
Report on Questionnaire Answers

Questionnaire: Local Plan 2020

Question: [7: Strategy- Where will development go] Do you have any comments ...

Respondent Name	User Response: Text	Response Created
A. Ashyon	Try to reduce impact on the environment for any new building. Planning should be around the natural things. At the moment the council and house developers put profit before environment. It must become the other way around.	31 Jan 2021
Adam Gould	It is important to consider areas of rural villages which are developed, part of the village but due to an illogical settlement boundary and swathe of green belt can't be developed.	27 Feb 2021
Alan Jones - Hanham & District Greenbelt Conservation Society	<p>Any planned proposal must be based on evidence. No attempt has been made to establish the actual housing needs, nor analysis made of the current shortfall of accommodation within South Gloucestershire. Instead, the plan is to assess areas within SGC, with the obvious slant - how to accommodate more standard pattern housing.</p> <p>Nothing has been stated in these proposals regarding enforcing the release of the backlog of the over one million housing units* which have received planning permission but remain unbuilt. This issue needs to be addressed urgently and would resolve much of the pressure on Authorities, to plan for more growth. It would be completely unacceptable for Green spaces and Green Belt land to be devoured to satisfy unsubstantiated demand, whilst existing sites, with planning approval, remain vacant.</p> <p>*Figures from Local Government Association (Feb 2020)</p> <p>As stated in Response 3: - Comment on Issues: above, We question the dichotomy of this plan pursuing an approach to build on green spaces and the Green Belt. The approach advocated here is in direct opposition to SGC's current published Strategic Policies and The Housing Minister's assurances.</p> <p>The Consultation advocates a 'plan-led approach' to potential growth, however, from reading the document, we feel that the over-riding criteria remains - build significantly more housing!!!</p> <p>Despite the title, the document is a review of possibilities for constructing new homes, and is only the precursor of a 'Plan'.</p> <p>As a group, we are very concerned about Greenbelt and Green Spaces. The document itself States that 42% of SGC area is designated as Greenbelt, this point is made as a 'warm-up' for the statement (Page 118) that every rural community should be investigated and considered in making a contribution to the plan-led growth! In addition, there are several suggestions of new housing 'Settlements' within current Greenbelt areas, contrary to currently published SGC Policies.</p>	26 Feb 2021
Alan Piper	<p>Rural Villages:</p> <p>Wickwar is a rural village and has</p> <p>a) few amenities within a 3 mile radius</p>	20 Feb 2021

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	<p>b) very poor infrastructure making it an unsuitable location for further development.</p> <p>SGC's consultation document incorrectly states: "Wickwar and Yate have walking and cycling access to a range of services and facilities and, or public transport connections." Yate has, but Wickwar does not.</p> <p>Consideration needs to be given to how people can commute to their place of work in an environmentally friendly manner. People in Wickwar who work don't work in Wickwar. They commute by car as they have no practical alternative. Traffic volumes through the village is therefore a significant issue.</p>	
Alex Child - The Retirement Housing Consortium	Policies should be very carefully worded to give positive encouragement and preference to the development of urban areas and market towns ahead of urban extensions in the interests of sustainability and supporting the high street.	01 Mar 2021
Ali Adams - Siston Parish Council	We think that with the development of roads, such as the ring road it is enabling the Council to move settlements into areas of green belt that would previously been denied. This is eating away at an asset and no one is looking clearly at this lose in the long term.	24 Feb 2021
Alice Di-Duca	I think that smaller numbers of each area is better than huge new developments if you genuinely want to preserve the character. Also more smaller schools is better than turning existing lovely village schools in to huge, double intake uncharacterful buildings. Again this is key to preserving character of village life.	10 Jan 2021
Amy Gould	You should consider areas of rural village that are separated due to settlement boundary lines and no other reason.	28 Feb 2021
Andrew Humphrey	In general yes but need to be mindful of roads/Infrastructure in place plus why people live in villages is so that are peaceful and not built up. Any rural villages should only be considered for a small building block of say maximum of 3-5% of total number of houses currently in village.	31 Jan 2021
Andrew Rigler	Small developments in villages, large developments in existing brown sites as Filton Aerodrome. Multi story buildings for housing are required to stop the increased use of green field sites.	31 Jan 2021
Andrew Shore	<p>I find it a bit too compartmentalised. Eg. Stoke Gifford frequently now described as urban and planning decisions generally result on that basis, with lots of high density build & little open space. But there remain rural or at least less urban parts of Stoke Gifford, which need to be respected.</p> <p>On the other hand, rural parts of South Glos often get tasteful applications refused, because in green belt areas. Any of those are very good infill applications, conversions of barns etc, and should be looked at more positively, rather than negatively.</p> <p>In other works, we need a more balanced approach across the whole of South Glos, that reflects the locality more, but doesn't overly put areas into stove pipe categories.</p>	01 Mar 2021

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Andrew Stacey	Although building on brown field is a good thing, it must not be at the cost of local employment.	08 Feb 2021
Angela Chapman	Rural villages and extension of..I don't agree, but have probably answered all of what I feel in other questions on this form Villages need to remain with green spaces surrounding them. Towns could be enlarged marginally and sympathetically according to age. I don't agree with making Thornbury a retirement village or town which is what's happening. Thornbury has its share of the elderly population relatively to other age groups. The younger age groups will migrate permanently if Thornbury becomes a retirement town. We need all ages groups with respect to form a well balanced community	23 Feb 2021
Angela Crabtree	Please see the Trapp'd Response. (Thornbury Residents Against Poorly Planned Development)	28 Feb 2021
Angie Carroll - Parish Council	Too many villages around SG have no infrastructure left to cope with new building	16 Feb 2021
Anne Thomson - Burbank Neighbourhood Watch	No	21 Jan 2021
Annette McLaren	Rural villages and greenbelt should be removed from development as it contradicted policy main objective and will created a negative affect	28 Feb 2021
Ann Fray	New proposed developments seem to be going against your plan and priorities in Wickwar!	25 Feb 2021
Ann O'Driscoll - North Bristol SusCom Ltd	Locations should be based on sustainability and transport criteria. It is important that it is understood how each development will impact on climate change and how each can contribute to the goal of achieving net zero by 2030.	01 Mar 2021
Ashfield Land	Please see enclosed representations. 7.5 Yes, we agree that the five building blocks identified are the key ones to consider at the current time for the SGC area. However, as we set out elsewhere the interrelationship with then regional SDS, which will also set a spatial strategy, needs to be carefully considered. Do you have any comments on the five building blocks (Urban Areas, Urban Extensions, Market Towns, Rural Villages, New Settlements)? 7.6 For the reasons set out in earlier sections of our representations, we have some concerns that the Local Plan is pre-determining a strategy that is intended to be set by the Spatial Development Strategy at a regional level. Clarification is required by the WECA, and SGC, to identify which tier of Authority will be setting the appropriate strategy for the region is and what the scope of each Plan will be to avoid inconsistencies. 7.7 Notwithstanding the above concern, the Sustainability Appraisal work	31 Mar 2021

