inspector at that time stated:<br><br>*"I accept that, if any extension of this village were to be contemplated, this site would have certain claims for favourable consideration."*<br><br>Since then, the site has remained outside but adjacent to the built edge of the village boundary and within the Green Belt.<br><br>As noted, the site has subsequently been promoted at the various stages in the ongoing South Gloucestershire Core Strategy process and most recently in response to the JSP.<br><br>A previous exercise undertaken by South Gloucestershire Council at the request of Westerleigh Parish Council back in 2014 assessed 11 potential sites at Westerleigh based upon their suitability, sustainability criteria, constraints to development and genuine availability. Of the 11 sites assessed, our Client's land at Westerleigh Road (Site 9) was one of two primary sites considered appropriate for future housing development. The other was Jorrock's Industrial Estate (Site 4). We include the findings of the Council's earlier Report as Appendix 4.<br><br>In respect of the Jorrock's Land (on the Eastern side of Westerleigh Road), the Council had concerns over possible land contamination, transport/ access safety and loss of employment together with the impact upon Brook Farmhouse which is Grade 2 Listed. Access was also sited as a concern to future development. In addition, it is understood that there are difficult underlying hard rock strata relatively close to the surface which could make development very difficult and expensive.<br><br>In respect of the Burma House/Bella Vista land (Site 9), the Council concluded that this site would provide an opportunity to "infill rather than extend the village" and that the development of this site would "not unacceptably harm the openness of the Green Belt or unacceptably harm the 5 Purposes of the Green Belt."<br><br>The site was acknowledged as available for development but noted lack of access a major issue. As has already been stated both landowners are prepared for the demolition of one or both frontage properties if required for access. Therefore, there is no physical constraint to future site access.<br><br>The Site - A Detailed Analysis: |

The site is roughly square in shape and is surrounded on all four sides by built and natural defensible boundaries. The South of the site is bounded by adjoining 1960's residential development at Mill Lane/Newman Close and to the East by properties fronting Westerleigh Road (See Plans 1A and 1B).

To the North, the site is bordered by the former Broad Lane which links Westerleigh with the railway crossing. Broad Lane (now a Rupp and converted into a walkway and cycle track (Photograph 1, Appendix 5)). It has been confirmed by South Gloucestershire Council that this is an Adopted Highway and provides a defensible permanent boundary (Photograph 2, Appendix 5), with a stone wall and mature tree and hedge boundary along its entire length and marks a zone of transition to a more dispersed and sporadic form of housing to the North of the site towards yate. This section of cycleway is part of the "Sustrans" cycle path network and will link Westerleigh with Yate.

The entire Western site boundary is formed by the single-track freight rail line which runs in a North/South direction. The railway line has a mature hedge and tree boundary on either side of the track. The line is used twice a day for freight tankers to the Murco Petrol Refinery terminating to the South of Westerleigh running at very low speeds (less than 10mph) along this section of track.

The site is relatively flat throughout and does not have any intrinsic agricultural or ecological value having close cropped grass throughout and has been within the private curtilages of Burma House and Bella Vista located on Westerleigh Road. There is a slight fall in levels from the Westerleigh Road frontage of between 3 and 4 metres which would assist with the natural drainage of the site together with a satisfactory fall in the underground sewers to the main pipeline running North/South at the far Western end of the site parallel to the railway line.

More recently, the power line which crosses the site has been upgraded to 11Kv by Western Power Distribution (WPD) as shown on the WPD Plan attached at Appendix 3. As part of a village upgrade for electricity supply WPD have confirmed that the new cabling will more than adequately provide power provision for the development of this site (of up to 50 dwellings), without the need for a future house builder to provide this very expensive upgrade which in terms of cost alone could make the land uneconomic to develop.

There will be upgraded sewer works as required by Wessex Water should development take place on the site in the future. We understand having recently spoken with Wessex Water that the village sewerage system is due to be upgraded to relieve the existing backing up problems experienced in the system which is partly as a result from the discharge from the abbatoir to the South of the village. There is the possibility of increasing flow by increasing the existing 150mm pipes to 225mm and straightening out certain right-angle bends as noted within the system where the sewers are located close to the railway line which currently restricts flow leading to back up problems and noxious smells at certain times within the village.

A number of high pressure water main valves situated immediately North of the site could provide the necessary water connection to the site without any highways disruption. Infrastructure provision is shown on the Plan attached at Appendix 3A.

One of the key issues which faces the village is the amount of fast and heavy traffic passing (including commuter traffic) travelling North/South from Yate to Emersons Green and the Business Parks on the North Fringe of Bristol. Indeed, there is also traffic travelling in the opposite direction to Business Parks in yate. In addition, the new Council Offices in Yate have resulted in additional commuter traffic passing through Westerleigh as identified by an earlier Atkins Report commissioned by the Council. Certain traffic calming measures have subsequently been introduced towards the Southern end of the village but there remains a problem of speeding traffic towards the North of the village particularly by those vehicles entering from the North despite clear 30mph speed restrictions along with the weight restrictions on the bridge on Westerleigh Road.

The possible future development of this land would require a new site access from Westerleigh Road located within the site frontage of the two properties and not requiring any third-party land. This would have a major benefit to the village providing a very obvious means of traffic calming towards the Northern part of the village. Initial schematic appraisal of the proposed new Junction to the site has been undertaken to show that this can be achieved within the land holding providing both traffic calming and a new road to serve future housing and within the technical requirements for a sufficient new carriageway width and footpath to a new development leading from Westerleigh Road and meeting accepted visibility sight line standards in both directions for this 30mph stretch of road through the village.

By way of information we attach at Appendix 6 an Indicative Site Plan which was previously tabled at a Public Inquiry held in the 1980's. This shows how the site could have been developed at the time to provide 27 four and five-bedroom houses from a single access albeit requiring a sliver of third-party land to provide sufficient visibility splay and requiring the demolition of Bella Vista. Clearly a new scheme (under current day standards) would need to show a higher density development and to include an appropriate level of Affordable Housing. The Plan is therefore only intended as an illustration of the site development potential and any new scheme would be accessed from the frontage length of Burma House one or either of which may be required to be demolished to enable site access from Westerleigh Road. Both owners are fully aware of this situation and are prepared for demolition of one or either if required so therefore there is no constraint on future site access.

<u>The Planning Case and Sustainability:</u>

We acknowledge from the EIP Inspector's Report (November 2013) that in terms of general sustainability principles, the vast majority of new housing development for South Gloucestershire throughout the remaining Plan Period will be concentrated within the urban areas primarily at Filton Airfield, Emersons Green, Cribbs Causeway, and Thornbury. Nevertheless, whilst the Inspector did not support significant new housing development within the rural areas, he made it clear that it was down to individual Parish Councils (through the Localism Act) to put forward certain sites in areas where there is an acknowledged need and to support the economic wellbeing of rural communities.

We are aware in general terms that Westerleigh Parish Council has acknowledged the need for some additional housing at Westerleigh to support declining community facilities and assist in economic regeneration of the village. The only way in which this can reasonably take place is by providing a level of new housing commensurate in size with the village needs and able to positively contribute to the economic fabric of Westerleigh. Clearly it is for the Parish Council to address this issue through ongoing Consultation with South Gloucestershire Council and particularly as part of the new Local Plan process.

It should also be noted that the completion of this final section of the "Sustrans" cycle track from Westerleigh to Yate significantly increases the sustainability credentials of this land whereby access to local employment areas at Yate and any future employment land associated with the Southern expansion of Coalpit Heath (as mentioned in the latest version of the Focus newspaper April 2018), are all within very easy access of Westerleigh in addition to the existing local bus routes through the village thereby reducing the need to travel to work by private car.

We have suggested the viability of this site to the Parish Council on a number of counts namely:

1. The site forms the most logical extension to the village if housing development is needed. It is close to the heart of the village an can be developed without the need for major new infrastructure to service the site as already stated. It must be remembered that it was previously considered appropriate for development back in the 1960's as part of a Village Concept Plan and the only reason for its continuing sterilisation is the former Avon County Green Belt Plan of the 1970's/1980's. The site has therefore not been re-examined in its Green Belt function for at least 30 years.

2. We have reappraised the function of the site's inclusion within the Green Belt and have come to the conclusion that the site:

a. Forms no significant Green Belt function under the five key criteria of Planning Policy Guidance Note 2 (PPG2) - Green Belt - now updated but largely unchanged by the National Planning Policy Framework Guidance.

b. Remains a continuing anomaly to the village boundary in Westerleigh.

c. Is situated in the most sustainable location in respect of Westerleigh and can be developed without the need to upgrade utilities infrastructure immediately adjacent to the site.

d. Presents a natural "rounding off" to the Settlement Boundary with clearly definable long term defensible boundaries being located close to the heart of the village and village facilities.

e. Can offer real community benefits to the village community as part of a proposed new housing development.

Summary and Conclusions:

We therefore again put forward the site for consideration based upon the following criteria:

o We contend that the land at Westerleigh Road which is contained by existing housing on two sides, a railway line to the West and an Adopted Highway to the North should be considered as an appropriate case for future release from the Green Belt for housing as has been demonstrated is located within a sustainable location.

o The land does not in our opinion comply with any of the five key criteria for defining Green Belt land and its continuing retention as such. We also contend that the land does not add any value to the character of the surrounding Green Belt countryside.

o Historically the site was always intended to form the final phase of development which would sensibly round off this part of the village and was identified as such within the original Village Concept Plan in the 1960's and again at the time of the 1985 Public Inquiry. We contend that this would still represent the most logical extension to the village development boundary should the principle of new housing development be accepted at Westerleigh.

o We genuinely believe that the proposal would bring major benefits to the village economy breathing new vitality into the settlement in terms of the provision of new much needed facilities and potential highway improvements.

o The proposal has been demonstrated to be of great benefit in this sustainable location. Employment exists within both walking and cycling distance or indeed a short Public Transport ride away thereby substantially reducing the need for out commuting by private car one of the key criteria in examining any new proposal.

o We have demonstrated that the site has long term defensible boundaries but that it does not accord with the true Green Belt criteria in terms of its role in the physical separation of Westerleigh from its neighbours either in its physical terms or in the wider countryside and landscape terms. We therefore contend that this sustainable location is ideally suited to future development without causing any demonstrable harm to the character of the village or compromising the wider countryside and surrounding Green Belt land.

o Finally. we contend that this particular site location at Westerleigh must be considered to fully accord with the criteria set out to examine the 35 Rural Settlements now being considered at this time by South Gloucestershire Council. The site is readily available and unconstrained with the necessary infrastructure already in place and its release from the Green Belt is considered acceptable under the terms previously applied by South Gloucestershire Council in consideration of the various sites put forward at Westerleigh. The site can genuinely come forward for residential development within the very early part of the new Local Plan Period having no ownership, infrastructure, or technical constraints, enabling early site development for up to 50 houses.

| | |
|---|---|
| **Attached documents** | Phillips Planning and Development (John Phillips).pdf (6.6 MB) |

| | |
|---|---|
| **Respondent Name** | John Phillips - PPDL - Phillips Planning and Development |
| **Comment ID** | 20346145/2228 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG163 |
| **Attached documents** | SG163 Land to Rear of Burma House and Bella Vista, Westerleigh Road, Westerleigh.pdf (3.7 MB) |

| | |
|---|---|
| **Respondent Name** | John Phillips - Phillips Planning and Development |
| **Comment ID** | 318177/2229 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG458 |
| **Attached documents** | SG458 Land R-O Beaufort Hunt PH, Broad Street, Chipping Sodbury.pdf (2.1 MB) |

| | |
|---|---|
| **Respondent Name** | Mathew Pearson - Pegasus Group |
| **Comment ID** | 20346369/2230 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG438 |
| **Attached documents** | SG438 Land at Iron Acton, Near Bristol Road (B4058).pdf (3.0 MB) |

| | |
|---|---|
| **Respondent Name** | Jackie Lloyd/ Ian Lloyd - Greyskies Ltd |
| **Comment ID** | 19757185/2231 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG463 |
| **Attached documents** | SG463 Land on the West Side of Churchend Lane, Charfield.pdf (1.2 MB) |

| | |
|---|---|
| **Respondent Name** | Paul Carnell - Strutt and Parker |
| **Comment ID** | 14184257/2232 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG347 |
| **Attached documents** | SG347 Land at Lyde Green Farm, Emersons Green.pdf (1.8 MB) |

| | |
|---|---|
| **Respondent Name** | Paul Carnell - Strutt and Parker |
| **Comment ID** | 14184257/2233 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG459 |
| **Attached documents** | SG459 Land to the East of Lyde Green Road, Emersons Green.pdf (776 KB) |

| | |
|---|---|
| **Respondent Name** | Felicity Tozer - Savills |
| **Comment ID** | 16648065/2234 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG52 |
| **Attached documents** | SG52 Land West of Park Farm, Thornbury.pdf (1.7 MB) |

| | |
|---|---|
| **Respondent Name** | Christopher Hall |
| **Comment ID** | 12508673/2235 |
| **Document Part Name** | Question 20 - Call for Sites |

| | |
|---|---|
| **Comment** | SG340 |
| **Attached documents** | SG340 Land at Cattybrook Road, Shortwood.pdf (2.5 MB) |

| | |
|---|---|
| **Respondent Name** | Christopher Hall |
| **Comment ID** | 12508673/2236 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG342 |
| **Attached documents** | SG342 Land at Rock House Farm, Shortwood.pdf (2.5 MB) |

| | |
|---|---|
| **Respondent Name** | Christopher Hall |
| **Comment ID** | 12508673/2237 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG343 |
| **Attached documents** | SG343 Land at Rock House Farm, Shortwood.pdf (2.5 MB) |

| | |
|---|---|
| **Respondent Name** | Christopher Hall |
| **Comment ID** | 12508673/2238 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG344 |
| **Attached documents** | SG344 Land at Rock House Farm, Shortwood.pdf (2.2 MB) |

| | |
|---|---|
| **Respondent Name** | Oliver Shirley |
| **Comment ID** | 19758945/2239 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG204 |
| **Attached documents** | SG204 Land off Tanners Lane, Marshfield.pdf (686 KB) |

| | |
|---|---|
| **Respondent Name** | Hilary Griffiths, John Griffiths, and Alison Yeend |
| **Comment ID** | 19759073/2240 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG346 |
| **Attached documents** | SG346 Land Lying to the South of Shortwood Hill, Mangotsfield.pdf (1.6 MB) |

| | |
|---|---|
| **Respondent Name** | David Shipp - Chipping Sodbury Town Trust |
| **Comment ID** | 3248385/2241 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG108 |
| **Attached documents** | SG108 Land at The Ridings, Chipping Sodbury.pdf (2.3 MB) |

| | |
|---|---|
| **Respondent Name** | Allan Didcott and Gail Didcott |
| **Comment ID** | 12503937/2242 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG315 |
| **Attached documents** | SG315 Land off Station Road, Iron Acton.pdf (816 KB) |

| | |
|---|---|
| **Respondent Name** | Derrick Hardwick |
| **Comment ID** | 10195137/2243 |

| | |
|---|---|
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG281 |
| **Attached documents** | SG281 Land at Washingpool Farm, Easter Compton.pdf (1.7 MB) |

| | |
|---|---|
| **Respondent Name** | Brian Jones |
| **Comment ID** | 19311073/2244 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG457 |
| **Attached documents** | SG457 Land at Harts Cottage, Gloucester Road, Almondsbury.pdf (1.9 MB) |

| | |
|---|---|
| **Respondent Name** | Sally Gooding |
| **Comment ID** | 19731905/2245 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG295 |
| **Attached documents** | SG295 Land at Cloisters Road, Winterbourne.pdf (3.5 MB) |

| | |
|---|---|
| **Respondent Name** | Marcia Darby |
| **Comment ID** | 12140097/2246 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG285 |
| **Attached documents** | SG285 Land at 131 London Road, Bridgeyate.pdf (1.8 MB) |

| | |
|---|---|
| **Respondent Name** | Richard and Karen Warwick |
| **Comment ID** | 10798177/2247 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG455 |
| **Attached documents** | SG455 Land at Rockland, Dodmore Crossing, Westerleigh.pdf (1.9 MB) |

| | |
|---|---|
| **Respondent Name** | Leigh-Ann Jones - Caleva Land Ltd |
| **Comment ID** | 11723201/2248 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG330 |
| **Attached documents** | SG330 Land at Over Lane, Almondsbury.pdf (2.3 MB) |

| | |
|---|---|
| **Respondent Name** | Philip Staddon - PJS Development Solutions Ltd |
| **Comment ID** | 10583777/2250 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG122 |
| **Attached documents** | SG122 Land at Glebe Land, West of A38, Falfield.pdf (3.5 MB) |

| | |
|---|---|
| **Respondent Name** | Mr. Ranald and Mrs. Marie Crook |
| **Comment ID** | 19741889/2251 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG235 |
| **Attached documents** | SG235 Land at Bennett's Barn, High Street, Tormarton.pdf (3.1 MB) |

| | |
|---|---|
| **Respondent Name** | Charles Brian Buckley |

| | |
|---|---|
| **Comment ID** | 19741825/2252 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG292 |
| **Attached documents** | SG292 Land at Alveston Road, Old Down.pdf (2.6 MB) |

| | |
|---|---|
| **Respondent Name** | T. E. Pyper - Aust Parish Council |
| **Comment ID** | 3190177/2253 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG248 |
| **Attached documents** | SG248 Land at Greenacres.pdf (1.3 MB) |

| | |
|---|---|
| **Respondent Name** | Tom Pullin - Voyce Pullin |
| **Comment ID** | 8199073/2254 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG310 |
| **Attached documents** | SG310 Land at Holly Hill Farm.pdf (669 KB) |

| | |
|---|---|
| **Respondent Name** | Alan Arthur Morgan & Karen Louise Haley |
| **Comment ID** | 19753569/2255 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG454 |
| **Attached documents** | SG454 Land Adjoining 294 Badminton Road, Coalpit Heath.pdf (2.7 MB) |

| | |
|---|---|
| **Respondent Name** | Susan Purchase |
| **Comment ID** | 2804385/2256 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG116 |
| **Attached documents** | SG116 Land West of Carsons Road, Mangotsfield.pdf (842 KB) |

| | |
|---|---|
| **Respondent Name** | Chris Dance - LPC (Trull) Ltd |
| **Comment ID** | 2880545/2257 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG150 |
| **Attached documents** | SG150 Land at Jarrocks Estate, Westerleigh Road, Westerleigh.pdf (1.2 MB) |

| | |
|---|---|
| **Respondent Name** | Chris Dance - LPC (Trull) Ltd |
| **Comment ID** | 2880545/2258 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG305 |
| **Attached documents** | SG305 Land at Dyers Lane, Iron Acton.pdf (858 KB) |

| | |
|---|---|
| **Respondent Name** | Chris Dance - LPC (Trull) Ltd |
| **Comment ID** | 2880545/2259 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG299 |
| **Attached documents** | SG299 Land off Goose Green, Siston Hill.pdf (926 KB) |

| | |
|---|---|
| **Respondent Name** | Chris Dadds - JLL |
| **Comment ID** | 16621569/2260 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG298 |
| **Attached documents** | SG298 Land North of Siston Hill.pdf (878 KB) |

| | |
|---|---|
| **Respondent Name** | Mark Roper - T. Roper & Partners |
| **Comment ID** | 19467489/2261 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG452 |
| **Attached documents** | SG452 Land at Lower Woodhouse Farm, Fernhill, Almondsbury.pdf (856 KB) |

| | |
|---|---|
| **Respondent Name** | Haydn Jones - FCF Investments |
| **Comment ID** | 19741633/2262 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG450 |
| **Attached documents** | SG450 Land Adjacent to A38, Alveston.pdf (849 KB) |

| | |
|---|---|
| **Respondent Name** | Chris Dance - LPC (Trull) Ltd |
| **Comment ID** | 2880545/2263 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG174 |
| **Attached documents** | SG174 Land at Old Hundred House, Acton Turville Road, Tormarton.pdf (1.3 MB) |

| | |
|---|---|
| **Respondent Name** | The Owner/Occupier |
| **Comment ID** | 19741249/2264 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | CALL FOR SITES<br><br>WEBBS HEATH:<br><br>Dear Sir,<br><br>We strongly oppose the building on Green Belt at Webbs Heath. We have Rabbits, Deer, Moles, Butterflies to name but a few. This area is a corridor to Warmley Forest Park for all these animals and we have rare wild flowers. This area has footpaths used all the time for dog walking, ramblers and exercising. A recent TV reported the 3 fold increase of Hay and Straw. These fields should be used for this purpose. NOT CONCRETED over. We have local stables and farms that have Horse Riding facilities. People should be allowed to enjoy their hobby on the local roads. We do not have the roads and do NOT want them increased by hundreds of vehicles to and from housing development. WHERE WILL THE RAIN GO: FLOODING. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | John Culverwell |
| **Comment ID** | 19741153/2265 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | **Comments on South Gloucestershire Local Plan – Consultation Document (Feb 2018)**<br><br>Comments herein relate to sites + shown in the SGC Online Document and the associated Document " Representations to the West of England Joint Spatial Plan dated 19th December 2016."<br><br>(herein after referred to simply as ) Submission for these sites is disingenuous and inaccurate in content and context. |

COMMENTS AS FOLLOWS:

1. Comments on Procedural Non-compliance:

a. When submitting the proposal, have not followed the declared SGC Submission process.