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	<p>undertaken by LUC in support of the Phase 1 Consultation Document clearly identifies the ‘building blocks’ that score most highly, which the SGC Local Plan should pursue. Namely after intensifying existing urban areas – urban extensions to Bristol (which includes Hanham) are the most sustainable development option and this should be recognised by SGC in the next stage of the process.</p> <p>7.8 However, we recognise that there is likely to be a ‘blend’ of all of the options because there is such a vast array of settlements across South Gloucestershire which have a range of different issues that require a different solution – there is ‘no one size fits all’ approach. As such, we consider that there must be some modest growth in the Market Towns and Rural Villages to sustain and enhance these settlements, in addition to the larger scale growth that should occur as part of urban extensions.</p> <p>7.9 We strongly disagree with the building block that proposes the provision of a new settlement within the Northern periphery of South Gloucestershire for the reasons we have set out in these representations and in previous representations to the JSP –namely that this is likely to result in significant adverse effects in terms of environmental impact as a result of an increase in commuting, it does not place residents in a location where non-car forms of transport can be maximised (which is contrary to the policies of the NPPF) and it requires a significant amount of investment from inception which has not been properly costed and the proposals viability and feasibility is therefore highly uncertain.</p>	
ATA Estates (Longwell Green) LLP and Sovereign Housing Associaton	<p>In general terms the five suggested building blocks appear reasonable. However, it would be helpful to know if any options have already been discounted by the Council.</p> <p>According to the Consultation Document, the Council is clear in its position that the likelihood of meeting all of its needs for new homes and jobs in the urban areas, with Building Block 1, are low. Page 63 of the Document identifies that greenfield extensions to urban areas, towns and villages may offer the next best opportunity in meeting the needs of the District.</p> <p>Whilst the total number of new homes that the Plan will need to provide will be set out in the SDS, South Gloucestershire will likely need to accommodate the cross boundary needs of Bristol under the Duty to Co-operate, as well as its own. Under the Government's current standard methodology, Bristol City Council will be expected to deliver at least 3,196 new homes per annum and it is widely suspected that the City will not have the capacity to meet this.</p> <p>For South Gloucestershire specifically, the Consultation Document identifies a requirement for at least 1,412 new homes per annum, equivalent to 21,180 new homes over the proposed Plan period (2023 – 2038). The Council’s 2019/20 Housing Trajectory suggests that approximately 8,931 units could be completed from 2023 onwards and so, on that basis, the Council would need to find land for 12,249 new homes over the proposed Plan period, in addition to the sub-regional needs of Bristol and BANES.</p> <p>According to the Council’s proposed approach, Building Block 2 would witness the</p>	06 Apr 2021

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	<p>expansion of the main urban areas along the Eastern and Northern Fringes of Bristol through small or large urban extensions. This, we believe, would be the most sustainable approach for meeting the housing numbers which are to be established through the SDS.</p> <p>The Council's Phase 1 Sustainability Appraisal (SA) identifies that urban extensions to the fringes of Bristol (Building Block 2) could result in significant positive effects in relation to access to healthcare services, community facilities, education, retail, major employment areas and green infrastructure, as well as reducing levels of deprivation. Page 29 of the SA notes that the Local Plan presents further opportunities to allocate new housing development sites at locations which are in close proximity to existing healthcare facilities, open spaces and other facilities, which might encourage healthier lifestyle choices.</p> <p>Sites on the Eastern Fringes – such as our client's land at Longwell Green (see Site Location Plan at Appendix 1 to this Form) – are well-located for meeting the needs of the District and what is expected to be an 'overspill' of housing need in Bristol. As we go on to explain in these representations, our client's site is capable of delivering housing-led development that would achieve many of the positive effects outlined in the SA.</p> <p>However, the Green Belt is a clear policy obstacle to achieving sustainable levels of growth across the District, in particular on the Eastern Fringes of Bristol. We note this given the disproportionately low number of non-Green Belt sites put forward as part of the 2020 Call for Sites. With this in mind and noting the Council's acknowledgement that it will need to consider greenfield extensions to main urban areas, it must undertake a detailed Green Belt Review at the earliest possible opportunity.</p> <p>Under Building Block 3, the potential for sustainable growth would be investigated around the edges of the three market towns of Yate, Chipping Sodbury and Thornbury. Whilst we do not specifically object to this approach, we would highlight the extensive levels of completed and committed housing growth that has occurred in these towns already during the course of the current Plan period (2006 – 2027).</p> <p>Taking Thornbury as an example, Policy CS15 of the Core Strategy identifies that 800 new homes should be developed in the town during the Plan period (up to 2027). Data from the Council's AMR's (2013 – 2019) suggest that during the first six-year period that the Plan was adopted, 749 new houses were completed, equivalent to 93% of the town's indicative phasing capacity over the 15 year period. As of August 2020, the Council's Data & Access Profile (November 2020) confirmed that Permissions exist for a further 701 new homes in the town. With 7 years of the current Plan period left some, if not most, of these consented homes could be delivered, taking the total number of housing completions in the town to nearly double that was planned for.</p> <p>Similar conclusions may be drawn in relation to the market towns of Yate and Chipping Sodbury which, akin to Thornbury, are reported by the Council to have</p>	

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	<p>higher levels of commuting (Page 108 of the Consultation Document).</p> <p>Therefore, in investigating the potential for sustainable growth around the edges of the three market towns, consideration must be given to the extensive level of completed and committed housing growth already. These towns are essentially ‘overheating’ and strategic levels of growth in these locations would be neither socially or environmentally sustainable, and would only serve to increase levels of commuting to key employment areas in and around Bristol.</p> <p>Building Block 4 would result in the potential for an appropriate level of sustainable growth in and around the wide range of rural villages and settlements in the District. Under the Building Block which is considered further at Chapter 7 of the Consultation Document, Longwell Green is identified as a “rural village and settlement,” despite it evidently forming part of the existing urban area on the Eastern Fringe of Bristol, in proximity to Hanham Town Centre. We therefore object to Longwell Green’s classification as a “rural village and settlement.”</p> <p>Building Block 4 should result in the consideration of appropriate small-scale growth in and around villages such as Cold Ashton, Marshfield and the many truly rural settlements of the District. The status of such villages within the settlement hierarchy is much lower and, given their much lower accessibility credentials than other more sustainable locations (Building Blocks 1 and 2 in particular) and the constraints that many of these areas face (such as lack of infrastructure), only small-scale growth opportunities should really be considered.</p>	
Barratt Homes (Bristol) Ltd	<p>Please see enclosed submission.</p> <p>Identifying Potential Building Blocks:</p> <p>1.33 This is a very understandable approach to setting out the issues for consultation with the general public. We do not object to the simple approach of identifying potential building blocks. In reality however no single building block will on its own deliver the scale of growth required within South Gloucestershire. As the Plan progresses, it will be important to identify a robust Spatial Strategy drawing on a number of building blocks. Clearly it will be important to reflect the work undertaken as part of the SDS and the Duty to Co-operate. It will be important to meet the growth needs of the West of England and in doing so, we would urge to Council to have regard to the merits of building block 3 in respect of potential growth at Yate as we discussed below.</p> <p>1.34 Under building block 3, development would be accommodated around market towns such as Yate. The Council identifies that there is potential for sustainable growth to be investigated around the edges of the market towns including Yate, and we support this recognition and urge the Council to bring forward a Spatial Strategy that reflects the benefits of this location.</p>	14 Apr 2021
Barrie Hesketh	Use existing vacant and or “brown field “ sites.	16 Feb 2021
Barwood Development	Potential Guiding Principles 1 and 5:	12 Apr 2021

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<p>Securities & The North West Thornbury Landowner Consortium</p>	<p>? Bullet 3 (p61) states that an aim in development the growth strategy is to “ensure that new and existing places offer a balance of new homes and jobs.” Whilst on the face of it this sounds good in principle, we question whether applying such an objective at the local settlement level is appropriate or indeed desirable.</p> <p>There is a role for the delivery of new local employment opportunities, in addition to any strategic employment sites, but there is no justification for a ‘balance.’ Indeed, the NPPF expressly states that in delivering larger scale development, employment opportunities should be ‘sufficient’ but that there should be no unrealistic level of self-containment, and that good access to larger services centres is appropriate (paragraph 72). The underlying premise that jobs and homes should be ‘balanced’ should be revisited to ensure that any policy aim is underpinned by an understanding of the regional employment market, and realistic expectations in regard to future travel to work areas.</p> <p>The Sustainability Appraisal (Appendix 4) states that access to employment opportunities via a mix of walking, cycling and Public Transport will inform the site selection process, as opposed to provision within an individual settlement itself. We support this approach and would suggest that it is this which should be incorporated into the consultation document.</p> <p>Potential Guiding Principles 3 and 4:</p> <p>? We recognise the importance of ecological, landscape and heritage features, and the wider green infrastructure network. In taking these principles forward, it is important that the protection afforded to these considerations is proportionate, reflects their importance, and that change in itself is not necessarily considered a negative impact. Clearly, when reaching the settlement/site specific elements of Plan-making, it will also be important to consider the mitigation and enhancement opportunities which can be delivered through development.</p> <p>? We note the reference to the Nature Recovery Network being promoted by WECA, and we will comment on this when it is formally published as part of the new Local Plan evidence base.</p> <p>Potential Guiding Principle 6:</p> <p>? We support the intention to ensure that new development creates a sense of place and character, and forms part of a comprehensive approach to creating communities. This is expressed within the current consultation on the changes to the NPPF and the associated National Design Guide, which will likely be in place prior to the next stage of consultation on the new Local Plan.</p> <p>? On page 73 the Consultation Document indicates that the previous levels of growth experienced by a particular area should be a relevant factor when considering the distribution of future growth. This should not be a consideration which is afforded any weight in the determining the Spatial Strategy as it is no indicator in itself of whether a settlement is well placed to deliver sustainable development in the future. Indeed, in some instances it would follow that areas</p>	

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	<p>which have historically been identified as suitable for development have experienced growth in part because they are the most sustainable locations within the Plan area and would thus likely be the starting point for the consideration of future growth. The ability of an area to accommodate growth is a material factor; however, this is the case for any area irrespective of historical delivery. Local Plan-making must consider the most appropriate strategy for an area, balancing all sustainability considerations, and shouldn't be based upon whether an area/village/town has already taken its 'fair share.'</p> <p>Building Blocks:</p> <p>We agree with the five building blocks identified, and these represent the full range of options available to South Gloucestershire. We consider Building Block 1 (Existing Urban Area) within more detail in our response to the Urban Lifestyles Strategy below.</p>	
BDW South West	<p>BDW agree that the likelihood of meeting all of the needs for new homes and jobs in the urban areas, within Building block 1, is low.</p> <p>BDW therefore firmly consider that building block 2 in the form of large urban extensions would allow for development at scale and offer connections and improved services to existing settlements.</p> <p>It is noted that this has historically been considered an acceptable growth strategy with the communities in the North and East Fringes.</p> <p>It is considered that capacity and potential exists for further sustainable development to facilitate required growth on land beyond the existing boundary of the Eastern Fringe and as such a strong focus should be placed here.</p>	19 Apr 2021
Bloor Homes	<p>Building Blocks:</p> <p>3.1 We agree with the recognition on page 64 that the final development strategy for South Gloucestershire is likely to compromise a mix of a number of the 'Building Blocks;' and all the options should remain under consideration at this time. We have the following specific comments to make:</p> <p>Building Block 1 - Existing Urban Area:</p> <p>3.2 We comment in Section 4 below on the Urban Lifestyles element of the strategy.</p> <p>Building Block 2 – Expanding our main urban areas through small or large urban extensions:</p> <p>3.3 It isn't clear from the consultation document whether this pertains to land immediately adjoining the main urban areas only. Development which has to traverse a Motorway cannot reasonably be considered an urban extension to an existing settlement. Thus there is not an option in the North Fringe to deliver this option, and it should not be included within this Building Block moving forward.</p>	01 Apr 2021