Page 1 Paragraph 1 of "The SGC New Local Plan Site Submission Form" clearly states *"For each site please complete a separate Form and provide a Map that clearly and accurately identifies the site boundary."*

have used a single Submission Form but, the Submission covers two separate sites and as such does not comply with SGC explicit instructions in the Submission Form.

**Comment/Objection:**

**The effect of submitting a single proposal by is an attempt to inextricably link the potential development future of two separate sites when in fact each development site should be considered on the individual benefits and detriments to the local community and compliance with local Development Strategies.**

**Furthermore, it is believed that proposal is made on behalf of the owner of one of the sites in an attempt to speculatively entice the owner of the other site to sell.**

2. Comments on Details Contained in the "Site Submission Form" as Submitted by :

a. Page 2 of The SGC New Local Plan Site Submission Form clearly states "*If acting on behalf of Landowner/developer please provide Client name and address details:"*

**Comment/Objection:**

**have simply entered "Land Owners" without providing the required details.**

b. On Page 2 of "Site Submission Form" have advised that they represent a Client who is sole owner of the site.

**Comment/Objection:**

**It is believed that the two sites are not under sole ownership and are legally representing only the owner of one of the two sites.**

c. Page 2 of The SGC New Local Plan Site Submission Form clearly states "Does the owner (or other owner(s)) support your proposals for the site?"

In response to this Question have indicated that they have the owner's support.

**Comment/Objection:**

**In December 2017, the owner of one of the sites publicly stated "In summary - Just to be clear, the will aim to keep as many options open as possible, and that would appear to be out of the green space. That doesn't mean you will see cricket or tennis moving anywhere else in the next 20 years……"**

3. Comments on Details Contained in Section 5 (Site Suitability Issues) of the "Site Submission Form" as Submitted by :

a. Does the site have any physical constraints (e.g. topography, access, severe slope, vegetation cover etc)?

Response: "No."

**Comment/Objection:**

**Response is misleading. Due to physical location, both sites will not afford safe and secure vehicular and pedestrian access without significant and costly modifications to both public highways and footpaths.**

b. Is the site subject to flooding?

Response “No.”

**Comment/Objection:**

**Although not located on a designated Flood Plain, one of the sites is subject to severe waterlogging at times due to extended/severe wet weather, groundwater springs and subterranean streams.**

c. Is the site affected by ‘bad neighbour’ uses (e.g. power lines, railway lines, major highways, heavy industry)?

Response: “No.”

**Comment/Objection:**

**The sites are located on opposite sides of a section of the A4174 that is Dual Carriageway with national speed limit.**

**The proposed sites would place residential development between existing residential development and A4174 exposing new development to noise and/or increasing noise for existing residents due to the substantial increase in hard surfaces and removal of natural sound absorbing surfaces due to site development.**

d. Can satisfactory vehicular access to the site be achieved?

Response: “No.”

**Comment/Objection:**

**The sites are located on opposite sides of a section of the A4174 that is Dual Carriageway with national speed limit.**

**The proposed sites would place residential development between existing residential development and A4174 exposing new development to noise and/or increasing noise for existing residents due to the substantial increase in hard surfaces and removal of natural sound absorbing surfaces due to site development.**

e. Can satisfactory vehicular access to the site be achieved?

Response: “Yes.”

**Comment/Objection:**

**Although access is satisfactory for current use of the site, for proposed development access will be less than satisfactory without major improvements and expansion of existing local public highways.**

f. Is the site subject to any other key constraints?

Response: “No.”

**Comments/Objection:**

**One of the sites is in the middle of  Conservation Area as defined by SGC.**

4. Comments on Details Contained in Section 6 (Site Suitability Issues) of the “Site Submission Form” as Submitted by :

| | |
|---|---|
| | a. Site Availability Issues:<br><br>Estimated delivery rate: When do you think the site would come forward for development?<br><br>believe that development could start within 5 years.<br><br>**Comments/Objection:**<br><br>**The sites submitted are not under sole ownership, only represent the owner of one site. The owner of the other site has indicated that they have no plans for significant development of the site in the next twenty years.**<br><br>5. Comments on the Content of Representations to the West of England Joint Spatial Plan Dated 19th December 2016 Attached to the Lodged SGC Site Submission Form:<br><br>a. Page 4, Paragraph 4:<br><br>"The land offers the potential to deliver approximately 100 dwellings should the Cricket Pitch be relocated to the site in – a mere 600m further along .<br><br>**Comments/Objection:**<br><br>**The physical relationship between the existing and proposed site for cricket pitch is not "a mere 600m further along ."**<br><br>**It is 750m further along the road which itself has public footpath for about 200m on one side only, the rest being without footpath, narrowing to single vehicle width in places, with poor lighting, twisty lanes (SGC description of access roads in the area) with narrow single passing places and lack of pedestrian refuges. There is no Public Transport and personal security would be an issue for elderly, young or vulnerable individuals due to remoteness, especially at night.**<br><br>b. Page 4, Paragraph 4:<br><br>"The c. 96 dwelling figure could be achieved through a higher density development at around 60dph – similar to that of the nearby development."<br><br>**Comments/Objection:**<br><br>**The high density development at is based on three storey buildings and which would be wholly inappropriate in this location.** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Derrick Hardwick |
| **Comment ID** | 10195137/2266 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG449 |
| **Attached documents** | SG449 Land at Wotton Road, Rangeworthy.pdf (5.8 MB) |

| | |
|---|---|
| **Respondent Name** | Ashfield Land |
| **Comment ID** | 16658689/2276 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG32<br><br>6.0 **LAND WEST OF CASTLE FARM ROAD, HANHAM:**<br><br>6.1 The site controlled by Ashfield Land lies to the West of Castle Farm Road and South of Hencliffe Way and is formed from three irregularly |

shaped fields. There is a PROW which runs across the middle of the site from North to South and a circular PROW which runs around the Northern boundary of the site. Hencliffe Woods form the Southern and Western boundaries of the land.

6.2 The site is not designated within a Flood Zone, nor within an AONB, Conservation Area, SSSI, SNCI, Air Quality Management Area, or otherwise. The site itself is therefore unconstrained in terms of its effect on 'designated areas' as defined in the NPPF, with the exception of the land lying within the Green Belt. It should be noted that there are two Listed Buildings on Castle Farm Road and a registered Historic Park and Garden to the South West of the site; both of which may require mitigation and a sensitive design approach to ensure adverse effects on these assets are avoided. Furthermore, a SSSI lies to the South East of the site (known as Cleeve Wood) which will also require sensitive ecological mitigation.

6.3 There have been no previous Planning Applications for the residential development of the site but on behalf of Ashfield Land we submitted a request for Pre-application Advice in September 2016 and we have also submitted the site for assessment in the HELAA/SHLAA within the Policies, Sites and Places (PSP) Examination and other regular Call for Sites.

**Pre-Application:**

6.4 As set out above, we submitted a request for Pre-application Advice from the Council in September 2016. As part of this request we also submitted a number of initial technical assessments and requested a full response to be received in relation to Conservation, POS, Landscape, AH, Archaeology, Transport, Urban Design, Ecology and PROWs, and overall Planning Policy assessment.

6.5 Responses were received from technical Consultees and we will go on to discuss these in the next section of this statement. Unfortunately, a response was never received from the Planning Policy Officers but a meeting and informal discussions with them suggested that due to recent Case Law (such as the Supreme Court judgment and the Barwood case), Officers would not be able to accept a new residential development site in the Green Belt even when a five-year housing land supply deficit was evident. Therefore, it was advised that the site would need to progress through the Local Plan preparation process.

6.6 Since this time, Ashfield Land have sought to address the concerns raised by the Consultees at South Gloucestershire Council by instructing further technical work to assess the constraints, opportunities, and explore potential mitigation for the site. These assessments have informed the Masterplan which can be found in Appendix C to this Document.

6.7 The Illustrative Masterplan shows 182 dwellings, public open space, woodlands areas and green corridors free of development, with the primary access from Castle Farm Road, and a potential secondary access from Hencliffe Way for a future phase of development. Ashfield Land would like to submit an Outline Application for this development as soon as practically possible but have been advised that it would be appropriate to wait for an allocation in the Draft Plan and an Inspector's Report confirming it is a suitable and deliverable site.

**Comparison of Alternatives:**

6.8 It is our understanding that there are no other available sites on the edge of Hanham available and this would be the only logical location for development on the edge of the existing settlement. There are other sites on the edge of Longwell Green and we assume that these refer to a different requirement and that both sites could come forward.

6.9 However, if it resulted in a competing requirement for development we would advocate that the Land at Castle Farm Road should be selected in preference to the other sites on the edge of Longwell Green. This is for a number of reasons but primarily this is due to the area's landscape interest which comprises rolling hills with a prominent ridgeline, which means that it's highly visible from the surrounding area. Furthermore, it has been determined in the Green Belt Assessment Stage 2 undertaken by the WECA that this area makes a contribution to checking unrestricted sprawl and we agree with this assertion given that this area comprises a large area of farmland and links in with the wider countryside to the East.

7.0 **TECHNICAL ASSESSMENTS AND THE EMERGING MASTERPLAN:**

7.1 As previously explained, Ashfield Land have instructed Technical Consultants to assess the site and produce a Masterplan that shows how the site could be developed without resulting in significant adverse effects. Furthermore, the emerging Masterplan has taken into consideration the results of the Pre-application Advice received in January 2017. The current Consultant Team consists of the following:

• Planning Consultancy – Grass Roots Planning

• Masterplanning – Urban Design Box

• Landscape – Liz Lake Associates

• Ecology – Grass Roots Ecology

• Heritage/Archaeology – AB Heritage

• Highways – TPA

**Highways:**

7.2 An assessment of the highways network in the local area and an initial technical assessment has been provided by TPA and this can be found in Appendix D to this Document. They have also designed the initial access point into the site as part of the emerging layout.

7.3 As part of the Pre-application request we submitted two suitable options for road improvement works on Castle Farm Road to the Highways Officer at South Gloucestershire Council which would enable a safe and suitable access point to be provided along this part of the site. This would serve the first 50 – 80 dwellings to be delivered, with a secondary access proposed from Hencliffe Way for the second phase of development. In future this could become the primary access serving the site with Castle Farm Road being downgraded, if considered necessary by SGC. Ashfield Land are currently pursuing options to obtain land for an access point through to Hencliffe Way.

7.4 TPA's initial assessment concludes that with either of the two proposed options for improvement works to Castle Farm Road the surrounding network has the capacity for an additional 200 dwellings without giving rise to significant adverse effects. Furthermore, the site lies within a highly sustainable location with access to a number of everyday facilities including Schools and a Medical Centre, meaning a high number of trips can be replaced by walking or cycling.

7.5 As such, the site is a suitable and sustainable location for non-strategic scale development of up to 200 dwellings.

**Flood Risk and Drainage:**

7.6 The site lies within Flood Zone 1 and therefore is at low risk from flooding. However, Castle Farm Road and the North Eastern edge of the site is subject to some minor surface water flooding issues which need to be addressed as part of any forthcoming Application (Flood Map for Planning shown below in Figure 3). These surface water flooding issues are not considered to preclude development across the entirety of the site and it is thought that drainage can be discharged in this area via attenuation basins or soakaways depending on final ground conditions analysis. The topography of the land, which runs North West to South East, suggests that the South Eastern part of the site could be a suitable location for such features.

*Figure 3. Flood Map for Planning*

Please see the attached Document for Figure 3 which is referenced above

7.7 Technical work will be instructed in due course to determine the most suitable method of drainage on site and we would be amenable to discussing this matter with the Council to determine when they would like to see this information submitted to further assist their assessment of the site's potential.

**Ecology:**

7.8 An Ecological Constraints Report was undertaken by Grass Roots Ecology in February 2017 (see Appendix E) and this identified the following features of interest for the site:

• Hencliffe Woods is a designated Site of Nature Conservation Interest (SNCI) due to its woodland habitat;

• To the East of the site is Cleeve Wood, a SSSI;

• There are known records for Great Crested Newts within the site and therefore Site-specific Surveys are required for the pond to determine whether any species might be using the area;

• Surveys for Hazel Dormice are recommended if parts of the existing hedgerow network are to be removed;

• Some slow worms might be present on site;

• Areas of suitable habitat should be retained; and

• Bat foraging was evidenced within the woodland edge of the site including the Greater Horseshoe Bat and therefore adequate mitigation needs to be undertaken in respect to protecting this species.

7.9 One of the main mitigation proposals aimed at addressing the ecological constraints that affect the site includes a 15m buffer on the Western boundary. This is required due to the adjacent SNCI and bat populations which were found to be present as part of the initial Bat Surveys undertaken.

7.10 Other mitigation proposals include providing a range of bird and bat boxes; designing a sensitive lighting scheme within identified buffer zones to ensure Dark Corridors are achieved; providing species-rich grassland within the POS, woodland areas, and transitional planting along the edge of the site; retaining other habitat features of value on the site; and retaining the existing badger sett with an appropriate buffer around it to mitigate any potential impact on this species.

7.11 As such, it is clear that there are no overriding ecological constraints to the site's development. The Council's Ecology Officer raised no substantive issues during the process of the Pre-application and suggested that there would be no overriding ecological constraint to the site's development, subject to Site-specific Surveys being undertaken, and suitable mitigation proposed as part of the finalised Masterplan.

**Landscape:**

7.12 The Pre-application Advice received from SGC included an objection from the Landscape Officer as it would affect the openness of the Green Belt; would result in the loss of BMV agricultural land; would result in the loss of a landscape buffer; and would require an LVIA to be produced for any forthcoming Application. These Comments were made on the basis of very little technical evidence being provided in support of the initial Pre-application Submission on the subject of landscape and Green Belt impact.

7.13 To respond to these Comments a Green Belt Assessment and Landscape and Visual Impact Appraisal was undertaken by Liz Lake Associates. This work is contained as Appendix F and establishes the following constraints and opportunities in respect to the site:

• The site is visually contained from the surrounding area;

• Its visual prominence is therefore judged to be low;

• There are some attractive features and views;

• There are some public views from the surrounding PROW;

• There will unavoidably be views locally from the rear of residential properties located along Hencliffe Way;

• However, the site is generally well screened from the South West and the North East, due to tree belts and/or surrounding dwellings;

• Changes to views from within the woodland would be minimal and very limited;

• There is an existing long view from Stockwood Vale to the South of the site, although this view would only be experienced by drivers for a short period of time, and whose focus would not be directed towards the site as they would be travelling East to West; and

• Overall although the site has a slight undulation in topography there is scope for mitigation including a sensitive design approach which would enhance and soften the developed edge of Hanham.

7.14 To respond to the issues identified the following mitigation was recommended and is now incorporated into the submitted Masterplan:

• Buildings, structures and hard-standing should avoid tree protection areas for existing trees, and an Arboricultural Survey should be undertaken in due course;

• Retain woodland and tree belts to boundaries as well as existing hedgerows, which will soften the built development from adjacent residential properties and gardens;

• Include woodland play area and picnic areas along the South Western boundary, connecting to the existing picnic areas and walking routes;

• Creation of large area of public open spaces for community use and providing an appropriate setting to Hencliffe Wood;

• Creation of green swale corridors accommodating attenuation areas and to provide additional habitats;

• Improvement of informal and formal walking routes across the site;

• Reinstate historic hedgerows;

• Properties to the Eastern edge should be offset from the existing rear boundaries of adjacent properties to respect amenity and privacy. Development should follow historic settlement pattern;

• Retain long views to the South of the site from Stockwood Vale; and

• The internal street pattern should allow for the integration of planting, including street trees to help soften the built development's appearance and provide visual amenity.

7.15 To date no specific assessment of the site's contribution to the Green Belt has been undertaken and it was not assessed as part of the Stage 2 Assessment (November 2016) that formed part of the JSP Evidence Base; we assume this is because that assessment sought to look at strategic scale development only. The Green Belt assessment undertaken by Liz Lake Associates (see Appendix G) assessed the site's contribution towards the five functions of the Green Belt.

7.16 The assessment concluded that the land only partially fulfils two of the functions of the Green Belt, namely: restricting urban sprawl; and safeguarding the countryside from encroachment. It is also noted that all Greenfield land would partially or fully meet these criteria.

7.17 In light of this conclusion it is their professional opinion that there would only be a slight adverse effect on the Green Belt if the site were to be developed in the way it is currently suggested, and this impact would be highly limited in extent.

7.18 We therefore consider that this additional work and the mitigation steps proposed would overcome the Landscape Officer's initial concerns since the Pre-application in 2016. Accordingly, we consider that the site offers an optimal location for Green Belt land release when compared to alternative locations on the Eastern Fringe of Bristol, where land contributes more strongly to the function of the Green Belt and is less visually contained.

**Agricultural Land Quality:**

7.19 The Natural England provisional Agricultural Land Quality Mapping for the area suggests that the site will be Grade 3 (moderate to good). Grade 3 divides into 3a and 3b, with only Grade 3a falling into 'best and most versatile' agricultural land classification. Paragraph 121 of the NPPF requires that:

*'Local Planning Authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, Local Planning Authorities should seek to use areas of poorer quality land in preference to that of a higher quality.'*

7.20 Further assessment work will need to be undertaken to determine the exact agricultural classification of the land. However, even if the land is

| | |
|---|---|
| | identified as being 3a this is the lowest quality within the best and most versatile category and the operational constraints on the land must also be considered when assessing whether it is suitable to release for development.<br><br>7.21 The land is divorced from other agricultural land and does not form part of a dedicated agricultural holding with a centralised farmstead. Modern farming now relies on economies of scale to be profitable with farms becoming larger as time progresses, so they can utilise larger machinery and processing facilities to add value to agricultural products. The site at Castle Farm Road cannot be practically farmed as part of a larger, more effective holding, and this needs to be considered when deciding whether it is appropriate to utilise it to accommodate residential development, given its sustainable access credentials that have been identified.<br><br>7.22 It is our view that given its accessible nature and the fact that the parcel is divorced from wider agricultural land holdings, the site should be allocated for residential development even if later analysis identifies it as being best and most versatile quality. The size of the site is also not of such a scale that would mean that the loss of its potential use as agricultural land would have a significant and demonstrable adverse effect on the economy in any event.<br><br>**Heritage/Archaeology:**<br><br>7.23 As part of the Pre-application Advice received from SGC the Conservation Officer raised a number of concerns regarding the development's potential impact on Listed Buildings located nearby. In response to this AB Heritage were instructed to assess the proposals and prepare a Listed Buildings Settings Assessment to ascertain any impact on heritage from the development and suggest suitable mitigation if required. Their Report can be found as Appendix H to this statement.<br><br>7.24 Their assessment found that through suitable mitigation including planting in closest proximity to the Listed Buildings, as well as restricting building heights and mass of the proposed development to the Eastern edge, there would be no adverse impact on the Listed Buildings or other Heritage Assets of merit that lie in proximity to the site.<br><br>7.25 We therefore conclude that adequate mitigation has been considered which alleviates the Conservation Officer's concerns from the Pre-application Advice, and this will continue to be investigated further by AB Heritage as part of any future allocation process or forthcoming Application.<br><br>**Arboriculture:**<br><br>7.26 No specific tree assessments have been undertaken to date, however the appointed master Planners have taken a conservative approach and are providing the adjacent woodland with significant buffer zones within which no residential development is proposed.<br><br>7.27 These buffer zones significantly exceed the normal tree protection zones that would be applied to protect retained trees and therefore it is not envisaged that any adverse effects on the adjacent woodland will arise from the residential development proposed here. Further work will be undertaken to inform appropriate Conditions that could be applied to any Planning Permission to ensure this remains the case.<br><br>**Emerging Masterplan:**<br><br>7.28 The technical work that has been undertaken so far has been used by the scheme masterplanners to produce a framework illustrative Masterplan for the site which is enclosed as Appendix C. The Masterplan seeks to provide circa 180 dwellings, woodland and picnic areas, public open space and Green Corridors. This plans for the entirety of the Land at Castle Farm Road in two phases of development.<br><br>7.29 The technical work will continue to be refined as the site progresses but currently the Masterplan responds to the following design principles:<br><br>• 15m buffer from Hencliffe Wood to include Green Corridors, significant planting and new woodlands;<br><br>• Two points of access – one from Castle Farm Road and a second potential future access from Hencliffe Way;<br><br>• Restriction of development heights within the Eastern part of the site;<br><br>• Woodlands and Play areas as part of the mitigation to the Listed Building;<br><br>• Focal buildings on street corners to give navigation to the site;<br><br>• Green Corridors providing buffers along the existing PROWS across the site and around the site's boundaries;<br><br>• Public Open space fronted on by residential dwellings to increase natural surveillance; and<br><br>• Areas suitable for accommodating soakaways and/or other water attenuation features.<br><br>7.30 We therefore consider that the Masterplan is underpinned by significant technical work and demonstrates how the site could be developed to accommodate circa 180 dwellings without giving rise to significant adverse effects. Consequently, the site presents a deliverable, viable option for development in this sustainable location and should be included as a formal allocation in the NLP in due course. |
| **Attached documents** | Ashfield Land - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (30.0 MB) |

| | |
|---|---|
| **Respondent Name** | Matthew Kendrick - Grass Roots Planning Ltd |
| **Comment ID** | 4889857/2284 |
| **Document Part Name** | Question 20 - Call for Sites |

| | |
|---|---|
| **Comment** | SG32 |
| **Attached documents** | SG32 Land at Castle Farm Road, Hanham.pdf (28.6 MB) |

| | |
|---|---|
| **Respondent Name** | Sean Lewis - Tetlow King Planning |
| **Comment ID** | 14471937/2304 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG283 |
| **Attached documents** | SG283 Land at Williams Close, Longwell Green.pdf (6.2 MB) |

| | |
|---|---|
| **Respondent Name** | R. Butt - Morris & Co |
| **Comment ID** | 18047681/2307 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG469 |
| **Attached documents** | SG469 Land West of Yate Road-Stover Road, Yate.pdf (3.2 MB) |

| | |
|---|---|
| **Respondent Name** | Deborah Martin - Beech Hill Caravan Storage |
| **Comment ID** | 16042113/2308 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG470 |
| **Attached documents** | SG470 Land at Beech Hill Farm, Westereleigh Road, Yate.pdf (127 KB) |

| | |
|---|---|
| **Respondent Name** | Paul Jobson - DLP Planning Ltd |
| **Comment ID** | 11267937/2309 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG13 |
| **Attached documents** | SG13 Land West of Bristol Road, Thornbury.pdf (8.6 MB) |

| | |
|---|---|
| **Respondent Name** | James Shorten - Geo Ltd |
| **Comment ID** | 19852129/2310 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG232 |
| **Attached documents** | SG232 Land at 375 Badminton Road, Nibley, Yate.pdf (903 KB) |

| | |
|---|---|
| **Respondent Name** | Kit Stokes - Stokes Morgan Planning Ltd |
| **Comment ID** | 19451073/2312 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG430 |
| **Attached documents** | SG430 Land at Bristol Road, Frampton Cotterell.pdf (1.3 MB) |

| | |
|---|---|
| **Respondent Name** | Charlotte Pink - John Alison Land and Research Ltd |
| **Comment ID** | 19732769/2313 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG426 |
| **Attached documents** | SG426 Land at Park Mill Farm and Quarry Farm, Thornbury.pdf (4.1 MB) |

| | |
|---|---|
| **Respondent Name** | Ben Pearce - Land, Development & Planning Consultants Ltd |
| **Comment ID** | 14859809/2314 |

| | |
|---|---|
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG427 |
| **Attached documents** | SG427 Land to the Rear of Almshouses, Marshfield, Chippenham.pdf (1.3 MB) |

| | |
|---|---|
| **Respondent Name** | Alastair McChesney - Homes England |
| **Comment ID** | 19732929/2315 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG428 |
| **Attached documents** | SG428 Land at Former Kleeneze Site, Ansteys Road, Hanham.pdf (1.2 MB) |

| | |
|---|---|
| **Respondent Name** | David Mace |
| **Comment ID** | 19740961/2317 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG446 |
| **Attached documents** | SG446 Land at York Gardens, Winterbourne.pdf (1.8 MB) |

| | |
|---|---|
| **Respondent Name** | Pamela Gardner |
| **Comment ID** | 19732161/2318 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG419 |
| **Attached documents** | SG419 Land at 404 North Road, Yate.pdf (518 KB) |

| | |
|---|---|
| **Respondent Name** | Marcus Plaw - CBRE Ltd |
| **Comment ID** | 17918497/2336 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG96 |
| **Attached documents** | SG96 Land at Vattingstone Lane, Alveston.pdf (13.3 MB) |

| | |
|---|---|
| **Respondent Name** | Matthew Kendrick - Grass Roots Planning Ltd |
| **Comment ID** | 4889857/2352 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG93 |
| **Attached documents** | SG93 Land North of Iron Acton Way and East of Dyer's Lane, Engine Common, Yate.pdf (8.9 MB) |

| | |
|---|---|
| **Respondent Name** | Claire Hawkes - Turley |
| **Comment ID** | 12499233/2353 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG608 |
| **Attached documents** | SG608 Land at Vilner Farm, Thornbury.pdf (6.4 MB) |

| | |
|---|---|
| **Respondent Name** | Matthew Blaken - David James & Partners |
| **Comment ID** | 16471649/2354 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG312 |
| **Attached documents** | SG312 Land Behind 189 to 207 North Road, Yate.pdf (1.1 MB) |

| | |
|---|---|
| **Respondent Name** | Karen and John Connors |

| | |
|---|---|
| **Comment ID** | 20459681/2355 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG607 |
| **Attached documents** | SG607 Land at Bridge View, Westereleigh Road, Westerleigh.pdf (113 KB) |

| | |
|---|---|
| **Respondent Name** | Larry Harvey |
| **Comment ID** | 15301729/2356 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG612 |
| **Attached documents** | SG612 Land at Henfield Paddock, Henfield Road, Coalpit Heath.pdf (119 KB) |

| | |
|---|---|
| **Respondent Name** | Cornelius Hegarty |
| **Comment ID** | 20485345/2357 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG613 |
| **Attached documents** | SG613 Land at Hill View, Badminton Road, Yate.pdf (115 KB) |

| | |
|---|---|
| **Respondent Name** | Kevin Hunt - JLL |
| **Comment ID** | 2880865/2358 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG604 |
| **Attached documents** | SG604 Land at Sports Ground, Station Road, Henbury.pdf (1.5 MB) |

| | |
|---|---|
| **Respondent Name** | Paul Davis - Persimmon Homes Severn Valley |
| **Comment ID** | 3553569/2359 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG112 |
| **Attached documents** | SG112 Land East of Chipping Sodbury, East of St. Johns Way.pdf (2.0 MB) |

| | |
|---|---|
| **Respondent Name** | Kit Stokes - Stokes Morgan Planning Ltd |
| **Comment ID** | 19451073/2360 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG412 |
| **Attached documents** | SG412 Land at Grove Farm, Coxgrove Hill, Pucklechurch.pdf (960 KB) |

| | |
|---|---|
| **Respondent Name** | Linda Clewer |
| **Comment ID** | 3859969/2361 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG415 |
| **Attached documents** | SG415 Land on the North West Side of Gloucester Road, Almondsbury.pdf (4.3 MB) |

| | |
|---|---|
| **Respondent Name** | Janet Wilson |
| **Comment ID** | 14392961/2362 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG179 |
| **Attached documents** | SG179 Land at The Bungalow, Cutts Heath, Wotton Under Edge.pdf (1.4 MB) |

| | |
|---|---|
| **Respondent Name** | Bryn Howells MRICS MRTPI - Manor Farm Estates Ltd |
| **Comment ID** | 19323905/2363 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG464 |
| **Attached documents** | SG464 Land at Bridgeyate.pdf (1.4 MB) |

| | |
|---|---|
| **Respondent Name** | Ian and Eleanor Dobson |
| **Comment ID** | 19366113/2364 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG418 |
| **Attached documents** | SG418 Land at Straight Mile, Gloucester Road, Rudgeway.pdf (1.8 MB) |

| | |
|---|---|
| **Respondent Name** | Bryn Howells MRICS MRTPI - Manor Farm Estates Ltd |
| **Comment ID** | 19323905/2365 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG137 |
| **Attached documents** | SG137 Land at Bridgeyate.pdf (934 KB) |

| | |
|---|---|
| **Respondent Name** | Mike and Debbie Burrett |
| **Comment ID** | 19732193/2366 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG420 |
| **Attached documents** | SG420 Land at Oakleigh, Tockington Park Lane, Almondsbury.pdf (1.0 MB) |

| | |
|---|---|
| **Respondent Name** | Sarah Green |
| **Comment ID** | 19759265/2367 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG465 |
| **Attached documents** | SG465 Land at 15 and 17a London Road, Warmley.pdf (1.6 MB) |

| | |
|---|---|
| **Respondent Name** | Pete Stockall - GVA |
| **Comment ID** | 5782785/2368 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG423 |
| **Attached documents** | SG423 Land at Players Lane, Hambrook.pdf (362 KB) |

| | |
|---|---|
| **Respondent Name** | John Rooney - Stokes Morgan Planning Ltd |
| **Comment ID** | 19730593/2369 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG424 |
| **Attached documents** | SG424 Land at 111 Marsh Common Road, Pilning.pdf (1.5 MB) |

| | |
|---|---|
| **Respondent Name** | J. T. Seymour Williams and A. E. Graves |
| **Comment ID** | 20501441/2370 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG432 |
| **Attached documents** | SG432 Land at Webbs Heath and Springfields, Bridgeyate, Warmley.pdf (7.7 MB) |

| | |
|---|---|
| **Respondent Name** | D. E. and J. F. Peacock |
| **Comment ID** | 19733217/2371 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG313 |
| **Attached documents** | SG313 Land at Paddock, Behind The Cross Keys Public House, North Road, Yate.pdf (5.8 MB) |

| | |
|---|---|
| **Respondent Name** | John Rooney - Stokes Morgan Planning Ltd |
| **Comment ID** | 19730593/2372 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG431 |
| **Attached documents** | SG431 Land at School Garden Nursery, Elberton Road, Olveston.pdf (1001 KB) |

| | |
|---|---|
| **Respondent Name** | Kevin Morley - Stokes Morgan Planning Ltd |
| **Comment ID** | 19736737/2373 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG433 |
| **Attached documents** | SG433 Land at Ben's Tiles and Reclamation Ltd, 119 Bristol Road, Frampton Cotterell.pdf (1.4 MB) |

| | |
|---|---|
| **Respondent Name** | Kit Stokes - Stokes Morgan Planning Ltd |
| **Comment ID** | 19451073/2374 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG434 |
| **Attached documents** | SG434 Land at Alveston Hotel, Davids Lane, Alveston.pdf (828 KB) |

| | |
|---|---|
| **Respondent Name** | Emma Geater - Crest Nicholson South West |
| **Comment ID** | 19738177/2375 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG322 |
| **Attached documents** | SG322 Land Adjacent to Alexander Hosea Primary School, Wickwar.pdf (980 KB) |

| | |
|---|---|
| **Respondent Name** | Tom Jacques - Jacques Partnership |
| **Comment ID** | 14395041/2376 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG189 |
| **Attached documents** | SG189 Land at Church Farm, Acton Turville.pdf (794 KB) |

| | |
|---|---|
| **Respondent Name** | Sara Tucker - North & Letherby Ltd |
| **Comment ID** | 19730785/2377 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG139 |
| **Attached documents** | SG139 Land Between Brins Close, Field Farm Close, and Hunts Ground Road, Stoke Gifford.pdf (1.3 MB) |

| | |
|---|---|
| **Respondent Name** | William Crew |
| **Comment ID** | 20505729/2378 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG360 |

| | |
|---|---|
| **Attached documents** | SG360 Land off High Street, The Three Horseshoes.pdf (791 KB) |

| | |
|---|---|
| **Respondent Name** | William Crew |
| **Comment ID** | 10947649/2379 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG361 |
| **Attached documents** | SG361 Land Between The Acre - Brook House.pdf (796 KB) |

| | |
|---|---|
| **Respondent Name** | J. Hughes |
| **Comment ID** | 14264833/2380 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | Dear Sir/Madam,<br><br>In reply to your Consultation letter, I quote, 'Call for Sites.'<br><br> is not a working farm as such. It sits on four and a half acres of land. Over the past years or so I have tried to use one half of an acre to build a few houses on. Although I love every single square inch of our home we also have to consider. Our is years old. and are paying per Month on house rent, with no chance to save a large enough deposit for their own home. This being the only reason I would sell any of our land. It has a few buildings and a barn on it which could be converted but would be better for new build houses. My and I have between us.<br><br>The small parcel of land is road frontage and really unused. The local Planning Department have in the past said of Applications [Not at this time or we don't advise you to take the Planning Application any further].<br><br>Your Comments would be very much appreciated. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Yvonne Hulbert |
| **Comment ID** | 19740801/2381 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG443 |
| **Attached documents** | SG443 Land at The Rose and Crown, Wotton Road, Rangeworthy.pdf (512 KB) |

| | |
|---|---|
| **Respondent Name** | Mrs. R. Jarrett and Mrs. L. Harris |
| **Comment ID** | 19741057/2382 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG447 |
| **Attached documents** | SG447 Land at Springwater Farm, Brewery Hill, Bitton.pdf (2.2 MB) |

| | |
|---|---|
| **Respondent Name** | Kit Stokes - Stokes Morgan Planning Ltd |
| **Comment ID** | 19451073/2383 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG448 |
| **Attached documents** | SG448 Land at Church Farm, Moorhouse Lane, Hallen.pdf (1.2 MB) |

| | |
|---|---|
| **Respondent Name** | Gillian Forward - Hanham District Green Belt Conservation Society |
| **Comment ID** | 16478273/2384 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG456 |
| **Attached documents** | SG456 Land at Kleeneeze, Ansteys Road-Martins Road-New Walk, Hanham.pdf (1.2 MB) |

| | |
|---|---|
| **Respondent Name** | Richard and Nicholas Bendrey |
| **Comment ID** | 20510305/2385 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG372 |
| **Attached documents** | SG372 Land at The Sawmills, Bath Road, Warmley.pdf (1.5 MB) |

| | |
|---|---|
| **Respondent Name** | Chris Hays - Cushman & Wakefield |
| **Comment ID** | 1534017/2386 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG193 |
| **Attached documents** | SG193 Land at Chief Trading Post, The Nurseries, Barry Road, Oldland Common.pdf (1.2 MB) |

| | |
|---|---|
| **Respondent Name** | Neil Boyett |
| **Comment ID** | 12499297/2387 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG476 |
| **Attached documents** | SG476 Land at April Cottage, 180 Shortwood Road, Pucklechurch.pdf (1.1 MB) |

| | |
|---|---|
| **Respondent Name** | Tim Catley |
| **Comment ID** | 14803617/2388 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG84 |
| **Attached documents** | SG84 Land at Forty Acre Lane Field, Forty Acre Lane.pdf (871 KB) |

| | |
|---|---|
| **Respondent Name** | Tim Catley |
| **Comment ID** | 14803617/2389 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG103 |
| **Attached documents** | SG103 Land at Glebe Field and Wood, Primrose Corner, Hazel Lane, Rudgeway.pdf (1.0 MB) |

| | |
|---|---|
| **Respondent Name** | Tim Catley |
| **Comment ID** | 14803617/2390 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG483 |
| **Attached documents** | SG483 Land at Down Road Field, Primrose Corner, Hazel Lane, Rudgeway.pdf (855 KB) |