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	<p>Sustainability Appraisal and Building Blocks:</p> <p>3.4 The Sustainability Appraisal and Building Blocks as drafted do not currently reflect the consultation document. This must be corrected, and addressed appropriately as the nLP moves forward.</p> <p>3.5 The consultation document explicitly recognises that large scale growth within rural communities will be investigated at the next stage of the nLP consultation: see p120; Key Issue 25 (New Locations for Large Scale Growth), and referenced on p64 under Building Block 4.</p> <p>3.6 However, it is not assessed within the Sustainability Appraisal. Under Building Block 4, the Sustainability Appraisal explicitly references that the assessment relates to small and medium scale growth in the rural communities only.</p> <p>3.7 In accordance with the consultation document, the potential for large scale growth within villages must be assessed. This must be done as part of the initial consideration of the Spatial Strategy, and cannot be done retrospectively when the Plan moves to the stage of identifying sites. Section 4 (paragraph 4.34) of the Sustainability Appraisal will require review to include this as part of the next stage of the assessment to ensure the assessment takes the appropriate sequential approach.</p>	
<p>Bloor Homes and Maximus Strategic Warmley Ltd</p>	<p>Please see enclosed submission.</p> <p>3. IDENTIFYING POTENTIAL BUILDING BLOCKS:</p> <p>3.1 At this early stage of consultation we compliment the Council on its clear consultation document identifying potential sources of new land to meet the emerging development requirements. The articulation of different “building blocks” offers a simplistic introduction to the comparative assessment that will be required as the Council moves towards identifying particular locations and sites to accommodate its development requirements. Clearly a more complex comparative assessment will need to be made in due course through the Sustainability Appraisal and other mechanisms. Within this context we make the following broad comments.</p> <p>Building Block 1 – Existing urban areas:</p> <p>3.2 Clearly this is an important starting point when looking at how to accommodate further growth. Particular emphasis should be made on identifying the potential for previously developed land to meet the range of development requirements, but careful consideration will need to be made when looking at competing land uses within the urban area such as housing and employment. It will also be vital to ensure that important open spaces are not lost as an unintended consequence of urban intensification. We would urge the Council to do much more work in this respect as soon as possible. It will be helpful to articulate the scale of change envisaged for the existing community, this will be best understood with reference to specific sites. We have also suggested the benefits of an “urban capacity” approach</p>	<p>29 Mar 2021</p>

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	<p>to assessing the quantum of new development that could be delivered within the existing urban areas. It will be important to identify specific sites rather than rely simply on a “windfall assumption” which cannot be tested. The Council may wish to expand on its masterplanning approach to a large proportion of the existing urban area to assist in this respect. We often see that the existing community within an urban area does not engage in the Plan making process and does not respond to development proposals until specific Planning Applications in their locality – anything the emerging Local Plan can do to add much greater certainty earlier in the process would be welcomed. This would also assist in ensuring specific sites are identified and more detailed consideration can be given to exactly when they are likely to be deliverable over the Plan period and beyond – thus working towards a robust housing trajectory.</p> <p>Building Block 2 – Expanding our main urban areas through small or large urban extensions:</p> <p>3.3 Nationally, this is often seen as one of the most sustainable forms of development. Locally, it reflects the approach already seen over the years in seeking to identify sustainable opportunities through regional and local Plan making. In this respect there was a strong track record and evidence base to support development in this sort of location.</p> <p>Building Block 3 – Growth around our market towns:</p> <p>3.4 There may be opportunities for smaller-scale development, the scale of which needs to carefully reflect the characteristics of particular sites and settlements, the availability of services and facilities, the scale of infrastructure necessary and other key sustainability indicators on a site-by-site basis.</p> <p>Building Block 4 – Rural villages and settlements:</p> <p>3.5 Given the characteristics of South Gloucestershire, it is right to look here too but for maybe even smaller scale development, and again the NPPF offers guidance. Clearly the Sustainability Appraisal and other mechanisms will be particularly important to identify the scale of development at different locations based on particular site characteristics.</p> <p>Building Block 5 - Large scale freestanding new settlements:</p> <p>3.6 There is very little further consideration of this potential building block within the consultation document other than the headline which appears on page 65. We are obviously aware of previous new settlement proposals promoted by the Council through the JSP which had led to particular concerns in the respect of the relative un-sustainability, requirements for large scale infrastructure provision and long lead in times with significant questions over there deliverability and viability. We do not preclude new settlements going forward but they do present significant challenges within any particular Plan period.</p>	
Bloor Homes South West Ltd	SECTION 5 – STRATEGY - WHERE WILL NEW DEVELOPMENT GO?	25 Mar 2021