| | |
|---|---|
| **Respondent Name** | Tom Stanley - Knight Frank LLP |
| **Comment ID** | 19926209/2391 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG599 |
| **Attached documents** | SG599 Land at Oakfield Farm, Green Lane, Bagstone, Wotton-Under-Edge.pdf (1.1 MB) |

| | |
|---|---|
| **Respondent Name** | Philip Robinson |
| **Comment ID** | 14860129/2392 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG227 |
| **Attached documents** | SG227 Land to the East of Green Lane, Marshfield (Between the Water Tower and Green Lane).pdf (1.1 MB) |

| | |
|---|---|
| **Respondent Name** | Anna Howes |
| **Comment ID** | 20664257/2393 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG615 |
| **Attached documents** | SG615 Land at Castle Farm, Poplar Lane, Wickwar, Wotton-Under-Edge.pdf (1.2 MB) |

| | |
|---|---|
| **Respondent Name** | Jeremy D. G. Evans |
| **Comment ID** | 20665121/2395 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG616 |
| **Attached documents** | SG616 Land at Gilslake Farm, Pilning.pdf (3.8 MB) |

| | |
|---|---|
| **Respondent Name** | Chris Dawson - LiveWest |
| **Comment ID** | 20740897/2396 |
| **Document Part Name** | Question 20 - Call for Sites |
| **Comment** | SG311 |
| **Attached documents** | SG311 Land at Yate Road, Iron Acton Forming Part of Holly Hill Farm.pdf (857 KB) |

| | |
|---|---|
| **Respondent Name** | Mr. Sheppard |
| **Comment ID** | 19808865/485 |
| **Document Part Name** | Question 21 - Sustainable Access Profiles |
| **Comment** | Please see attached Document. |
| **Attached documents** | Mr. Sheppard.pdf (62 KB) |

| | |
|---|---|
| **Respondent Name** | P. Hodson |
| **Comment ID** | 19809505/551 |
| **Document Part Name** | Question 21 - Sustainable Access Profiles |
| **Comment** | **Ref: Local Plan Consultation Document (February 2018):**<br><br>Dear Sirs,<br><br>With reference to the proposed development of land in Hanham around Abbots Road, Riverside Estate, Hanham Cricket Club and Willsbridge Hill for housing and associated works.<br><br>As we are the owners of a house in  we are strongly opposed to any such buildings for the following reasons;<br><br>1) The proposed development will adversely affect the amenities enjoyed by the residents of nearby and adjoining properties.<br><br>2) We cannot see any buildings being erected in this vicinity without intruding on our privacy.<br><br>3) The erection of any additional dwellings in this location will generate additional traffic affecting road access, visibility and parking, and will be a major hazard to road safety in a quiet rural area.<br><br>4) There is already a major shortage of places in local Schools for children living in this area, and any additional housing will only increase the difficulty we already have in finding places for our children.<br><br>5) Our local Health Centre is already very busy, and this development will only compound the problem.<br><br>6) The proposed development will cause additional noise and disturbance affecting local residents. |

| | |
|---|---|
| | 7) Abbots Road and Court Farm Road are fairly narrow and winding roads, which are already subject to frequent vehicular damage to boundary walls.<br><br>Any further increase in the volume of traffic will inevitably lead to more accidents and possible injury to the pedestrians who are forced to walk in the unpaved road.<br><br>There is no designated footpath along Abbots Road on the side of the road that the development is planned resulting in residents having to twice cross, an already busy road, in order to get to the local shops.<br><br>Traffic calming has had no affect on the volume of vehicles using Abbots Road & Court Farm Road, likewise on the speed of traffic (as can be seen by the ineffective measures made outside Hanham High School, Memorial Road).<br><br>8) The proposed development will result in the loss of valuable open space and loss of natural habitat for wildlife.<br><br>9) There are already numerous Housing Development Plans in the Hanham area, and it is not acceptable to increase the destruction of more green-space when the potential to use existing 'Brownfield' sites has not been exploited.<br><br>Finally we would like to point out that when our house was originally purchased  years ago, the land in question was in established Green Belt area and with no intentions of this changing.<br><br>The view of Hanham Hills is precious to the residents of the locale and we feel that it is important to preserve this for our children and future generations. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Allison Willis & Mark Willis |
| **Comment ID** | 19809601/563 |
| **Document Part Name** | Question 21 - Sustainable Access Profiles |
| **Comment** | Dear Sirs,<br><br>We are writing to voice strong objections to the proposed plans to develop the following areas for residential building:<br><br>Hanham Hills<br><br>Wills Park, Gover Road<br><br>Hanham Cricket Club, Abbotts Road<br><br>Riverside Estate<br><br>Our Objections are as follows:<br><br>We can not destroy these few remaining green and beautiful spaces. They are utilised and enjoyed daily by the local community.<br><br>Hanham's existing infrastructure and local amenities simply can not cope with a further influx of the proposed numbers of people.<br><br>These sit within a Conservation Area which must be protected for future generations.<br><br>The old Kleenezee site should be redeveloped before destroying green spaces. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Janet Sheppard |

| | |
|---|---|
| **Comment ID** | 19809633/565 |
| **Document Part Name** | Question 21 - Sustainable Access Profiles |
| **Comment** | Dear Sirs,<br><br>We are writing to voice strong objections to the proposed plans to develop the following areas for residential building:<br><br>Hanham Hills<br><br>Wills Park, Gover Road<br><br>Hanham Cricket Club, Abbotts Road<br><br>Riverside Estate<br><br>Our Objections are as follows:<br><br>We can not destroy these few remaining green and beautiful spaces. They are utilised and enjoyed daily by the local community.<br><br>Hanham's existing infrastructure and local amenities simply can not cope with a further influx of the proposed numbers of people.<br><br>These sit within a Conservation Area which must be protected for future generations.<br><br>The old Kleenezee site should be redeveloped before destroying green spaces. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Roy & Elizabeth Moody |
| **Comment ID** | 19831745/600 |
| **Document Part Name** | Question 21 - Sustainable Access Profiles |
| **Comment** | We wish to object, very strongly, to the proposals being discussed to take away our cricket ground in Abbots Road, Hanham and relocate it next to the Ring Road. Living locally we are very upset that this is being considered, especially when we understand that this parcel of land was left to the people of Hanham to be used for this purpose.<br><br>The number of new homes proposed is very high density and would be totally out of keeping with the surrounding area. Abbots Road itself is very narrow and how this could then become a major road to another development further down, when it gets so narrow at the Elm Tree Public House, seems impossible, with no way of widening this road.<br><br>We know we are very lucky to live in an area with open green spaces, but have paid a premium in house prices for that privilege.<br><br>We have heard that this is being considered by the Trustees of the Folk Centre because of their lack of money. Surely a better idea would be to locate the Folk Centre to the Cricket Field and then sell off that parcel of land in the middle of Hanham for building?<br><br>Once again it's the developers/landowners who are out to make large profits from this sort of development, thereby spoiling the lives of ordinary people, who believed they had found a lovely place to live and have made it their home. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Kenneth Gibbons |
| **Comment ID** | 19836737/717 |
| **Document Part Name** | Question 21 - Sustainable Access Profiles |
| **Comment** | **South Glos Local Plan 2018 Consultation Document:**<br><br>Dear Sir/Madam, |

| | |
|---|---|
| | I wish to make some Comments with regard to the above Document.<br><br>In particular I am referring to proposals in Hanham and Willsbridge.<br><br>Through the pressure of the house building that is needed, Planning Departments are falling into the trap of allowing developments in areas which do not have adequate infrastructure and where public facilities are already at breaking point.<br><br>The Hanham and Willsbridge sites are in many cases **accessed by roads which are merely country lanes**, not at all suitable for serving further development.<br><br>In terms of facilities in the area, Hanham Surgery is **struggling to meet the needs of current inhabitants** – so many people are currently expressing frustration over appointments and waiting times.<br><br>A further disappointing aspect to note is the situation regarding Schools. The **local Secondary School is described as "FULL" and "FAILING."**<br><br>Over the years Councillors have, quite commendably, been proud to boast of the virtues of the wooded Avon Valley and the beauty of Hanham Hills.<br><br>In addition the local area contains some **notable historic sites** such as Hanham Court, St. Georges Church, Stephens Green, the 'pound' etc, etc.<br><br>It would be very regrettable indeed to destroy the settings of these landmarks! |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Tony Albon-Crouch - Marshfield Parish Council |
| **Comment ID** | 15617697/1879 |
| **Document Part Name** | Question 21 - Sustainable Access Profiles |
| **Comment** | **Sustainable Access Audit:**<br><br>Although MPC recognise the need for a Sustainable Access Audit, we would point out that this is a basic tool which does not reflect the true position in our Parish and that conditions have changed. Bus services provide the only means of Public Transport and even obtaining a taxi can be difficult. With the ongoing reduction in local bus services, Public Transport is not a practical option for everyday modern working or living needs. Walking and cycling involves travel on busy A Roads often with no foot or cycle paths.<br><br>***Marshfield Parish Council does not recognise the current Sustainable Access Audit as providing an accurate Evidence Base of the ability of residents to access key services.*** |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Newland Homes |
| **Comment ID** | 2857441/2050 |
| **Document Part Name** | Question 21 - Sustainable Access Profiles |
| **Comment** | **Sustainability:**<br><br>5.8 The sustainability of Olveston has been assessed in the Sustainable Access Profiles produced by the Council in February 2018 as part of the SGLP process. Olveston benefits from the following services and facilities within the suitable walking and cycling catchments as specified by the Council in the Sustainable Access Profiles:<br><br>o 1 Primary School;<br><br>o 1 Community Centre;<br><br>o 1 Post Office;<br><br>o 1 Pub;<br><br>o 2 local convenience stores;<br><br>o 1 Church; |

| | |
|---|---|
| | o Bakery;<br><br>o Butcher;<br><br>o Meeting Hall;<br><br>o Garage/vehicle repair.<br><br>5.9 The Map below is taken from the Olveston Sustainable Access Profile and demonstrates that the site is within 800m walking and cycling distance from all of the services and facilities listed above.<br><br>Please see the attached Document for the Map which is referenced above.<br><br>*Figure 1: Map Showing Distance to Services and Facilities: South Gloucestershire Council's Sustainable Access Profile for Olveston (February 2018)*<br><br>5.10 It does not benefit from any Health Facilities, a Secondary School or major employers within the required walking and cycling catchment areas. However, the Sustainable Access Profile states that there is considered to be Public Transport with suitably frequent and timed connections to Thornbury on weekdays and weekends and also Cribbs Causeway at the weekend. This facilitates sustainable access to key services and facilities lacking in Olveston itself.<br><br>5.11 It is therefore felt that it is suitable to deliver residential development and can make a significant contribution to boosting housing supply in South Gloucestershire.<br><br>**Transport and Access:**<br><br>5.12 The proposed site is currently accessed from the West via Aust Road. Aust Road becomes The Street just to the South of the Allotments, which is the main road through Olveston Village. In terms of sustainable means of transport, the bus stops are located approximately an 8 minute walk from the site, to the Southern end of the village.<br><br>5.13 The Olveston Sustainable Access Profile also assessed the Public Transport services from Olveston to surrounding key destinations. The times below are taken from the Stagecoach website. The No. 622 bus has at least one bus arriving before 9am and returning after 5pm on weekdays:<br><br>o To Thornbury: (13 minutes).<br><br>o To Alveston: (5 minutes).<br><br>o To Cribbs Causeway: (24 minutes).<br><br>o To Yate: (46 minutes).<br><br>o To Chipping Sodbury: (58 minutes).<br><br>5.14 On Saturdays the No. 622 provides the following bus services from Olveston and has at least one bus arriving before midday and returning after 3pm:<br><br>o To Thornbury: (11 minutes).<br><br>o To Alveston: (5 minutes).<br><br>o To Cribbs Causeway: (24 minutes).<br><br>o To Yate: (46 minutes).<br><br>o To Chipping Sodbury: (58 minutes).<br><br>5.15 The No. 411 bus also provides a service from Olveston to Marlwood School in Alveston and the Castle School and Castle Upper School in Thornbury, once in the morning and returning in the afternoon in line with the School day.<br><br>5.16 The site is within walking and cycling distance of a limited number of services and facilities. The existing Public Transport network from Olveston provides frequent bus services to key destinations within the wider area. |
| **Attached documents** | Newland Homes - DLP Planning Ltd (Mr. Paul Jobson).pdf (1.1 MB) |

| | |
|---|---|
| **Respondent Name** | Hall and Woodhouse |
| **Comment ID** | 16757633/2166 |

| | |
|---|---|
| **Document Part Name** | Question 21 - Sustainable Access Profiles |
| **Comment** | **Accessibility: Warmley:**<br><br>4.12 The South Gloucestershire Sustainable Access Profile for Warmley (February 2018) shows that Warmley has access to the following:<br><br>- 4 Public Houses within a walkable 800m;<br><br>- 3 major employers and 5 safeguarded employment areas within a 2km walk or cycle;<br><br>- An additional 5 major employers and 7 safeguarded employment areas and 2 Town Centres (Kingswood and Longwell Green Retail Park)with a 5,600m cycling distance;<br><br>- A number of Primary Schools and Secondary School within walking distance;<br><br>- 4 local convenience stores and a supermarket within the appropriate 1,200 m walking and cycling distance;<br><br>- Bus services to Bristol and Bath City Centres, Keynsham and to other parts of the Bristol urban area.<br><br>4.13 In addition, we note that Warmley also has the following – which are not currently recognised in the Sustainable Access Profile:<br><br>- Post Office;<br><br>- Petrol station;<br><br>- Pharmacy;<br><br>- Hairdressers; and<br><br>- Community centre.<br><br>4.14 This demonstrates that Warmley is a sustainable location for growth, served by Public Transport, well related to key centres of employment, and with everyday conveniences, as well as Primary and Secondary Education within walking distance. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Newland Homes |
| **Comment ID** | 2857441/2179 |
| **Document Part Name** | Question 21 - Sustainable Access Profiles |
| **Comment** | **Sustainability:**<br><br>4.8 The sustainability of Thornbury has been assessed in the Sustainable Access Profiles produced by the Council in February 2018 as part of the SGLP process. The Thornbury Sustainable Access Profile considers the town to have high level of sustainable access to a range of services and facilities as it contains the following:<br><br>o Town Centre providing multiple retail facilities and a large number of specialist food stores;<br><br>o 3 major employers;<br><br>o Thornbury Industrial Estate which is a safeguarded employment area;<br><br>o 2 supermarkets – Tesco and Aldi;<br><br>o 7 Primary Schools;<br>o 2 Secondary Schools;<br><br>o 3 Community Centres;<br><br>o Thornbury Library;<br><br>o 2 Post Offices;<br><br>o 4 Pubs;<br><br>o 3 GP Surgeries; |

o 2 Dentists;

o 3 Pharmacies.

4.9 The Profile also highlights that Thornbury's key services and facilities are predominantly located around the Town Centre which is to the South-West of the settlement. Land West of Bristol Road is located adjacent to the South-West of Thornbury's Settlement Boundary and, as such, is located very close to Thornbury Town Centre and said services and facilities.

4.10 The Map below is taken from the Thornbury Sustainable Access Profile and demonstrates that the site is easily within 800m walking and cycling distance from all necessary services and facilities.

*Figure 2: Map Showing Distance to Services and Facilities: South Gloucestershire Council's Sustainable Access Profile for Thornbury (February 2018)*

Please see the attached Document for Figure 2 which is referenced above.

4.11 The site is also located well within the maximum walking and cycle distances specified for Primary Schools and Secondary Schools (2 miles and 3 miles respectively) as demonstrated by the Map below.

*Figure 3: Map Showing Distance to Primary and Secondary Schools: South Gloucestershire Council's Sustainable Access Profile for Thornbury (February 2018)*

Please see the attached Document for Figure 3 which is referenced above.

4.12 It can be seen from the evidence above that the site is located in a highly sustainable location. It is therefore felt that it is suitable to deliver residential development and can make a significant contribution to boosting housing supply in South Gloucestershire.

**Transport and Access:**

4.13 The proposed site is currently accessed from the South via the road to Thornbury Golf Club. This road joins with Bristol Road to the South-East of the site. There is potential to provide a new access into the site directly from Bristol Road (as confirmed by a pervious Pre-application Enquiry for the site).

4.14 In terms of sustainable means of transport, there is a bus stop immediately to the East of the site on Bristol Road, near to the access to the site. There is another bus stop on the opposite side of Bristol Road adjacent to the Thornbury Leisure Centre access point.

4.15 The Thornbury Sustainable Access Profile also assessed the Public Transport services from Thornbury to surrounding key destinations and the time taken to reach said destinations. During the week the following bus services run from Thornbury, those services highlighted red have at least one bus arriving before 9am and returning after 5pm:

o To Filton: (**No. 79** – 31 minutes) (**No. 78** – 42 minutes).

o To Bradley Stoke: (No. 73, No. 79 – 40 minutes) (**No. 77** – 31 minutes) (No. 78, No. 73 – 48 minutes).

o To Patchway: (**No. 79** – 18 minutes) (**No. 78** – 19 minutes) (No. 77 – 24 minutes).

o To Cribbs Causeway: (**No. 78** – 30 minutes) (**No. 622** – 42 minutes) (No. 79, No. 73 – 47 minutes) (No. 79, No. 75 – 47 minutes) (No. 77, No. 73 – 47 minutes).

o To Yate: (**No. 622** – 33 minutes).

4.16 During the weekends the following bus services run from Thornbury. Those services highlighted red have at least one bus arriving before midday and returning after 3pm:

o To Filton: (**No.7 9** – 31 minutes) (**No. 78** – 42 minutes) (No. 77 – 54 minutes).

o To Bradley Stoke: (No. 73, No. 79 – 40 minutes) (**No. 77** – 31 minutes) (No. 78, No. 73 – 48 minutes).

o To Patchway: (**No. 79** – 18 minutes) (**No. 78** – 18 minutes) (No. 77 – 24 minutes).

o To Cribbs Causeway: (**No. 78** – 30 minutes) (**No. 622** – 42 minutes) (No. 79, No. 73 – 40 minutes) (No. 79, No. 75 – 37 minutes) (No. 77, No. 73 – 53 minutes).

o To Yate: (**No. 622** – 33 minutes).

4.17 The site is well located within walking and cycling distance of all services and facilities. A few larger employers are based in Thornbury but it is commonly found that not everyone chooses to, or can indeed, live where they work. If necessary to travel, the existing Public Transport Network

| | |
|---|---|
| | from Thornbury provides frequent bus services to key destinations within the wider area. Land West of Bristol Road is well placed to utilise existing bus services that run along Bristol Road into and out of Thornbury. |
| **Attached documents** | SGC_NLP_Feb 2018_Consultation Doc Representations_A5097P_Land West of Bristol Road Thornbury_Newland Homes.pdf (1.4 MB) |

| | |
|---|---|
| **Respondent Name** | Ashfield Land |
| **Comment ID** | 16658689/2274 |
| **Document Part Name** | Question 21 - Sustainable Access Profiles |
| **Comment** | 4.14 We also have concerns about the sustainability of some of the other locations being considered for non-strategic development. These concerns are primarily related to some of the locations' ability to meet favourably with the requirements of the NPPF, particularly Paragraph 38 which states: *'Where practical, particularly within large-scale developments, key facilities such as Primary Schools and local shops should be located within walking distance of most properties.'*<br><br>4.15 The Manual for Streets (MFS) sets out guidance on what might be considered walkable:<br><br>*'Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes (up to about 800m) walking distance of residential areas which residents may access comfortably on foot. However, this is not an upper limit and PPS13 states that walking offers the greatest potential to replace short car trips, particularly those under 2km.'*<br><br>4.16 The Council has produced a series of assessments entitled 'Sustainable Access Profiles' of various potential geographic areas that it has assessed as possible locations for housing growth. These specific assessments follow the 'Sustainable Access Profiles Methodology' (February 2018) Paper that forms part of the NLP Evidence Base.<br><br>4.17 At Page 9 this Methodology sets out the types of key facilities that need to be considered when making an assessment on whether a location is or is not sustainable in accessibility terms. We generally agree that the facilities outlined are those that would be required by new residents on a 'day to day' basis.<br><br>4.18 Our concerns primarily relate to the criteria against which accessibility is assessed. For the most part the use of the 800m, 1,200m and 2,000m isochrones follows the MFS and the Chartered Institute for Highways and Transportation's Guidelines (CIHTG), which is appropriate.<br><br>4.19 However, in respect to Schools, a 2 mile and 3-mile radius is used for Primary and Secondary Schools respectively. The justification for this refers to the Education Act 1996 which sets the maximum "statutory walking distance" to School and throughout these assessments it is apparent that SGC are using this radius to evaluate a settlement's accessibility to these key educational facilities. We do not consider such an approach to be appropriate; whilst the Education Act guidance might be relevant to educational professionals when assessing the location of new Schools, it is out-of-date in respect to Planning Policy. The NPPF is the relevant tool which should be read alongside other Guidance Documents such as the MFS and CIHTG, and in our view it is more important to assess access to Primary Schools against the 800m ideal walking distance because parents are most likely to walk their smaller children to School and they will be less likely to be able to cover larger distances on foot. Secondary School children are more likely to be able to walk or cycle longer distances unaccompanied and therefore a 2,000m radius is more likely to be appropriate. In light of this, we consider that SGC should reassess the accessibility of settlements against the MFS and CIHTG instead of the 2 and 3 miles' radii used.<br><br>4.20 Furthermore, one of the main generators of trips is commuting to work; therefore, the NLP should be looking at NSDLs that are well located to existing employment areas where the opportunity to either walk, cycle or travel by Public Transport exists.<br><br>4.21 The JSP acknowledges (at Page 10) that residents of the WoE are more likely to commute to work via cycling and walking than the UK average. This is presented in Table 5 below.<br><br>*Table 5: Modes of Commuting in WOE compared to National Average (Source 2011 Census)*<br><br>Please see the attached Document for Table 5 which is referenced above.<br><br>4.22 The Spatial Strategy for the NLP therefore should focus on areas for non-strategic growth in existing settlements, where there is the opportunity to harness walking and cycling as modes of travel to work rather than just Public Transport links. Focus should be placed on these methods as these are by far the most popular means of non-car travel and in turn this raises our concerns regarding some of the locations being considered in the NLP Consultation for development.<br><br>4.23 We believe that it would be common ground between us and SGC that the best way to address unsustainable travel patterns is to encourage residents of the area to walk and cycle as a priority and then utilise Public Transport, all opposed to the private motor car – such an approach is often referred to as 'modal shift.' Unfortunately, we do not consider that many of the options being considered for non-strategic growth will help achieve this priority.<br><br>5.0 **HANHAM:**<br><br>5.1 As we have set out, we support the Local Plan's investigation into Hanham as a settlement for non-strategic growth to meet the needs of the South Gloucestershire area, set out in part of Option 2 of the Consultation Draft and within the HELAA Methodology. Within the HELAA Methodology it is apparent to us that South of Hanham is being explored as the primary option for expansion, as shown below in Figure 3 (Option No. 13):<br><br>Figure 3. Extract of the new Local Plan options for non-strategic growth |

| | |
|---|---|
| | Please see the attached Document for Figure 3 which is referenced above.<br><br>5.2 A Sustainable Access Profile has been completed for each of the areas identified for potential non-strategic growth and again this seems to indicate that Land South of Hanham is being considered for development. Relevant extracts of this Sustainable Access Profile can be found in Appendix B which demonstrates the area's accessibility credentials. We will go on to discuss these credentials and the accessibility of Hanham as a settlement suitable for non-strategic scale housing development, such as at Land West of Castle Farm Road.<br><br>5.3 There are a number of key facilities within Hanham including a number of banks, a Library, community centre, a Post Office, a Lidl store, and a number of High Street businesses. There are other community facilities including an Infant School, Junior School, Secondary School, and a local GP Surgery. The Sustainable Access Profile for Hanham confirms that a significant number of facilities are available within the ideal 800m walking distance (set out in the Manual for Streets) and that the majority of facilities are available within the upper 2,000m walking limit. In this respect Hanham is one of the best performing, if not the best, location being considered by SGC to accommodate non-strategic housing growth.<br><br>5.4 In addition to this there are a significant number of Public Transport links from Hanham, including bus services to Kingswood, UWE, Bristol Parkway, Keynsham, Bristol City Centre, Bath City Centre, Longwell Green, and Lawrence Hill. This includes regular services (approximately every 30 – 60 minutes Mondays to Saturdays) with some services running on Saturday evenings and Sundays (every 60 minutes). As such, there are existing available Public Transport links to Hanham which allow residents to maximise the use of this mode of transport over the private motor car.<br><br>5.5 The excellent transport links from Hanham means that easy access to extensive employment areas is available via Public Transport. Employment areas available within a walking or cycling distance include Gallagher Retail Park, Brislington Industrial Estate, the main urban area of Bristol, and Keynsham.<br><br>5.6 As such, in light of the available existing facilities within Hanham, the excellent transport links via all modes of travel, and available employment opportunities in close proximity to this area, we consider that it is a suitable location for non-strategic development and the allocation of land adjacent to the urban area should proceed as soon as practically possible. This will allow housing supply to be delivered in this highly sustainable location and will assist in meeting the challenging housing requirements that apply to both SGC and the JSP area. |
| **Attached documents** | Ashfield Land - Grass Roots Planning Ltd (Mr. Matthew Kendrick).pdf (30.0 MB) |

| | |
|---|---|
| **Respondent Name** | Redrow Homes South West, Julia Wallington, Debra Turner, Andrew Williams, Chr... |
| **Comment ID** | 20167105/2351 |
| **Document Part Name** | Question 21 - Sustainable Access Profiles |
| **Comment** | Please see attached Representations Document. |
| **Attached documents** | Redrow Homes South West and Others - Grass Roots Planning (Mr. Matthew Kendrick).pdf (7.2 MB) |

| | |
|---|---|
| **Respondent Name** | Marshfield Parish Council |
| **Comment ID** | 1398017/917 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD220 |
| **Attached documents** | LGSD220.pdf (813 KB) |

| | |
|---|---|
| **Respondent Name** | Arthur & Rita Lees |
| **Comment ID** | 19839457/918 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD213<br><br>Dear Sirs,<br><br>We have just become aware of the Consultation regarding LGD213 and wish to express our views. Although we do not live in the immediate vicinity of the Land at St. Mary's Church, we are residents of and we fully support the retention of the Protected Green Spaces Policy concerning this land, as designated in and before, 2015. The Church Orchard complements the historic location of the Grade 1 Listed St. Mary's Church (English Heritage I.D. 1129438) and any change in the status of the Protected Green Space would adversely impact upon it. The Land at St. Mary's Church is also a haven for wildlife and therefore enhances the surrounding natural environment.<br><br>We earnestly hope that South Gloucestershire Council will strongly support the retention of this Protected Local Green Space, within its AONB status. By doing so, it will ensure its conservation for present and future generations to enjoy. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Stewart Redman |

| | |
|---|---|
| **Comment ID** | 19840001/919 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD213<br><br>Dear Sir/Madam,<br><br>I am writing to Comment on the Land at St. Mary's Church.<br><br>Space Code - LGSD213:<br><br>As the name clearly suggested the Land at St. Mary's Church is a historic site and a vital part of the atmosphere of Marshfield. This area is known as the "Lungs" of the village. It is a central space where the flora and fauna of the village can breathe.<br><br>Multiple species of birds rely on this space including a large murder of crows, woodpeckers and bats. As well as animal species, newts also rely on this space.<br><br>This is an integral part of this corner of the Cotswold Area of Outstanding Natural Beauty both to the regular visitors to the ancient Church and viewed from the air by balloonists, gliders and planes (from the local airfields).<br><br>Building on this most beautiful site would ruin this corner of Marshfield for residents and visitors alike for generations to come. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Peter Bridgens |
| **Comment ID** | 19843553/921 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD212; LGSD213; LGSD214; LGSD216; LGSD217; LGSD220; LGSD223; and LGSD1213<br><br>To whom it may concern:<br><br>I object to the possible reclassification of Green Spaces in Marshfield and request that the status of all the Local Green Spaces in Marshfield be re-instated to their pre 2015 status, that is the 2004 status (then called 'Protected Open Space').<br><br>The list of Local Green Spaces that are affected are as follows:<br><br>LGSD212 Land at Community Centre;<br><br>LGSD213 Land Adjacent to St. Mary's;<br><br>LGSD214 Land at Weir Farm;<br><br>LGSD216 Land at Frogmore House;<br><br>LGSD217 Land of East End;<br><br>LGSD220 Withymead Playing Fields;<br><br>LGSD223 Common;<br><br>LGSD1213 Land Between A420 Georges Lane and High Street. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Anna Webster |
| **Comment ID** | 19843617/923 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD177 |
| **Attached documents** | LGSD177.pdf (409 KB) |

| | |
|---|---|
| **Respondent Name** | Jane Driver |
| **Comment ID** | 5134785/924 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD177 |
| **Attached documents** | LGSD177.pdf (409 KB) |

| | |
|---|---|
| **Respondent Name** | D. E. Colbourne |
| **Comment ID** | 14509761/925 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD212<br><br>Sirs,<br><br>You wrote to me on 12th March regarding the new/revised Local Green Spaces Policy, and in particular the status of:<br><br>**LGSD212 - Land at the Community Centre, Marshfield -** which is now labelled **"not currently designated."**<br><br>The letter also states that:<br><br>"Comments on the Local Green Space Guidance Note and Comments on specific spaces can be returned to: Email: planningpolicy@southglos.gov.uk " (by 30th April).<br><br>I was amazed and alarmed at this "not currently designated" classification, and wish to object in the strongest possible terms to the change of designation for this particular area – previously designated a **"Protected Open Space" (Policy L6)** within the **Marshfield Conservation Area**.<br><br>As a resident of ; as a regular user of the Community Centre; and as a member of the Marshfield Community Centre Association Committee, I wish to register this objection, and request that this area should as soon as possible be designated again as a **Local Green Space**. The Community Centre is used by a large number of organisations and individuals, and this area is used regularly for community events, for example the May Fair, the annual Marshfield Boules competition, occasional religious gatherings - and also regularly by many young users of the Community Centre to "let off steam" (very necessary at times). I therefore cannot understand why the status of this land has been changed, and would request that this decision is reviewed – and reversed – before the Local Plan is finalised. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Sarah Hardcastle - Friends of Ridge Wood |
| **Comment ID** | 10404481/926 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD930 |
| **Attached documents** | LGSD930.pdf (416 KB) |

| | |
|---|---|
| **Respondent Name** | Paul Kynaston |
| **Comment ID** | 12514465/956 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD749 |
| **Attached documents** | LGSD749.pdf (804 KB) |

| | |
|---|---|
| **Respondent Name** | Paul Kynaston |

| | |
|---|---|
| **Comment ID** | 12514465/959 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD132 |
| **Attached documents** | LGSD132.pdf (901 KB) |

| | |
|---|---|
| **Respondent Name** | Andrew Gammie |
| **Comment ID** | 16550049/985 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | Dear Sir/Madam,<br><br>It has been brought to my attention that some designated green space in Marshfield has had its status changed, and the Conservation Area is under review.<br><br>I am not aware that these matters have been sufficiently notified to residents here, even those who receive email updates. This is a huge issue for the community and must be openly considered, not passively changed or quietly approved.<br><br>Please can you assure me that due public process will be followed and that no reduction in this historic Conservation Area is being considered. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Brian Carter |
| **Comment ID** | 19837057/987 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD1185<br><br>Dear Sir,<br><br>Re: South Gloucestershire Local Plan 2018 - 36 February 2018 Consultation Document - Response concerning the Local Plan for Siston Commons.<br><br>I to Siston Common and enjoy the facility of being able to regularly walk from over the Commons through Goose Green. I also belong to the U3A Walking Group and have walked from the Siston Parish footpath through Webbs Heath/Bridgeyate Commons to the Warmley Forest.<br><br>I was horrified when I discovered that these areas were no longer designated as Local Green Spaces and were available for development. I do not understand and disagree with the Planning Inspector's findings - we feel that the Commons are not isolated especially Webbs Heath/Bridgeyate Commons which form a connection between Siston Parish and Warmley Forest.<br><br>The Commons are used by many local people for walking and is a valuable asset to the area and feel strongly that this area should remain a green space and not be developed.<br><br>We have lived in the area for years and can see large scale development happening all around us at Emersons Green, Lyde Green, Keynsham and proposed development at Hanham and Frampton Cotterell etc and feel that it is important that some green spaces should be retained for the good of the community, for preservation of wildlife, to provide 'green lungs,' to preserve the heritage of the area.<br><br>Bristol is a good and pleasant place to live partly because it is surrounded by green areas but these areas are now disappearing at an alarming rate to the detriment of the environment.<br><br>About two years ago I went on a Council sponsored walk through the Warmley Forest where the leader pointed out the diversity of the wildlife, flora and fauna this is all now endangered if development takes place.<br><br>Please reconsider any decision to develop the Commons and leave this area as a green space. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Paul Kynaston |
| **Comment ID** | 12514465/992 |

| | |
|---|---|
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD137 |
| **Attached documents** | LGSD137.pdf (709 KB) |

| | |
|---|---|
| **Respondent Name** | Anita Ellin |
| **Comment ID** | 19839425/999 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD213<br><br>Dear Planning Committee,<br><br>Please would you continue to enforce protection on this Plot of the Manor House Orchard and the ancient woodlands behind the Church. I fully appreciate the need for more houses but this is absolutely not the right place. This ancient land which is protected from public access is a haven for wildlife in the village. Surrounding farmland has over the years lost much of the natural hedgerows where wildlife could flourish, but this area in the heart of the village has been kept safe.<br><br>There is a rook colony, many many owls live in the old avenue of trees leading from the Church. Great Crested Newts breed in the woods and then make their way to the old farm pool on Hay Street, which is managed for their protection. Every evening in the Summer bats are flying round local gardens. We have also noticed an increase in our hedgehog population, which as you will appreciate are a struggling species. A couple of families keep bee hives in the woods which again will improve the pollination of local flora.<br><br>I would not have any objections to local farm land being used for building on, as it supports little wildlife. However this small patch of land is too valuable to plough over and develop. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Clifton Homes Ltd |
| **Comment ID** | 16617921/1091 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD580 |
| **Attached documents** | LGSD580.pdf (719 KB) |

| | |
|---|---|
| **Respondent Name** | Sarah & Jeremy Charnaud |
| **Comment ID** | 19884513/1092 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD213<br><br>PSP Plan & redesignation of Local Green Spaces, REF: LGSD213.<br><br>We very strongly consider that Marshfield should retain its areas of Protected Open Spaces. These are the lungs with which the village breathes and without them the village would be a single urban area. Also Hedgehogs are frequently on the land immediately to the East of the Church. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Progold Ltd |
| **Comment ID** | 19737665/1129 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD887 |
| **Attached documents** | LGSD887.pdf (568 KB) |

| | |
|---|---|
| **Respondent Name** | Paul Davis - Persimmon Homes Severn Valley and Taylor Wimpey UK |
| **Comment ID** | 20081857/1284 |
| **Document Part Name** | Question 22 - Local Green Spaces |

| | |
|---|---|
| **Comment** | LGSD050 |
| **Attached documents** | EGSD050.pdf (570 KB) |

| | |
|---|---|
| **Respondent Name** | Bloor Homes South West |
| **Comment ID** | 20096097/1314 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD062 |
| **Attached documents** | EGSD062.pdf (308 KB) |

| | |
|---|---|
| **Respondent Name** | Kathryn and Richard Kneller |
| **Comment ID** | 20068993/1333 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD212; LGSD213; LGSD214; LGSD216; LGSD217; LGSD220; LGSD223; & LGSD1213<br><br>To whom it may concern; I am asking for the status of all the Local Green Spaces in Marshfield to be re-instated to their pre 2015 status, which is the 2004 status, but it was then called Protected Open Space.<br><br>I feel very strongly that as residents, we have not been properly Consulted on the risks and long term effects of such a drastic change.<br><br>the ancient woodland/orchard near St. Mary's and is densely populated by wildlife and rare birds.<br><br>play on the Withymead Playing Fields everyday, they are an essential part of Marshfield community life and as such should be protected.<br><br>To strip our village of its remaining Green Spaces would be catastrophic and once lost, could never be regained.<br><br>We are not against some future Affordable House building for local people but these spaces are most definitely not sites that should be considered as fair game by developers as they each have strong historical, environmental and or social significance.<br><br>The list of Local Green Spaces that are affected are as follows:<br><br>LGSD212 Land at Community Centre;<br><br>LGSD213 Land Adjacent to St. Mary's;<br><br>LGSD214 Land at Weir Farm;<br><br>LGSD216 Land at Frogmore House;<br><br>LGSD217 Land of East End;<br><br>LGSD220 Withymead Playing Fields;<br><br>LGSD223 Common;<br><br>LGSD1213 Land Between A420 Georges Lane and High Street.<br><br>Please let the voices of Marshfield residents be heard. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Jamie Andrews |
| **Comment ID** | 20069025/1334 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD212; LGSD213; LGSD214; LGSD216; LGSD217; LGSD220; LGSD223; & LGSD1213<br><br>Dear South Glos Planning Policy,<br><br>I am asking for the status of all the Local Green Spaces in Marshfield to be re-instated to their pre 2015 status, which is the 2004 status, but it was then called Protected Open Space.<br><br>The list of Local Green Spaces that are affected are as follows:<br><br>LGSD212 Land at Community Centre;<br><br>LGSD213 Land Adjacent to St. Mary's;<br><br>LGSD214 Land at Weir Farm;<br><br>LGSD216 Land at Frogmore House;<br><br>LGSD217 Land of East End;<br><br>LGSD220 Withymead Playing Fields;<br><br>LGSD223 Common;<br><br>LGSD1213 Land Between A420 Georges Lane and High Street. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Cindy Mathews |
| **Comment ID** | 1351841/1335 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD212; LGSD213; LGSD214; LGSD216; LGSD217; LGSD220; LGSD223; & LGSD1213<br><br>I am writing to request that the status of all Local Green Spaces in Marshfield be reinstated to their 2004 status when they were known as Protected Open Spaces.<br><br>The list of Local Green Spaces that are affected are as follows:<br><br>LGSD212 Land at Community Centre;<br><br>LGSD213 Land Adjacent to St. Mary's;<br><br>LGSD214 Land at Weir Farm;<br><br>LGSD216 Land at Frogmore House;<br><br>LGSD217 Land of East End;<br><br>LGSD220 Withymead Playing Fields; |