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- Land at North West Yate	<p>Building blocks:</p> <p>Five potential building blocks are set out that are proposed as the foundations to the development strategy, each block represents a potential approach to identifying locations for growth. The first of which is focusing development in existing urban areas, as is in line with national policy on Brownfield land. The aim to maximise density, via the efficient use of Brownfield (previously developed) land, is welcomed, although (as acknowledged in the consultation document) it will not be possible to meet all the development needs in this way.</p> <p>It needs to be recognised that Brownfield land is a finite resource and Brownfield sites are often slower to deliver than greenfield options. The Council's last full AMR (2019) sets out that between 2013 - 2019 an average of just 45% (range of 55 - 33% over 6 years) of homes delivered were on Brownfield sites. In addition, while higher densities are described as preferable these may not be deliverable (given the various constraints which are unique to each site) or desirable to local communities in specific parts of South Gloucestershire. Viability testing of this source of supply will be critical for the future stages of the Plan, so that it is clear that any assumed levels of capacity are realistic in terms of both deliverability, and the market appetite for delivery.</p> <p>As the consultation document acknowledges, the level of growth to be accommodated cannot be met through the first 'building block' (existing urban areas). Consideration should be given to a combination of approaches that includes urban extensions, growth at market towns and rural villages and settlements. With regard to the potential for new settlements, whilst it is appropriate to consider this at the initial stages of Plan preparation, clear and robust evidence will be needed should this be pursued. New settlements typically come with very significant lead in times, and frequently there are funding and or viability issues; reliance on this source of supply in the new Plan should not be at the cost of identifying suitable and available sites on the edge of existing settlements.</p>	
Bloor Homes South West Ltd - Land at South Farm	<p>SECTION 5 – STRATEGY - WHERE WILL NEW DEVELOPMENT GO?</p> <p>Building blocks:</p> <p>Five potential building blocks are set out that are proposed as the foundations to the development strategy, each block represents a potential approach to identifying locations for growth. The first of which is focusing development in existing urban areas, as is in line with national policy on Brownfield land. The aim to maximise density, via the efficient use of Brownfield (previously developed) land, is welcomed, although (as acknowledged in the consultation document) it will not be possible to meet all the development needs in this way.</p> <p>It needs to be recognised that Brownfield land is a finite resource and Brownfield sites are often slower to deliver than greenfield options. The Council's last full AMR (2019) sets out that between 2013 - 2019 an average of just 45% (range of 55 - 33% over 6 years) of homes delivered were on Brownfield sites. In addition, while higher densities are described as preferable these may not be deliverable (given the various constraints which are unique to each site) or desirable to local</p>	26 Mar 2021

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<p>Bloor Homes South West Ltd - Land at Wotton Road</p>	<p>Building blocks:</p> <p>Five potential building blocks are set out that are proposed as the foundations to the development strategy, each block represents a potential approach to identifying locations for growth. The first of which is focusing development in existing urban areas, as is in line with national policy on Brownfield land. The aim to maximise density, via the efficient use of Brownfield (previously developed) land, is welcomed, although (as acknowledged in the consultation document) it will not be possible to meet all the development needs in this way.</p> <p>It needs to be recognised that Brownfield land is a finite resource and Brownfield sites are often slower to deliver than greenfield options. The Council’s last full AMR (2019) sets out that between 2013 - 2019 an average of just 45% (range of 55 - 33% over 6 years) of homes delivered were on Brownfield sites. In addition, while higher densities are described as preferable these may not be deliverable (given the various constraints which are unique to each site) or desirable to local communities in specific parts of South Gloucestershire. Viability testing of this source of supply will be critical for the future stages of the Plan, so that it is clear that any assumed levels of capacity are realistic in terms of both deliverability, and the market appetite for delivery.</p> <p>As the consultation document acknowledges, the level of growth to be accommodated cannot be met through the first ‘building block’ (existing urban areas). Consideration should be given to a combination of approaches that includes urban extensions, growth at market towns and rural villages and settlements. With regard to the potential for new settlements, whilst it is appropriate to consider this at the initial stages of Plan preparation, clear and robust evidence will be needed should this be pursued. New settlements typically come with very significant lead in times, and frequently there are funding and or viability issues; reliance on this source of supply in the new Plan should not be at the cost of identifying suitable and available sites on the edge of existing settlements.</p>	<p>20 Apr 2021</p>
<p>Brian Hackland</p>	<p>I agree with the broad strategy set out in Chapter 5. However, the translation of that strategy into a spatial plan that sets out the location, nature and quantum of</p>	<p>26 Feb 2021</p>

Respondent Name	User Response: Text	Response Created
	<p>development will necessitate rigorous preparation of accurate, comprehensive and spatially consistent data to underpin this, as well as effective and respectful engagement by the authority with the local communities most affected by the proposals. South Gloucestershire will need to demonstrate not only that its proposals meet the needs identified, but that they do so in the most sustainable way in conjunction with related infrastructure (natural and built) plans.</p> <p>Clarity in the final plan needs to be matched by clarity in the preliminary iterations. For example: the term ‘urban’ is used to refer in some places in the consultation on the Local Plan 2020 to refer exclusively to the North and East Fringes of Bristol, in others to include Thornbury and Yate/Chipping Sodbury. At other times the latter are referred to as ‘market towns’, in distinction from the North and East Fringes. At times Thornbury and Yate are referred to as South Gloucestershire’s market towns, sometimes it is Thornbury and Yate/Chipping Sodbury, and at still others it is Thornbury, Yate and Chipping Sodbury. Experience of the JSP process made clear that such inconsistencies contributed to misunderstandings and confusion. For instance, it needs to be clear not only what the concept of ‘Urban Lifestyles’ means, but where it would be applied. The map on page 62 of the consultation document showing the ‘potential urban lifestyle areas’ shows the proposed area in Yate extending to, and including the Beeches Industrial Estate. While it makes sense to include the industrial estate in the Yate Masterplan, it is not clear how it would fit with ‘Urban Lifestyles’.</p>	
Bristol and England Properties (BEP)	<p>4.2 Urban Areas, which are generally home to a good level of existing services, facilities, employment opportunities and Public Transport connections, are considered to be among the most sustainable locations for development. As such, we are supportive of development within these areas which will, generally, be the most sustainable locations for new development.</p> <p>4.3 The difficulty is in anticipating a realistic quantum of development that will come forward from this source. We will comment further on any anticipated delivery from this source once this is more clearly defined in future consultations.</p> <p>4.4 Regardless, it is rightly acknowledged within the Phase 1 document and Sustainability Appraisal (SA) that this source will not be able to meet the development needs of the District on its own and other 'building blocks' will need to be utilised within the spatial distribution strategy.</p> <p>4.5 Urban Extensions are supported on the basis that the communities of the North and East Fringes already benefit from strong levels of employment, services, facilities and Public Transport connectivity and, therefore, there is good potential for development in these locations to achieve high standards of sustainability.</p> <p>4.6 The Bristol North Fringe in particular boasts a wide range of services, facilities and employment opportunities with excellent Public Transport connections between them. Its importance as an employment hub for South Gloucestershire is also highlighted on page 47 of the infographic with significant levels of in commuting to the area, relative to out commuting (which is generally toward Central Bristol).</p>	17 May 2021