| | |
|---|---|
| | LGSD223 Common;<br><br>LGSD1213 Land Between A420 Georges Lane and High Street.<br><br>These areas are extremely important historically and ecologically for the village. One only has to look back and consider how the Medieval Burgage Plots were allowed to be built on until recently to see how a village's (and the country's) history is gradually eroded - and all in the name of property development.<br><br>These Spaces will not provide Affordable Housing to reach Government targets as Marshfield's location has elevated house prices and made it very attractive to both executive home developers and buyers from London.<br><br>The latter two will be the only winners in the loss of these Spaces.<br><br>Thank you for your consideration of the above. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Brett Gardner |
| **Comment ID** | 20068961/1336 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD212; LGSD213; LGSD214; LGSD216; LGSD217; LGSD220; LGSD223; & LGSD1213<br><br>I am asking for the status of all the Local Green Spaces in Marshfield to be re-instated to their pre 2015 status, which is the 2004 status, but it was then called Protected Open Space.<br><br>The list of Local Green Spaces that are affected are as follows:<br><br>LGSD212 Land at Community Centre;<br><br>LGSD213 Land Adjacent to St. Mary's;<br><br>LGSD214 Land at Weir Farm;<br><br>LGSD216 Land at Frogmore House;<br><br>LGSD217 Land of East End;<br><br>LGSD220 Withymead Playing Fields;<br><br>LGSD223 Common;<br><br>LGSD1213 Land Between A420 Georges Lane and High Street. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Marshfield Parish Council |
| **Comment ID** | 1398017/1348 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD212 |
| **Attached documents** | LGSD212.pdf (2.2 MB) |

| | |
|---|---|
| **Respondent Name** | Hanham Community Trust (Land at Hanham Sports Ground) |
| **Comment ID** | 20104449/1358 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD729 |
| **Attached documents** | LGSD729.pdf (504 KB) |

| | |
|---|---|
| **Respondent Name** | Louise Jones |
| **Comment ID** | 20060961/1365 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD695<br><br>Space Code: LGSD695<br><br>Space Name : Heathfields Open Space<br><br>Parish: Downend<br><br>Current Status : Designated<br><br>I am writing to confirm that we do NOT wish for the above land to be developed on and for it to remain a Green Space.<br><br>This is in response to a letter we received, dated 12th March, asking for confirmation. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Hanham Community Trust (Land North of Abbots Road) |
| **Comment ID** | 20107489/1375 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD132 |
| **Attached documents** | LGSD132.pdf (501 KB) |

| | |
|---|---|
| **Respondent Name** | Judy Brason |
| **Comment ID** | 14505761/1383 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | South Gloucestershire Local Planning Consultation Document February 2018:<br><br>Marshfield GREEN SPACES:<br><br>Dear Sirs,<br><br>I am writing to ask that you continue to enforce the protection of Marshfield GREEN SPACES. A recent cause for concern is the possible development of the Old Orchard and Wood adjacent to the Manor House, Church Lane. This land is home to ancient a varieties of old trees and should be preserved for the village.<br><br>This is definitely not the site for more housing development, as, apart from the loss of woodland, it will mean more traffic on an already busy road near a School.<br><br>These Green Spaces should have some form of Protected Status, in order to preserve them from future developments. We are losing many of our open spaces in the village of Marshfield and this area needs our protection. Building houses on the Green Belt is not in the interests of our village. Any developer would probably try to get Planning Permission by offering Affordable Housing as an incentive. However, in the various developments around the country, it is quite clear that the actuality of this happening is remote. |

| | |
|---|---|
| | I would urge you to think about this matter very carefully in order to protect our delightful village. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Donna Simmons - Emersons Green Town Council |
| **Comment ID** | 20120577/1384 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD183, LGSD184, LGSD185, LGSD193, LGSD194 and LGSD369<br><br>Dear ,<br><br>Further to your email, Emersons Green Town Council considered the designation of the following Local Spaces at their meeting on 16th April 2018;<br><br>LGSD183, LGSD184, LGSD185, LGSD193, LGSD194 and LGSD369.<br><br>Their Comments are:<br><br>'Members are in support of the designation of LGSD183, LGSD184, LGSD185, LGSD193, LGSD194 and LGSD369 as Local Green Spaces.' |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Robert Willcox |
| **Comment ID** | 11528897/1385 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD260 |
| **Attached documents** | EGSD260.pdf (429 KB) |

| | |
|---|---|
| **Respondent Name** | Hilary Bishop |
| **Comment ID** | 11528737/1386 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD260<br><br>I enclose my Response Form to proposed Green Space designation on land which in Rangeworthy - LGSD260.<br><br>This land has already been put forward under the Call for Sites in the PSP Development Plan November 2017 and Planning Permission will be applied for shortly. This has already been accepted by S. Glos as not suitable for Green Space designation. |
| **Attached documents** | EGSD260.pdf (431 KB) |

| | |
|---|---|
| **Respondent Name** | Rosalyn Pyle |
| **Comment ID** | 2816449/1390 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD1189<br><br>Please accept my Response to the above Consultation. I do not support the sacrifice of Green Belt and common land to satisfy the need for housing development in East Kingswood. The Bristol Bath Green Belt should be preserved at all costs for future generations to treasure.<br><br>Please find attached objection to the failure to acknowledge Webbs Heath Common as Local Green Space. |
| **Attached documents** | EGSD1189.pdf (1.0 MB) |

| | |
|---|---|
| **Respondent Name** | Jacqueline Dalgarno |

| | |
|---|---|
| **Comment ID** | 1410113/1391 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD1189 |
| **Attached documents** | LGSD1189.pdf (666 KB) |

| | |
|---|---|
| **Respondent Name** | Maureen Jackson |
| **Comment ID** | 17756449/1393 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD1189 |
| **Attached documents** | LGSD1189.pdf (547 KB) |

| | |
|---|---|
| **Respondent Name** | Tom Garland |
| **Comment ID** | 19381057/1394 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD1189 |
| **Attached documents** | LGSD1189.pdf (508 KB) |

| | |
|---|---|
| **Respondent Name** | Louise Powell |
| **Comment ID** | 20060897/1396 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD533 |
| **Attached documents** | LGSD533.pdf (1.4 MB) |

| | |
|---|---|
| **Respondent Name** | John Dalgarno |
| **Comment ID** | 1409953/1397 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD1189 |
| **Attached documents** | LGSD1189.pdf (492 KB) |

| | |
|---|---|
| **Respondent Name** | Julie Palmer |
| **Comment ID** | 20061057/1404 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD1189 |
| **Attached documents** | LGSD1189.pdf (67 KB) |

| | |
|---|---|
| **Respondent Name** | ATA Estates (Longwell Green) LLP |
| **Comment ID** | 19740449/1413 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD132 |
| **Attached documents** | LGSD132.pdf (458 KB) |

| | |
|---|---|
| **Respondent Name** | Stewart Waters |
| **Comment ID** | 20068417/1414 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD318 |

| | |
|---|---|
| **Attached documents** | LGSD318.pdf (2.7 MB) |

| | |
|---|---|
| **Respondent Name** | Eric Pullin |
| **Comment ID** | 20068449/1415 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD214 |
| **Attached documents** | LGSD214.pdf (2.4 MB) |

| | |
|---|---|
| **Respondent Name** | Andrew Leney |
| **Comment ID** | 12366081/1416 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD434 |
| **Attached documents** | LGSD434.pdf (2.7 MB) |

| | |
|---|---|
| **Respondent Name** | Nigel Bell |
| **Comment ID** | 20068481/1417 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD062 |
| **Attached documents** | LGSD062.pdf (2.8 MB) |

| | |
|---|---|
| **Respondent Name** | Steven Wall |
| **Comment ID** | 20061121/1430 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD761 |
| **Attached documents** | LGSD761.pdf (541 KB) |

| | |
|---|---|
| **Respondent Name** | Allan Didcott |
| **Comment ID** | 20129857/1432 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD805 |
| **Attached documents** | LGSD805.pdf (2.2 MB) |

| | |
|---|---|
| **Respondent Name** | Roger Montague |
| **Comment ID** | 20061313/1436 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD534<br><br>Please find attached a completed Document containing my Comments on the proposed designation of the area specified as LGSD534. I have also attached a Map highlighting that part of the area in question . |
| **Attached documents** | LGSD534.pdf (1.2 MB) |

| | |
|---|---|
| **Respondent Name** | Brett Harrison - Thornbury Community Composting |
| **Comment ID** | 1457153/1438 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | Vilner Lane Woodland |
| **Attached documents** | Thornbury Community Composting (Mr. Brett Harrison).pdf (505 KB) |

| | |
|---|---|
| **Respondent Name** | Melanie J. Brown |

| | |
|---|---|
| **Comment ID** | 12508705/1449 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD248 |
| **Attached documents** | LGSD248.pdf (1.5 MB) |

| | |
|---|---|
| **Respondent Name** | Richard Hall |
| **Comment ID** | 12508737/1451 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD248 |
| **Attached documents** | LGSD248.pdf (412 KB) |

| | |
|---|---|
| **Respondent Name** | Geoff Millard - Friends of Ridge Wood |
| **Comment ID** | 20132769/1453 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD930 |
| **Attached documents** | LGSD930.pdf (839 KB) |

| | |
|---|---|
| **Respondent Name** | Lesley Reuben - Filton Town Council |
| **Comment ID** | 8064801/1454 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD094 |
| **Attached documents** | LGSD094.pdf (248 KB) |

| | |
|---|---|
| **Respondent Name** | Lesley Reuben - Filton Town Council |
| **Comment ID** | 8064801/1455 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD096 |
| **Attached documents** | LGSD096.pdf (258 KB) |

| | |
|---|---|
| **Respondent Name** | Roger Buncey |
| **Comment ID** | 20060929/1460 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD416 |
| **Attached documents** | LGSD416.pdf (862 KB) |

| | |
|---|---|
| **Respondent Name** | Lesley Reuben - Filton Town Council |
| **Comment ID** | 8064801/1463 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD099 |
| **Attached documents** | LGSD099.pdf (443 KB) |

| | |
|---|---|
| **Respondent Name** | Mr. Mike Kerton - Bloor Homes South West and Mr. Jeremy Sutcliffe - Baratt |
| **Comment ID** | 16646593/1469 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD1189 |
| **Attached documents** | LGSD1189.pdf (402 KB) |

| | |
|---|---|
| **Respondent Name** | Hugh & Ruth Cartwright |
| **Comment ID** | 19628257/1470 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD213<br><br>Dear Sirs,<br><br>I refer to my telephone call with  on Tuesday 24th April 2018 in connection with the above.<br><br>I confirm I have posted the February 2018 Consultation Forms on behalf of myself and my wife to confirm we strongly agree to retain the Local Green Spaces, particularly the tranquil Church Orchard beside the historic St. Mary's Church, as a protected open Local Green Space as originally nominated in, and prior to, 2015.<br><br>We hope the Council will endorse the retention and protection of these special historic ANOB designated Local Green Spaces. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Andrew & Gordon Thomas |
| **Comment ID** | 19730977/1501 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD809 |
| **Attached documents** | EGSD809.pdf (2.8 MB) |

| | |
|---|---|
| **Respondent Name** | Mr. Snell |
| **Comment ID** | 20068545/1502 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD257 |
| **Attached documents** | EGSD257.pdf (2.6 MB) |

| | |
|---|---|
| **Respondent Name** | Executors of Colin Salter Deceased |
| **Comment ID** | 20068577/1510 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD115 |
| **Attached documents** | EGSD115.pdf (2.5 MB) |

| | |
|---|---|
| **Respondent Name** | A. Williams, D. Turner & D. Wallington |
| **Comment ID** | 20068673/1511 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD177 |
| **Attached documents** | EGSD177.pdf (2.7 MB) |

| | |
|---|---|
| **Respondent Name** | Hugh & Ruth Cartwright |
| **Comment ID** | 19628257/1512 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD213 |
| **Attached documents** | EGSD213.pdf (1.4 MB) |

| | |
|---|---|
| **Respondent Name** | D. Trigwell |
| **Comment ID** | 12514049/1517 |
| **Document Part Name** | Question 22 - Local Green Spaces |

| | |
|---|---|
| **Comment** | LGSD213<br><br>Further to my recent telephone conversation with  I attach a copy of the letter that we sent to Marshfield Parish Council regarding the possible reconsideration of  as a Local Green Space.<br><br> indicated that the Local Planning Authority had written to us earlier this year regarding the outcome of the previous consideration of this matter. We do not recall receiving a letter.  Just to confirm that our address is:-<br><br>In the event that the Local Planning Authority does decide to consider this matter again we reserve the right to make further Representations and request that we are kept fully informed. |
| **Attached documents** | EGSD213.pdf (883 KB) |

| | |
|---|---|
| **Respondent Name** | Stephen Allen |
| **Comment ID** | 19454849/1518 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD213<br><br>Dear Sir/Madam,<br><br>Please find attached Response for a space that relates to LGSD213, Land at St. Mary's Church Marshfield.<br><br>I would like to add a little context for the sake of clarity.<br><br>The land that I emailed about here was initially (for many years, as far back as 2004, possibly earlier) included as a protected Green Space, however, on the Map that is linked to the PSP Consultation ending 20th of April 2018, it is not.<br><br>I also attach a Map of the area - see Page 3 outlined in blue.<br><br>I look forward to your Response. |
| **Attached documents** | EGSD213.pdf (2.1 MB) |

| | |
|---|---|
| **Respondent Name** | Esso Petroleum Co Ltd |
| **Comment ID** | 20000609/1521 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD245 and LGSD246 |
| **Attached documents** | EGSD245 and LGSD246.pdf (8.0 MB) |

| | |
|---|---|
| **Respondent Name** | William Abell |
| **Comment ID** | 20068801/1522 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD320 |
| **Attached documents** | EGSD320.pdf (2.7 MB) |

| | |
|---|---|
| **Respondent Name** | Susan Simmons - Westerleigh Parish Council |
| **Comment ID** | 17221409/1524 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD437<br><br>Dear Planning Policy Team, |

| | |
|---|---|
| | Westerleigh Parish Council has always wanted The Pound LGSD437 designated in the PSP/JSP/LP.<br><br>There was a possible question of ownership on a small part of the land, which has now been resolved.<br><br>HM Land Registry has now completed a re-registration under Title GR371511 edition dated 27th March 2018, and registered ALL the land comprising The Pound to .<br><br>Westerleigh Parish Council would therefore like to request once again that this hugely historic piece of Westerleigh Village is given LGSD status in all the new Plans.<br><br>I attach a copy of the revised Title Deed and Plan. Please can you let me know if you need anything further from me. |
| **Attached documents** | The Pound - Revised Title Deed March 2018.pdf (2.0 MB) |

| | |
|---|---|
| **Respondent Name** | Mr. and Mrs. D. E. Thomas |
| **Comment ID** | 20059873/1527 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD130<br><br>We support the designation of LGSD130, Land off Abbots View between Stone Hill View and the Cricket Ground, Hanham Abbots.<br><br>Current status: Designated. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | David Young |
| **Comment ID** | 20060641/1530 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD1189 |
| **Attached documents** | LGSD1189.pdf (498 KB) |

| | |
|---|---|
| **Respondent Name** | Cirsty Marsh |
| **Comment ID** | 20060705/1534 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD886<br><br>Dear Sir/Madam,<br><br>Please find attached my objection to including land in the Local Green Space Designation. |
| **Attached documents** | LGSD886.pdf (452 KB) |

| | |
|---|---|
| **Respondent Name** | Sharon Robbins - Bitton Parish Council |
| **Comment ID** | 803681/1535 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD605<br><br>I can confirm that Bitton Parish Council wishes the spaces at its Redfield Hill and North Street, Oldland Common Allotments sites (LGSD605) to be listed as Local Green Spaces under the Local Plan. |

| | |
|---|---|
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | M. G. Clapp |
| **Comment ID** | 19937281/1536 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD135 |
| **Attached documents** | LGSD135.pdf (1.2 MB) |

| | |
|---|---|
| **Respondent Name** | Colin Dyer |
| **Comment ID** | 20068833/1537 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD177 and LGSD806 |
| **Attached documents** | LGSD177 and LGSD806.pdf (2.7 MB) |

| | |
|---|---|
| **Respondent Name** | Andy Perkins, Pat Rooney, and Gareth Manson |
| **Comment ID** | 20154881/1538 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD413<br><br>On behalf of the 3 Members representing the Woodstock Ward, we are responding to the Local Green Spaces element of the new Local Plan Consultation. It seems unnecessarily bureaucratic to fill in a Form for each and every Green Space, so we trust you will accept the following;<br><br>Woodstock Members would like to reaffirm our continued support for all Green Spaces nominated and approved through the previous PSP process. At this stage we do not have any new Spaces to nominate. The only Space we wish to Comment on is that relating to LGSD413 (Grimsbury Road Playing Fields) where we continue to object to the removal of the 15m buffer zone. We believe this zone should be re-instated (added back in) to the remainder of the designated Space. We have never been made aware of any justification, transport infrastructure or otherwise, for the removal of this 15m buffer. The way in which it was removed previously without any reference to us as the local, democratically elected, Members or as the nominator of the Space in the first place was highly irregular. This zone should, therefore, be re-instated. If, at a later stage, concrete reasons come forward to justify the removal of the 15m buffer, then that will be the time to consider the merits of its removal or not. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Martin Gillian |
| **Comment ID** | 19445537/1539 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD213 |
| **Attached documents** | LGSD213.pdf (1.5 MB) |

| | |
|---|---|
| **Respondent Name** | George Gent |
| **Comment ID** | 19450753/1540 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD988 |
| **Attached documents** | LGSD988.pdf (2.4 MB) |

| | |
|---|---|
| **Respondent Name** | Patrick Gent |
| **Comment ID** | 20068865/1541 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD315 |
| **Attached documents** | LGSD315.pdf (2.4 MB) |

| | |
|---|---|
| **Respondent Name** | Christopher Hall |
| **Comment ID** | 12508673/1542 |