Respondent Name	User Response: Text	Response Created
	<p>4.7 Given its importance and the limited scope for further growth within the confines of the M4/M5 boundary, careful consideration needs to be given in respect of how development can be sustainably delivered in order to take advantage of the service and employment provision within it. An appropriate level of growth at the villages around the Northern Fringe (e.g. Tockington and Olveston) would be well related to the Bristol Urban Fringe and could complement any strategic levels of growth which come forward elsewhere (e.g. along the A38 Corridor).</p> <p>4.8 For similar reasons, Market Towns are also generally considered to be sustainable locations for development, albeit their level of service and employment provision is below that of the Bristol Urban Fringes. The three Market Towns identified are Yate, Thornbury and Chipping Sodbury. Whilst we would generally support development at these locations, one needs to be mindful of both their capacity to expand further and the wider factors that influence sustainability at a macro level.</p> <p>4.9 For example, Thornbury has had significant levels of growth committed already at the town (c. 650 dwellings) which is expected to come forward over much of the Plan period. One may question whether there is enough latent demand to support further significant levels of growth under this Plan period, or if there needs to be a period of consolidation as existing commitments are built out.</p> <p>4.10 Turning to Chipping Sodbury, whilst it has not been subject to significant levels of growth in recent years, one would need to examine the benefits of directing development to this location against alternative options. Whilst it would have good access to Yate and reasonable Public Transport connections to the fringes of Bristol, one questions whether development here is truly best located to maximise opportunities for active/public modes of transport. For example, development at Frampton Cotterell/Coalpit Heath or the North West of Yate would be much better related to these key areas of the District and better placed to maximise active and Public Transport opportunities (e.g. MetroBus extension, the strategic rail network and key employment centres).</p> <p>4.11 As such, we generally only see Yate as a primary candidate in terms of being capable of delivering further large-scale growth within the most optimal sustainable strategy.</p> <p>4.12 The Rural Villages building block includes a number of settlements of varying size, significance and unique circumstances that will influence what level of development could come forward at them.</p> <p>4.13 For example, Frampton Cotterell, Coalpit Heath and Winterbourne are larger villages in and of themselves which all scored well in sustainability terms within the Rural Settlements Topic Paper[3]. In reality, the three settlements effectively function as a single entity with a range of services, facilities and employment opportunities across all three which complement each other to support the majority of the needs of their residents. These settlements could, therefore, be capable of accommodating significant levels of growth.</p>	

Respondent Name	User Response: Text	Response Created
	<p>4.14 Frampton Cotterell and Coalpit Heath specifically are set to benefit from a MetroBus route along the A432 Corridor which will provide a frequent and convenient connection between Yate and the Bristol Urban Fringe further enhancing its sustainability credentials.</p> <p>4.15 There is a clear distinction between settlements like this and those within tiers of the aforementioned Topic Paper which, whilst they benefit from some service provision, are simply not at the same 'level' as Frampton Cotterell in terms of access to services, facilities, Schools, employment opportunities or Public Transport connections.</p> <p>4.16 There is an excellent opportunity to deliver significant scales of growth at Frampton Cotterell, Coalpit Heath and Winterbourne and this was reflected in the fact that land was identified for strategic development in the JSP to the East of the 'conurbation.' However, there are other opportunities within the settlement that could be explored to complement large scale strategic growth. This includes our client's site in Frampton Cotterell.</p> <p>4.17 Beyond Frampton Cotterell, Coalpit Heath and Winterbourne, the majority of other rural villages do not benefit from as significant a provision of services, facilities, employment opportunities or Public Transport connections and so a more modest level of growth should be directed toward them. However, it is imperative that an appropriate level of development can come forward at the rural villages in the interests of maintaining their vitality and viability. This is important to address affordability issues within rural areas, breathe new life into communities and support existing services and facilities.</p> <p>[3] South Gloucestershire Local Plan Rural Settlements and Villages 2015 Topic Paper (November 2015).</p> <p>4.18 Villages such as Tockington and Olveston have a reasonable level of service provision within them, but have not been able to expand significantly in recent years as a result of the Green Belt constraints. This has exacerbated affordability issues within the village and put local services in danger of being lost (see above). Allocating a proportionate level of growth at villages such as these can help to support and enhance their vitality and viability and should be explored within the new Local Plan.</p> <p>4.19 New Settlements can also make a valuable contribution to housing supply where there has been a sound approach to securing their delivery in a timely manner. Excellent examples of this would include the delivery of Cranbrook in East Devon and Northstowe in South Cambridge.</p> <p>4.20 As acknowledged within the Consultation Document, careful consideration needs to be given to any identified opportunities. A significant level of reassurance will need to be provided that the needs of the new community will be met and that they will come forward in a reasonable timeframe.</p> <p>4.21 New physical infrastructure (generally transport related) is often required to</p>	

Respondent Name	User Response: Text	Response Created
	<p>facilitate their delivery. The cost of this can either be prohibitive, affect viability or require external funding sources to secure their delivery. The latter is often reliant on being obtained via specific bid cycles. This can, in turn, affect the timely delivery of such new settlements. This will need to be borne in mind, especially given the shorter Plan period compared with the JSP.</p> <p>4.22 It is also worth noting that viability considerations on strategic sites can adversely affect the delivery of other important benefits such as affordable housing. The East of Harry Stoke New Neighbourhood, for example, only considered capable of delivering around 25% affordable housing across the entire allocation without grant funding. This is significantly below the Core Strategy's overall affordable housing target of 35%. Non-strategic sites generally have the benefit of being able to deliver policy compliant levels of affordable housing (as a minimum).</p> <p>4.23 The quantum of affordable housing that can be secured on site should be a consideration for the Council when weighing up the merits of different locations for growth and in determining the split between strategic and non-strategic levels of growth.</p> <p>4.24 Once a set of sufficiently sustainable locations have been identified, deliverability should then be the key consideration in deciding which of these should be pursued. There are significant consequences associated with the failure of strategic sites to come forward (exacerbation of affordability issues, stymied economic growth, delays to key physical and social infrastructure etc). This is something that the Council should actively look to avoid.</p>	
Bristol Zoological Society	<p>Please see enclosed submission.</p> <p>Strategy – where will new development go?</p> <p>5.8 Within the scope of these representations (which focus in broad terms on the desire to see a supportive planning policy framework to realise the investment and growth opportunity of the Zoological Society’s core charitable purposes in South Gloucestershire) the Society’s comments are limited to noting that:</p> <p>5.9 First, much of the current consultation document is focused on the locational options to deliver new housing (and to a lesser extent employment development) land uses;</p>	25 Mar 2021
Caroline Phillips	<p>Existing urban areas is desirable as this could if developed responsibly ‘improve for the better’ appearance of a site/locality.</p> <p>Developments are dependent upon the context of each setting. Large developments in hamlets would only serve to distract from the feature/scale that make them appealing. Size of development should be dependent upon the size of the existing community they are aimed at. For example, Shortwood is a small semi- rural traditional hamlet of around 70 homes and is located approximately a mile away from Lyde Green Development (2500+ new homes). Any development should only be a small proportion i.e. 10% of the existing homes in the hamlet, otherwise the development is unsustainable and would drown the existing community.</p>	12 Mar 2021