| | |
|---|---|
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD248<br><br>As a joint owner of the Shortwood Play Area I object to the designation as a Local Green Space  The land is currently let to Pucklechurch Parish Council on an annual lease and could be returned to agricultural use. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Peter & Ann Ballard |
| **Comment ID** | 20061569/1543 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD213<br><br>Attention Sth Gloucs Planning.<br><br>We understand that the land to the West of Barn End, Marshfield has been re-designated and is no longer a designated Protected Open Space.<br><br>We are very concerned about this for many reasons.<br><br>1. The woodland is a valuable historical natural resource for living creatures including owls, newts from the pond, woodpeckers and others. It is also visible from all around Marshfield as a major high ground landmark. Thus this land has significant value within Marshfield and forms a natural barrier for Barn End.<br><br>2. We fear that since the re-designation, the woodland could be felled to make way for housing. Besides the destruction of the woodland, Barn End is not suitable for the construction traffic that have to pass along it for many months if not years. Barn End is narrow with restrictive parking and totally unsuitable as a through route.<br><br>We are concerned that the re-designation of the woodland seems to have happened without Consultation and it was only by chance that this Consultation was found.<br><br>We hope that you reconsider the re-designation and designate it back to protected open space so as to protect the woodland and the neighbourhood. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Steve Shield - Stoke Gifford Parish Council |
| **Comment ID** | 10277281/1544 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD944 and LGSD946<br><br>Please see below Comments in order for Meade Park and Forty Acres in Stoke Gifford to be reconsidered for Green Space Designation:-<br><br>**Meade Park (LGSD944):**<br><br>Consideration of Local Green Space Designation is now requested for this Park given the withdrawal of the Hatchet Road, Cribbs - Patchway MetroBus Extension Project.<br><br>**Forty Acres and Royal Park (LGSD946):**<br><br>Consideration of Local Green Space Designation is now requested for this open Green Space given the withdrawal of the Hatchet Road, Cribbs - Patchway MetroBus Extension Project.<br><br>Since our original comprehensive Submission and justification to protect our local Green Spaces in Stoke Gifford, recent developments have brought forth a wealth of research demonstrating the parlous state of our natural world which underlines in very strong terms the need to protect areas such as Forty Acres, Royal Park and Meade Park, which function to provide an enormously important community resource, coupled with an even more important centre of natural capital, with vital connectivity to other areas. |

| | |
|---|---|
| | The previous data submitted demonstrated the importance of retaining open green space, and these spaces in particular for their properties of flood control, Carbon storage, air quality enhancement, people, Biodiversity, health and wellbeing, education and historical importance. These areas provide recreational value and space for reflection and calm, as well as assist with community cohesion, alongside playing an important role in conservation.<br><br>The Parish Council support the need for both areas to be reconsidered for Green Space Designation in their entirety on behalf of the wider local community. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Peter Isaac |
| **Comment ID** | 11350113/1545 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD280 |
| **Attached documents** | LGSD280.pdf (1.1 MB) |

| | |
|---|---|
| **Respondent Name** | Kenneth Cook |
| **Comment ID** | 20155681/1546 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD213<br><br>Dear ,<br><br>We realise this is a late communication but have been working for the last months and were shocked to discover, on , that the previous and long protected designation of the areas in LGSD213 had been removed are now in question.<br><br>A large section of this land is – see Maps in attachment along with our Comments and reasoning as to why this rare area of unspoilt land should be reinstated as Local Green Space and have the continued protection it warrants.<br><br>I hope you will re-examine this designation seriously. |
| **Attached documents** | LGSD213.pdf (1.5 MB) |

| | |
|---|---|
| **Respondent Name** | Linda McManus - Marshfield Parish Council |
| **Comment ID** | 379777/1547 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD213 |
| **Attached documents** | LGSD213.pdf (3.7 MB) |

| | |
|---|---|
| **Respondent Name** | MAP Webb TD |
| **Comment ID** | 20069057/1548 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | I am writing to express my concern over what I believe are intended changes to nominated or designated protected Green Spaces within the village of Marshfield. I further understand that there is a Consultation due and I would like to express the importance of the fullest engagement of the community in that?<br><br>If there is even the slightest possibility of removing protection on this land, I would urge you to think extremely carefully of the environmental and ecological impacts. These are too important to be restricted for information or communication to those registered for Planning Notifications.<br><br>The designated and no, images Spaces contain a number of important populations, including protected species of newts and bats. In addition there are significant numbers of owls and other native fauna. Our local hedgehog population is recovering and a number of interesting bird species have made permanent or passage homes here, in these areas.<br><br>It is essential that the consideration of any change is not limited to building or development issues. The village relies on these green areas to maintain a quality of life and of wildlife. Consultation must be open and freely accessible. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Helen Ratcliffe |
| **Comment ID** | 14399809/1550 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | Marshfield GREEN SPACES<br><br>To whom it may concern,<br><br>It has been brought to our attention that some areas within the Marshfield boundary have lost their GREEN SPACE status and were removed from the Plan in 2004?<br><br>Please would you continue to enforce protection of Marshfield GREEN SPACES, including the Old Orchard and Wood on the Plot by the Manor House, as this land is ancient (and a habitat for wildlife including a rookery) and should be preserved.<br><br>The village was not made aware of their loss of status and want that re-instated rather than seen as potential development sites when others are more suitable.<br><br>I look forward to your response. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Irene Hall |
| **Comment ID** | 14505409/1551 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | Marshfield GREEN SPACES<br><br>Dear Sir,<br><br>Please would you continue to enforce protection of Marshfield GREEN SPACES, including the Old Orchard and Wood on the Plot by the Manor House, as this land is ancient and should be preserved.<br><br>This is definitely not the site for more housing as no way will they be affordable. Marshfield doesn't need any more Million Pound houses!<br><br>These Green Spaces should have Protected Status or the equivalent of, to protect them from Greedy Developers, who only have their own interests at heart.<br><br>This idea of Affordable Housing is just a guise to build on GREEN BELT, as the final product is still not affordable for the average person. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Alan Miller |
| **Comment ID** | 11350049/1552 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD280 |
| **Attached documents** | LGSD280.pdf (1.1 MB) |

| | |
|---|---|
| **Respondent Name** | Roger Hutchinson and Adam Monk |
| **Comment ID** | 17348929/1553 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | In addition to the Submission to the Local Plan Consultation on Green Spaces we would like to give our support to the Submissions of Filton Town Council in particular that of the Northville Millennium Green which seems to us a Space that fits the criteria fully. Bought by the Town Council from the ex Avon County Council, who owned it as School Playing Fields, to protect it as public open space it received a major Grant from the Countryside Commission and was designated as a Millennium Green in 2000. Extensive planning took place at the time with paths being laid one being a large circle much used by joggers, which was cut by a path across the field lined at each end with lime trees. The path follows the line that was followed by coffin bearers taking the deceased from Horfield to the Church at Filton. 18 years later much of the groups of trees and shrubs have grown and matured as have the limes and it is now a very attractive green area used by a variety of members of the community including dog |

| | |
|---|---|
| | walkers, joggers, people of all ages and groups playing casual sport, picnics and at times small fairs and gatherings. Whilst the designation of the Millennium Commission is protection, cover by the Local Plan would also be very welcome. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Rockfield Farms Limited (RFL) |
| **Comment ID** | 20069217/1591 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD1149 |
| **Attached documents** | EGSD1149.pdf (525 KB) |

| | |
|---|---|
| **Respondent Name** | Stuart Howes |
| **Comment ID** | 12400289/1603 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD258 |
| **Attached documents** | EGSD258.pdf (548 KB) |

| | |
|---|---|
| **Respondent Name** | Paul Davis - Persimmon Homes Severn Valley and Taylor Wimpey UK |
| **Comment ID** | 20081857/1604 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD053 |
| **Attached documents** | EGSD053.pdf (584 KB) |

| | |
|---|---|
| **Respondent Name** | Redrow Homes |
| **Comment ID** | 20166177/1628 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD959 |
| **Attached documents** | EGSD959.pdf (1.3 MB) |

| | |
|---|---|
| **Respondent Name** | Redrow Homes South West, Julia Wallington, Debra Turner, Andrew Williams, Chr... |
| **Comment ID** | 20167105/1629 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD177 |
| **Attached documents** | EGSD177.pdf (679 KB) |

| | |
|---|---|
| **Respondent Name** | Stuart Howes |
| **Comment ID** | 12400289/1630 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD265 |
| **Attached documents** | EGSD265.pdf (518 KB) |

| | |
|---|---|
| **Respondent Name** | Lesley Reuben - Filton Town Council |
| **Comment ID** | 8064801/1631 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD098 |
| **Attached documents** | EGSD098.pdf (283 KB) |

| | |
|---|---|
| **Respondent Name** | Lesley Reuben - Filton Town Council |

| | |
|---|---|
| **Comment ID** | 8064801/1632 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | Shield Road Playing Field |
| **Attached documents** | Filton Town Council (Mrs. Lesley Reuben).pdf (158 KB) |

| | |
|---|---|
| **Respondent Name** | Lesley Reuben - Filton Town Council |
| **Comment ID** | 8064801/1633 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD711 |
| **Attached documents** | LGSD711.pdf (220 KB) |

| | |
|---|---|
| **Respondent Name** | Lesley Reuben - Filton Town Council |
| **Comment ID** | 8064801/1634 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD1212 |
| **Attached documents** | LGSD1212.pdf (317 KB) |

| | |
|---|---|
| **Respondent Name** | Lesley Reuben - Filton Town Council |
| **Comment ID** | 8064801/1635 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD097 |
| **Attached documents** | LGSD097.pdf (278 KB) |

| | |
|---|---|
| **Respondent Name** | Lesley Reuben - Filton Town Council |
| **Comment ID** | 8064801/1636 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD712 |
| **Attached documents** | LGSD712.pdf (288 KB) |

| | |
|---|---|
| **Respondent Name** | Roger and Ann Ward |
| **Comment ID** | 20070049/1637 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD592 |
| **Attached documents** | LGSD592.pdf (3.0 MB) |

| | |
|---|---|
| **Respondent Name** | Richard Bull - Environment Agency |
| **Comment ID** | 11527745/1638 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD424<br><br>Thank you for referring the above Consultation, which was received on 5th June 2018.<br><br>I can confirm that the Environment Agency has no ownership at LGSD424 - Ochre Works however the River Boyd runs through this area and is designated as a main river.<br><br>The land adjoining the river is also Flood Zone 3. This is an area with a high probability of flooding, where the indicative annual probability of flooding is 1 in 100 years or less from river sources (i.e. it has a 1% or greater chance of flooding in any given year). |

| | |
|---|---|
| | We would have no objection for this land to be designated as a Local Green Space.<br><br>Please note that a permit under the Environmental Permitting (England and Wales) Regulations 2010 from the Environment Agency may be required for any works or structures, in, under, over or within eight metres of the top of the bank of the River Boyd, designated a 'main river.' This was formerly called a Flood Defence Consent. Some activities are also now excluded or exempt. A Permit is separate to and in addition to any Planning Permission granted. Further details and guidance are available on the GOV.UK website:<br><br>https://www.gov.uk/guidance/flood-risk-activities-environmental-permits.<br><br>If you wish to discuss any of the above I can be contacted on the number below.<br><br>Please quote the Agency's Reference on any future correspondence regarding this matter. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Taylor Wimpey |
| **Comment ID** | 20068353/1660 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD209 |
| **Attached documents** | Taylor Wimpey - Turley (Andrew Ross).pdf (314 KB)<br>EGSD209.pdf (479 KB) |

| | |
|---|---|
| **Respondent Name** | Taylor Wimpey |
| **Comment ID** | 20068353/1661 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD202 |
| **Attached documents** | Taylor Wimpey - Turley (Andrew Ross).pdf (314 KB)<br>EGSD202.pdf (484 KB) |

| | |
|---|---|
| **Respondent Name** | Taylor Wimpey |
| **Comment ID** | 20068353/1662 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD1171 |
| **Attached documents** | Taylor Wimpey - Turley (Andrew Ross).pdf (314 KB)<br>EGSD1171.pdf (480 KB) |

| | |
|---|---|
| **Respondent Name** | Chris Kembrey - W. C. H. Kembrey & Son Limited |
| **Comment ID** | 12495873/1664 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD761 |
| **Attached documents** | EGSD761.pdf (1.6 MB) |

| | |
|---|---|
| **Respondent Name** | Lesley Reuben - Filton Town Council |
| **Comment ID** | 8064801/1666 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD092 & LGSD094 |
| **Attached documents** | FW South Gloucestershire Local Plan Consultation - Local Green Spaces.pdf (177 KB)<br>EGSD092 Current Boundary PDF.pdf (1.1 MB) |

| | |
|---|---|
| **Respondent Name** | Quentin & Carol Woodley |
| **Comment ID** | 12514081/1667 |
| **Document Part Name** | Question 22 - Local Green Spaces |

| | |
|---|---|
| **Comment** | LGSD214<br><br>Dear Sirs,<br><br>We have been passed a letter (dated 13th March 2018) by one of our neighbours concerning further Consultation on the issue of public Green Spaces in Marshfield.<br><br>of the portion of the potential public Green Space covered in the letter (LGSD214) and are very concerned that we have not been written to directly about this matter.<br><br>Please can you ensure that in future all formal correspondence relating to this piece of land in the context of public Green Spaces or any other Planning matter is sent to us directly at the following address:<br><br>**Our position:**<br><br>When this process first started in 2015 we submitted a formal Objection to the proposal to designate (and indeed the rest of LGSD214 which also includes a working farmyard and a vacant plot of land that was once part of but was sold by over years ago both of which are in separate ownership) as a public Green Space. I am attaching this Submission and associated Diagram for your information.<br><br>Having revisited it again, we stand by the points we made. We cannot see any justification for making a public Green Space for the reasons we set out in our 2015 Submission and object strongly to this proposal.<br><br>We remain confused, however, as to where the original proposal came from that (and the farmyard etc) become a public Green Space. If anyone is continuing to make a case for such a designation we would like to be informed of the central points of their case so that we can respond accordingly. Please can you confirm that this will happen? We note in passing here (though we explored this more fully in our attached 2015 Submission) that the current justification on your website for being a public Green Space is inaccurate and/or partial in a number of material elements.<br><br>Do feel free to contact us by letter or email if there any points you would like to clarify. On a very small point of fact in relation to our 2105 Objection, the Council's Interactive Plan does now show as the "Old Vicarage" as opposed to the incorrect "Marshfield House" that was on the Interactive Plan in 2015.<br><br>Please confirm receipt of this email.<br><br>**From:** Quentin Woodley<br><br>**Sent:** 20 July 2015 14:36<br><br>**To:** planningLDF@southglos.gov.uk<br><br>**Subject:** LGSD214<br><br>We are writing in connection with the above proposed Local Green Space 214 and your letter to us requesting our Comments dated 13th July 2015.<br><br>of the portion of this proposed LGSD and have today sent you by First Class post a short note setting out our Comments/objections with regard to the creation of the LGSD (which primarily comprises attached to ) along with the completed Response Form from your website and an associated annotated Plan of the area concerned.<br><br>For completeness however, we have attached to this email a copy of the short note that sets out our Comments/objections and the associated annotated Plan (but unfortunately not the completed Response Form as I'm afraid we don't have a multi-page scanner).<br><br>If you have any questions in relation to our Submission or if we can provide any further clarification please do not hesitate to contact us. |
| **Attached documents** | Quentin and Carol Woodley.pdf (497 KB) |

| | |
|---|---|
| **Respondent Name** | Eric Andrews - Friends of Filnore Woods |
| **Comment ID** | 20060865/1673 |
| **Document Part Name** | Question 22 - Local Green Spaces |

| | |
|---|---|
| **Comment** | Filnore Woods<br><br>Please find attached an Application on behalf of the Friends of Filnore Wood for the designation of the Filnore Woods as a Local Green Space. |
| **Attached documents** | Friends of Filnore Woods (Mr. Eric Andrews).pdf (1.9 MB) |

| | |
|---|---|
| **Respondent Name** | Kathryn Davis |
| **Comment ID** | 19936225/1731 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD130 and LGSD729<br><br>Secondly, I want to nominate SG82 Hanham Cricket Club's existing ground in Abbots Road and SG259 Gover Road and Stone Hill View Green Space as Designated Local Green Spaces. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Julia Deacon |
| **Comment ID** | 19935713/1744 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD130 and LGSD729<br><br>I wish to nominate SG82 the Cricket Ground and SG259 Gover Road and Stone Hill View Green Space as Designated Local Green Spaces. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Oliver Shirley |
| **Comment ID** | 19758945/1762 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD220 and LGSD212 |
| **Attached documents** | EGSD220 and LGSD212.pdf (1.5 MB) |

| | |
|---|---|
| **Respondent Name** | Lesley Reuben - Filton Town Council |
| **Comment ID** | 8064801/1764 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD092<br><br>Additional Comments sent to us on 5th June 2018 as per the below:<br><br>Please find attached an amended Boundary Map, with the amendment shown in green, I have also added an extra paragraph (shown in blue) to our Submission regarding the North East corner of the Map.<br><br>Please let me or my colleague Tasha Gould know if you require any further information. |
| **Attached documents** | EGSD092.pdf (401 KB) |

| | |
|---|---|
| **Respondent Name** | Edwina Griffith |
| **Comment ID** | 12514497/1770 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD135<br><br>**Space Code: LGSD135.** |

| | |
|---|---|
| | **Parish: Hanham Abbots.**<br><br>**Name of Space: Fields Behind Houses on Court Farm Road to River Down to Willsbridge Hill.**<br><br>**Status: Local Green Spaces Not Designated in the PSP Plan Adopted Nov 2017.**<br><br>**Landowner Reference Address: Land on the South Side of Court Farm Road, Longwell Green (Land Registry Ref: GR239021)**<br><br>Dear Sir/Madam,<br><br>Further to your email dated 6th March 2018, please find our Responses to your requests as below and note the attached Documents:<br><br>**1. Confirmation of our position on designation of LGSD135 Local Green Space as part of the re-assessment:**<br><br>a. Our position remains unchanged and we strongly object to the proposal to designate the land as a Local Green Space. There are Planning Permissions on the Space, it is an extensive tract of land and local landowners strongly object. Furthermore, the land is not beautiful, of historical significance, have recreational value, have tranquillity or richness of wildlife like a nature reserve.<br><br>b. Our Submission to the 2015 Local Green Space Consultation remains valid and hence please find attached for your reference should you wish to review our Response again in more detail.<br><br>Given the extensive number of Documents requested we are also posting this Response to ensure there is no loss of material for consideration by the Council. If you would like any further information, please do not hesitate to contact me via email or using the details in the Forms provided. |
| **Attached documents** | EGSD135.pdf (1.4 MB) |

| | |
|---|---|
| **Respondent Name** | Neil Boyett |
| **Comment ID** | 12499297/1778 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD341 |
| **Attached documents** | EGSD341.pdf (503 KB) |

| | |
|---|---|
| **Respondent Name** | Briarlands Management Committee |
| **Comment ID** | 20061089/1801 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD615<br><br>Dear ,<br><br>**Local Green Space Consultation**<br><br>**LGSD615 Briarlands Guide Association Activity Site**<br><br>I refer to the above and your letter dated 12th March 2018 to The Guide Association Trust Corporation (GATC). Your letter has been passed to the Briarlands Management Committee and their Representative has in turn asked me to make these short Representations on their behalf. In this respect can future correspondence be sent to:-<br><br>Briarlands Management Committee<br><br>Firstly, neither GATC nor the Briarlands Management Committee recall any specific Consultation in respect of the designation of the land as Local Green Space (LGS) and the existence of the designation is therefore a surprise to them both. This lack of specific Consultation is regrettable. For the record they would have objected to the designation of the site as LGS.<br><br>The land is privately owned with restricted “bookable” access only. The land is also already situated in the Green Belt so “Very Special Circumstances” are already required for any inappropriate development.<br><br>Therefore, secondly, the GATC and the Management Committee object to the continued application of this designation to the land and request that |