Respondent Name	User Response: Text	Response Created
	<p>Green Belt or Greenfield land between developments would be at risk of becoming future infill where targeted developments are built away from existing settlements. Such land would need to be protected or developed for leisure and fitness activities and to improve the visual aspect of the landscape.</p>	
Cate Davidson - Sodbury Town Council	<p>Public transport to rural areas is still patchy and planners tend to view provision with rose tinted glasses. Hourly bus and train journeys will not prevent the use of cars. Bus and train stations need to be accessible by foot and bike, with good, cheap parking for those who have to drive.</p> <p>We need to protect our open spaces, many of which are already being swallowed up. The challenge to provide the amount of housing proposed is enormous, but establishing a new settlement is likely to consume a large amount of land with inadequate local facilities resulting in more cars on the road. We should try to build on what we have, use as much already developed land as possible, and optimise the density on this land, as the plan proposes.</p> <p>Historically developments have gone ahead with houses being built but the promised facilities never appearing. This applies to developments such as North Yate, but would equally apply to villages where facilities such as local shops have closed down. House building and establishing appropriate facilities must go hand in hand.</p>	03 Mar 2021
Catherine Bird	<p>Thornbury does NOT need or want any more new property's!!</p>	28 Feb 2021
Catherine Graham	<p>it would be useful to see where the 5 year land supply fits currently within those 5 building blocks.</p> <p>Where recent development (ie during last 5 years) has not adhered to the new principals and what is being done to address that.</p>	08 Feb 2021
CEG and the Charfield Landowners Consortium (CEGCLC)	<p>Please see accompanying covering letter.</p> <p>We agree that the building blocks represent a broad range of areas where housing growth might be located and they should not be mutually exclusive.</p> <p>We appreciate that housing requirements have not yet been fixed, however, the evidence base for the emerging JSP indicated that there was a very significant need for housing. Despite the JSP being withdrawn that position has not changed. Given the scale of housing need, it is helpful that the Issues and Approaches document acknowledges that the likelihood of meeting requirements in the urban areas is low. There will only be so much development that renewal, regeneration and re-use of urban and Brownfield land can provide.</p> <p>There should not be an over-reliance on development to the North and East of Bristol (Building Block 2). Significant expansion has occurred here in recent years, and more growth is planned. The Local Plan will, therefore, need to ensure that a tipping point is not reached in terms of further growth becoming unsustainable. The challenge is to recognise the benefits of locating development around Bristol as a</p>	23 Apr 2021

Respondent Name	User Response: Text	Response Created
	<p>sustainable location, but also the reality that seeking to locate too many homes in the North/East Fringes of Bristol could impact upon delivery rates and consequently investment in the local area. Housebuilders will only ever be able to maintain a set number of outlets working on site at a given point in time. Allocating more housing in an area already benefitting from a high amount of commitments is unlikely to have a proportionate impact upon housing delivery as developers will not necessarily be able to increase the number of working outlets by an amount relative to the size of the allocation/permission. It also must avoid overconcentrating growth in locations which already have significant commitments, which could risk delay and stagnation in housing delivery.</p> <p>The Local Plan must ensure 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. We, therefore, support the inclusion of Building Block 4 because rural villages and settlements have an important role to play in supporting sustainable economic growth. More specifically, Building Block 4 ensures that a number of different housing market areas are penetrated in order to meet geographical need and to ensure a consistent stream of housing completions. This will mean that different areas are able to benefit from the investment that new development can deliver.</p>	
Charlcombe Estates	<p>The five building blocks should not be seen as some form of sequential assessment. The most sustainable locations and sites for additional residential development should be identified.</p> <p>In that context, Charlcombe Estates controls land to the South of Tanhouse Lane, Engine Common which they consider eminently suitable for residential development (up to 8 dwellings). A Planning Application has been submitted and is currently being considered by the Planning Authority (P19/0284/O).</p>	04 Mar 2021
Chris Rich - Mizmo Communications Ltd	<p>The building blocks reflect the difference characteristics of places across the District.</p>	11 Mar 2021
Chris Stow	<p>When considering building blocks 1) to 3) my main concern would be that any development must still allow the existing and future residents to enjoy a quality lifestyle insofar as access to shops and services, schools and open space is not compromised. Sadly in the past there has been large scale housing development without additional shops and services which has been unsatisfactory for existing and new residents.</p> <p>With regard to building block 4) rural villages and settlements it has been my view for a long time that there should, at the very least, be an infill policing for allowing development within existing settlements or groups of houses in the rural and semi rural parts of the county,</p> <p>Many local authorities have such a policy and as long as the policy allows that development would reflect the existing settlement, with regard to house design and garden size etc, then such a policy if applied across South Gloucestershire would surely provide a considerable amount of additional housing, in many settlements or small groups of houses, without impacting on the countryside or existing services.</p>	08 Jan 2021