| | |
|---|---|
| | it be removed. While there is no current intention to dispose of or propose redevelopment of the site outside of the Guide Association use removal of the designation would simply take any development proposed outside the inappropriate application of Policy PSP4.<br><br>The basis for LGS designation arises from Paragraphs 76 - 78 of the NPPF. From a reading of the language it is clear that what is envisaged is a limited additional protection for special and particularly valued local sites. Therefore, the blanket approach adopted by the Council is wholly inappropriate.<br><br>Firstly, the Government does not intend such an approach to the applicability of this quasi "Green Belt" designation and to qualify sites need to be:-<br><br>o Of particular importance to the local community.<br><br>o Reasonably close to the community they serve.<br><br>o Demonstrably special to that local community.<br><br>This private and detached land has none of these characteristics and is in addition not demonstrably special for its beauty, history, recreational value, tranquillity or wildlife. Neither the GATC nor the Management Committee suggest that the site is not valuable for the Girlguiding activity it contributes to (or for other use when booked) but simply that it is not demonstrably special or near enough to the local community to qualify for this additional designation.<br><br>Therefore GATC and the Management Committee object to the continued application of the LGS designation to the land and requests that it be removed. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Ms. J. Hillier and Barratt Homes (Bristol) Ltd |
| **Comment ID** | 19740673/1844 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD433 |
| **Attached documents** | LGSD433.pdf (400 KB)<br>19294 A3 PR jmm 180425 LGS REPS Woodlands Farm.pdf (349 KB) |

| | |
|---|---|
| **Respondent Name** | Keith Gooden |
| **Comment ID** | 19443137/1870 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | Dear ,<br><br>I wish to formally object to the change of status of a parcel of land between Barn End in Marshfield and the Church.<br><br>Its designation appears to be altered in the new Plan which would enable it to be used for development.<br><br>This land has many trees, a rookery, crested nests and Pipistrelle Bats living on it. It has been undeveloped, but I believe the owner is trying to build houses on it.<br><br>I strongly object to its redesignation under this Plan. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Scott and Sarah Cameron |
| **Comment ID** | 19722305/1893 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD433 |
| **Attached documents** | LGSD433.pdf (3.4 MB) |

| | |
|---|---|
| **Respondent Name** | Charlotte Hobbs |
| **Comment ID** | 19936609/1923 |

| | |
|---|---|
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD792 and LGSD130<br><br>I also wish to nominate SG82 The Cricket Ground & Stonehill View Green Space as designated Local Green Spaces. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mr. P. Peaster & Mrs. J. Peaster |
| **Comment ID** | 5920737/1936 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD058 |
| **Attached documents** | LGSD058.pdf (94 KB) |

| | |
|---|---|
| **Respondent Name** | Richard Moorlen |
| **Comment ID** | 20061217/1939 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD886<br><br>I have just been informed by a neighbour that land of which we own a proportion has been nominated for Local Green Space designation. I wish to object to this nomination on a number of counts:<br><br>As an owner of land affected by this proposal I have not Been contacted by the Council in any way, we bought the land in and there was no indication that this was under consideration. Has the Council contacted all the other owners of the land?<br><br>The land is not abandoned and has never been used for recreation sporting activities as suggested by the Parish Council's Application, it is privately owned land with no Public Right of Way.<br><br>This land has no Historical significance, it is not local in Charter, it has no recreational or tranquillity value as is privately owned with no public access. It is an extensive tract of land and as such is not suitable for consideration as Local Green Space.<br><br>Current Planning Policy does not allow new development in the area so this land would not benefit from designation.<br><br>Can you advise promptly how I formally object to this proposal as I understand time is short as it has to be completed by 30th April, can you also confirm you have contacted the other affected land owners. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Brian and Rosalind Snow |
| **Comment ID** | 14504449/1956 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD213<br><br>Dear Sir or Madam,<br><br>Following my conversation this morning with we are sending this email to make you aware that we have only just learnt, by chance, of a SGC Consultation and potential redesignation of land that is owned by us and also that borders our property.<br><br>You have failed to inform us of this matter and have failed to send us the necessary Documents seeking our opinion. In fact we strongly object to the redesignation of what is currently, under the 2004 SGC Plan, Protected Open Spaces.<br><br>We would like to see all of this land designated as Protected Open Space or if you have changed your nomenclature Local Green Space.<br><br>We would now appreciate the opportunity to Comment further on these proposals but are concerned that the deadline for Comments is Monday 30th April 2018 at 23.59hrs. |

| | |
|---|---|
| | We hope to be able to send you our views today on a downloaded copy of the Response Form.<br><br>However in the event that we cannot get our Response to you in time we would appreciate an extension to the deadline so that we are not excluded from consideration.<br><br>We would also ask why some areas of LGSD213 that are currently designated Protected Open Spaces (Policy L6 of the 2004 SGC Plan) are been removed from being designated Local Green Space on your current Map shown on your website?<br><br>Further it would seem that the residents of Barn End, Withymead Estate and East (Little) End whose land borders LGSD213 have not been Consulted about this matter and will be contacting you soon. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Mike Botta |
| **Comment ID** | 19741665/1988 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD429 |
| **Attached documents** | LGSD429.pdf (135 KB) |

| | |
|---|---|
| **Respondent Name** | Andrew Penna - Torch Planning |
| **Comment ID** | 20070113/2061 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | Land at Station Road, Charfield |
| **Attached documents** | Torch Planning (Andrew Penna).pdf (470 KB) |

| | |
|---|---|
| **Respondent Name** | Sara Tucker - North & Letherby Ltd |
| **Comment ID** | 19730785/2063 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD809<br><br>Dear Sir or Madam,<br><br>I attach objections to the following sites currently proposed as Local Green Spaces to the North of the High Street, Iron Acton.<br><br>o LGSD808 – The Avenue, Iron Acton<br><br>o LGSD809 – Land to the North of Iron Acton Village<br><br>I also attach a Plan submitted to the Council today for the Local Plan Call for Sites. The site shown on the attached (considered as one area for the Call for Sites) comprises both of the two LGSD sites.<br><br>We act on behalf of , who object to the potential designation.<br><br>I would be grateful if you could please confirm receipt of the attached. If there are any queries, please do not hesitate to contact me. |
| **Attached documents** | LGSD809.pdf (486 KB) |

| | |
|---|---|
| **Respondent Name** | Sara Tucker - North & Letherby Ltd |
| **Comment ID** | 19730785/2064 |
| **Document Part Name** | Question 22 - Local Green Spaces |

| | |
|---|---|
| **Comment** | LGSD808<br><br>Dear Sir or Madam,<br><br>I attach objections to the following sites currently proposed as Local Green Spaces to the North of the High Street, Iron Acton.<br><br>o LGSD808 – The Avenue, Iron Acton<br><br>o LGSD809 – Land to the North of Iron Acton Village<br><br>I also attach a Plan submitted to the Council today for the Local Plan Call for Sites. The site shown on the attached (considered as one area for the Call for Sites) comprises both of the two LGSD sites.<br><br>We act on behalf of , who object to the potential designation.<br><br>I would be grateful if you could please confirm receipt of the attached. If there are any queries, please do not hesitate to contact me. |
| **Attached documents** | EGSD808.pdf (488 KB) |

| | |
|---|---|
| **Respondent Name** | Paul Davis - Persimmon Homes Severn Valley |
| **Comment ID** | 3553569/2267 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD280 |
| **Attached documents** | EGSD280.pdf (435 KB) |

| | |
|---|---|
| **Respondent Name** | Gill Penberth - Tormarton Parish Council |
| **Comment ID** | 19943937/2268 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD315; LGSD316; LGSD988; LGSD318; LGSD319; LGSD320; and LGSD989 |
| **Attached documents** | Tormarton Parish Council (Gill Penberth).pdf (6 KB) |

| | |
|---|---|
| **Respondent Name** | Ashfield Land |
| **Comment ID** | 16658689/2283 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD138 |
| **Attached documents** | EGSD138.pdf (444 KB) |

| | |
|---|---|
| **Respondent Name** | Richard Baber - Edward Baber Deceased Will Trust |
| **Comment ID** | 20061153/2285 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD139 |
| **Attached documents** | EGSD139.pdf (909 KB) |

| | |
|---|---|
| **Respondent Name** | Richard Baber |
| **Comment ID** | 20370401/2286 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD135 |
| **Attached documents** | EGSD135.pdf (919 KB) |

| | |
|---|---|
| **Respondent Name** | Richard Baber - Edward Baber Deceased Will Trust |
| **Comment ID** | 20061153/2287 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD135 |
| **Attached documents** | LGSD135.pdf (911 KB) |

| | |
|---|---|
| **Respondent Name** | Brian Snow |
| **Comment ID** | 20070273/2305 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | LGSD213<br><br>Dear and ,<br><br>For the avoidance of any doubt please see copy attached of the Title Number AV219467 showing the registered owners as and on the map showing clearly the portion of LGSD213 that own.<br><br>Please could we now be officially Consulted about the classification of LGSD213 which we would like to remain as Green Open Space.<br><br>Thank you.<br><br>Additional Comments sent to us by email on 26th May 2018 as per the below and the attached Document (Titled: Letter to SGC Re: LGSD213):<br><br>Dear Parish Council,<br><br>I have been advised to send this follow up letter (to my rushed Response to the 2018 LGS Consultation) to SGC following meetings that I have held this week seeking legal and procedural advice, in order to clarify:<br><br>1. That we the Snow family have never been Consulted about LGSD213 and are asking for recognition.<br><br>2. That the land is owned by , of whom want it to be designated Local Green Space.<br><br>3. Highlighting the salient points in the 1987 Appeal Report by a Government Inspector who rejected a Planning Application for the land but whose points equally apply to a LGS debate today as they did to a Planning issue in 1987.<br><br>4. Mentioning the Petition to reinstate the Local Green Space designations in Marshfield which has already over 100 signatories and which I believe will be signed by over 90% of villagers.<br><br>Many thanks.<br><br>Additional Comments sent to us by email on 19th June 2018 as per the below:<br><br>Dear ,<br><br>Thank you for your e-mail dated 8/6/18.<br><br>In response please could I make some points.<br><br>I did also submit a Response (by registered post) on 26/4/18 to the 2018 Consultation which you have not acknowledged. If you did not receive this I would be glad to send you another copy.<br><br>I am still not sure that we are clear about the area of land that , of , the Marshfield Parish Council, our two SGC Councillors and so far over 100 Petitioners would like to be designated as Local Green Space (LGS). |

It is the area of land bounded to the North by The Barn and The Stable Block, to the South by the back gardens of the cottages of East (Little) End, to the West by St. Mary's Church and to the East by the gardens of Withymead Road and Barn End (See Appendix 2 attached).

You say in point 5 of your e-mail that LGSD213 as of Feb 2018 does not include any of land and therefore you did not contact me directly in 2018.

However in 2015 the SGC Plan of Designated Local Green spaces (Copy attached Appendix 1) did include this area of land which included portion of this land and therefore I should have been contacted for my Response. You correctly identified as of this land of and the of , who were contacted by you and who submitted a Response, but you did not contact me. If you had recognised me then you would logically have contacted me again in Feb 2018 as you did with the other .

On the attached Plan (Appendix 2) I have shown (in green pen) the area of land that has been taken out of designation. I have also shown (green dash lines) who owns the portions of land and I have also marked in orange the houses which overlook this land and whose owners have signed the Petition to designate the land as LGS.

Please could I stress that this area of land is not ! (See definition in Oxford English Dictionary). It is a green open space of orchard and woodland. Its importance in terms of Beauty, Historical significance, Tranquility and Richness of Wildlife have been expressed clearly in the Responses to your Consultation and by the Independent Inspector who carried out the Appeal on behalf of the Departments of Environment and Transport in 1987 (Copy sent to 25/5/18). It can be viewed clearly from the surrounding gardens of Petitioners and from the Churchyard of St. Mary's Church.

So given that it seems that something has gone wrong, and that an error was made in 2015 in identifying ownership of this land and in allowing to request designation, please could I ask that you re-assess the designation of the whole of this area in your current review as concluded by your Independent Inspector.

Many thanks.

On 8th Jun 2018, at 16:06, wrote:

Dear Mr. Snow,

I'm pleased to confirm receipt of the following correspondence. I apologise for delay in acknowledging receipt, we will consider these as part of reassessing the designation of the Local Green Spaces as work on preparing the Council's new Local Plan 2018 - 2036 progresses over the next year:

1. Email dated 26/4/2018.

2. Email dated 2/5/2018.

3. Letter dated 25/5/2018, addressed to .

We have released a note regarding Local Green Spaces in Marshfield today to the local Ward Councillors, Luke Hall MP and the Parish Council, I have attached a copy for your information. The note reports on the Spaces as at February 2018 and does not address any Representations to the recent Consultation. However, please be assured that Representations made will be taken into account as the Local Plan progresses over the next year. We will contact you again at the future Consultation stages. I hope this note is helpful.

I'm also pleased to confirm the following in respect of your correspondence:

1. Officers will review the Representations and requests for the amendment to the boundary of spaces. The Council will then consider these recommendations as part of preparing the Council's new Local Plan. We will consider the above correspondence including the submitted Petition - for which we will record yourself Mr. Snow as the lead Petitioner, with any relevant future correspondence being sent to you.

2. We acknowledge the Land Registry details sent through demonstrating the extent of , and thank you for this information.

3. Policy L6 (actually adopted in the 2006 Local Plan as Policy L5), was replaced by Policy PSP5 of the Policies, Sites and Places Plan. The Conservation Area Advice Note for Marshfield remains in place and the status of the land identified as 'protected Open Spaces,' remains unchanged from when the Conservation Area Advice Note was published in 2004, albeit Policy PSP5 now forms the basis for the identification of the 'protected Open Spaces.' The attached note provides more information on this.

4. We acknowledge the extent of , and your stated Submission to welcome the designation of land as a Local Green Space. We note that this is also supported by the Parish Council in their Submission to us.

| | |
|---|---|
| | 5. We have attached a Plan displaying the extent of LGSD213, as at February 2018. Please note this does not include any land. The boundary represents the extent of the Submission made by Marshfield Parish Council in 2015. We have sought to contact directly affected for nominated/ designated Local Green Spaces, therefore we did not contact you directly earlier in the year, as the extent of the nominated space we have on record did not cover . However, please be assured that we will contact you at all future relevant stages to provide you with an opportunity to Comment.<br><br>I trust this information is helpful and answers your questions.<br><br>Please be assured that we will take account of the Representations made, that we will contact you in the future at all relevant stages and that there will be further opportunities to make formal Representations anticipated to take place in 2019.<br><br>Kind regards,<br><br>Principal Planning Officer<br><br>Additional Comments sent to us by post which were date stamped as being received on 31st May 2018 as per the contents of the attached Document (Titled: LGSD Response - Brian Snow).<br><br>Additional Comments sent to us by post which were date stamped as being received on 1st May 2018 as per the contents of the attached Document (Titled: LGSD213).<br><br>Additional Comments sent to us by email on 16th October 2018 as per the below:<br><br>Dear ,<br><br>I appreciate that the deadline for Comments on your Consultation for Local Green Spaces - Marshfield Feb/March 2018 as part of the SGC Local Plan has long passed and that by now you will be well entrenched in your Review.<br><br>However a Document has been recently updated that we believe to be of importance to your Study.<br><br>The Defra Government website www.magic.gov.uk for 2018 shows that the area that we and Marshfield Parish Council have asked to be designated as LGSD213 is the only area within the Settlement Boundary of Marshfield to be given a Priority Habitat Designation. The wooded area of LGSD213 is designated as a Defra 'Priority Habitat Inventory Deciduous Woodland' and the Orchard Area of LGSD213 is designated as a Defra 'Priority Habitat Inventory Traditional Orchards.'<br><br>We would kindly ask you to include this recent 2018 information as part of our portfolio of evidence to ask for the designation of LGSD213 to be considered as Local Green Space in its entirety.<br><br>Many thanks. |
| **Attached documents** | LGSD213.pdf (3.8 MB)<br>Letter to SGC Re LGSD213.pdf (18 KB)<br>Register Plan AV219467.pdf (310 KB)<br>LGSD Response - Brian Snow.pdf (5.0 MB) |

| | |
|---|---|
| **Respondent Name** | Alan Jones - Hanham District Green Belt Conservation Society |
| **Comment ID** | 17236353/2306 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | **HANHAM DISTRICT**<br><br>**Green Belt Conservation Society**<br><br>**Founded 1981**<br><br>*Hanham Cricket Ground - Abbots Road Hanham*<br><br>*13th April 2018*<br><br>We have previously written to yourselves regarding the procedure adopted by South Gloucestershire Council, over the exclusion of the Cricket Ground from the Local Green Spaces Register. |

| | |
|---|---|
| | Our concerns centred over the issue that, as far as we are aware, contrary to the accepted procedural requirements, the site was excluded by SGC's Officers from the Register, due to Representations from an Agent, not as required - the actual owners of the site.<br><br>From enquiries to HM Land Registry, we now learn that SGC have a pecuniary interest in the development of this site and consider the whole procedure associated with the absence of this site from the Green Spaces Register, requires independent examination.<br><br>A triangular section of the site, adjacent Abbots Road, is in the ownership of SGC (Land Registry Reference: GR352138 - see enclosed Site Plan) This ownership has not been indicated on any Documentation published in connection with the 'Call for Sites' procedure, nor mentioned in discussion of the very controversial development proposals for the site - In other development situations, the land holding of SGC would be considered a 'ransom strip' of considerable value.<br><br>You are no doubt aware that last year, 1,200 local people signed a Petition which was drawn up by our MP - Chris Skidmore, against development of this active, quintessential Cricket Ground. We find it incredible that SGC have remained silent on their involvement and have failed to declare their interest.<br><br>We consider that the serious procedural inadequacies of dealing with this site require urgent, detailed scrutiny by an independent arbiter, followed by the rescheduling of the site onto the Green Spaces Register. |
| **Attached documents** | |

| | |
|---|---|
| **Respondent Name** | Eric Andrews - Friends of Filnore Woods |
| **Comment ID** | 20060865/2316 |
| **Document Part Name** | Question 22 - Local Green Spaces |
| **Comment** | Land at Vilner Lane<br><br>The Friends of Filnore Wood would like to support the Application by the Thornbury Community Composters for the designation of the small wooded site at Vilner Land. Form attached. |
| **Attached documents** | Friends of Filnore Woods (Mr. Eric Andrews).pdf (418 KB) |

Report run at 24 Jan 2019 08:39:25. Total records: 2373.