Respondent Name	User Response: Text	Response Created
	<p>I have often wondered why South Gloucestershire has on infill policy for development in the Green Belt, but not across the county as a whole!</p> <p>Build block 5) large scale freestanding new settlements. This would be my preferred choice for large scale development. In my earlier comments I have mentioned concern about new homes overwhelming existing services to the detriment of existing and future residents so a new freestanding community with appropriate shops, schools, services and other necessary infrastructure would be the best solution for a large housing need.</p>	
Christina Biggs - Friends of Suburban Bristol Railways	<p>Yes in principle, but only where a railway station or light rail line can be built, or a short walk, cycle or bus ride away. MetroBus on its own is not sufficient. FoSBR support the principle of Transport Focussed Development and commend the CPRE (Campaign for Protection of Rural England) detailed response on where housing should be located and in particular the need for higher density housing using the 3-4 storey Victorian build model. We also commend the approach taken by the ConnectedCities campaign group who advocate building within 1km of rail stations in a highly car-free environment, with green fingers extending radially to keep the rural environment.</p>	27 Feb 2021
Chris Willmore - Yate Town Council	<p>Page 60 – STRATEGY:</p> <ul style="list-style-type: none"> • ‘Potential Urban Lifestyle Locations’ the Yate area forms one of these – and Members will repeat what they have said before – when talking about optimising density SGC need to make clear that this isn’t about increasing density.... • We are deeply opposed to the idea of massive levels of new housing in our town centre. We would like to see our town centre redeveloped and modernized but have made clear that this has to be done in a way that ensures there is the flexibility of uses that our town centre needs for its future. We only have one town centre, and over the last 20 years have needed to use that for town wide provision that can ONLY happen centrally as that is the ONLY place that has the necessary transportation links and shared sense of ‘ownership.’ When we provide something at one side of town, that is 3 miles from the other side of town, and we end up with pressure to provide 2 of the facility. We therefore need to be able to respond to need in a single, central location. Redevelopment of our town centre for housing, puts that at risk. We have welcomed and will continue to welcome a more diverse town centre, which includes some additional residential uses, but we are deeply troubled by what lies behind the Urban Lifestyle Location. We would welcome uses that make the town more attractive for young people to stay, but this needs to be done in a way that also retains the flexibility and space for us to be able to meet new needs as they emerge – and we are not currently convinced that the models do that. We are still worried this will be interpreted as high density high-rise housing with minimum footprint facilities (our experience of for example the complete failure to meet Masterplan proposals for the Ladden Gardens district centre gives us good cause to remain extremely concerned). <p>Page 66 – INVESTIGATING THE GREEN BELT:</p> <ul style="list-style-type: none"> • We are completely opposed to Green Belt development and want action taken to 	16 Mar 2021

Respondent Name	User Response: Text	Response Created
	<p>protect and enhance what is left of it.</p> <p>Page 72 – Green infrastructure and nature recovery networks:</p> <ul style="list-style-type: none"> • We strongly support a holistic approach to these aspects. <p>Page 72 – Balance between local jobs and resident workers:</p> <ul style="list-style-type: none"> • We strongly support reducing need to travel for work and strongly support providing more, and more varied, local employment opportunities. 	
<p>Claire Dolman - Hanham Abbots Parish Council</p>	<p>Changes in working practices due to the Covid pandemic have meant that more people are working from home causing offices and industrial sites in city centres to be under populated and in some cases, empty. It could be that soon many buildings designated for commercial use will no longer be required for that purpose and could instead be used for housing. With this in mind, surely it would be sensible to delay the Local Plan if only to avoid concreting over greenspaces which would be lost forever.</p> <p>We believe that there are many important changes that have to be made to what was our “normal lives” before the pandemic and that now is an ideal opportunity to start to make these changes. The policy of allowing random house building has resulted in the loss of valuable land which could have been used more efficiently to build the type of housing that is really needed, so now the Local Plan should be seen as an opportunity to guide us away from those “old ways” whilst being aware of rapidly changing circumstances.</p> <p>Just to select a few examples, cycling has become very popular so schemes such as the Willsbridge – Keynsham cycling and walking initiative should be encouraged and supported. A survey of possible solar farm sites should be carried out. In High Streets, takeaways which are near schools should be encouraged to serve healthy options and should be inspected regularly to ensure that this happens. All takeaways should have to maintain the highest standards of hygiene with food sources shown, regular monitoring and strict enforcement. With housing and living arrangements, extensions and annexes should be considered over new builds with financial incentives available and there should be the highest quality of insulation on extensions and loft conversions. Houses in multiple occupation should be inspected on a regular basis to make better living for the residents, give them more protection and to make the concept of HMO’s more acceptable to the wider public.</p>	<p>25 Feb 2021</p>
<p>Claire Normoyle</p>	<p>Relates to pages 62 to 65:</p> <p>Growth within urban areas must do the heavy lifting for the authority’s housing requirement, over and above existing permissions and the windfall allocation. This fits precisely with the momentous shift in external factors since the aborted JSP, namely:</p> <ul style="list-style-type: none"> • The legal requirement to meet the zero-carbon target by 2030 • The fact that the way people use our city centres has probably changed for good as a result of changes in shopping patterns, the impact having been significantly accelerated by the legacy of COVID-19 • The devastating impact on Govt finances which means that no reliance may be placed on any infrastructure project that does not have specific irrevocably committed funding 	<p>19 Feb 2021</p>

Respondent Name	User Response: Text	Response Created
	<ul style="list-style-type: none"> • A realisation of the dangers of traffic pollution on public health which requires a major reduction in private car usage <p>This shift in priorities also accords with the Govt statement published on 16th December 2020 which states that “climate aspirations demand that we aim for a spatial pattern of development that reduces the need for unnecessary high carbon travel”. Clearly any pattern of development other than growth within urban areas would represent precisely such unnecessary high carbon travel.</p> <p>The shift in emphasis to meet housing demand from within urban areas will not be possible to accomplish using the existing free-market model which is based around landowners clubbing together with developers to promote their own greenfield sites. The Local Authority will need to retain a hands-on role to ensure the implementation of appropriate high quality, high density housing on brownfield land.</p> <p>Building block 2, in the form of large urban extensions, has the major advantage that it benefits from easy connectivity to transport corridors and proximity to potential employment without the need for use of the private car, and therefore should reasonably be a priority within the mix. We note that the tables on pages 45 and 46 combine to show that since the inception of the Core Strategy there has been huge growth in employment development around the North Fringe of Bristol, and it would seem appropriate to make use of the review of the greenbelt to test the suitability of this Building block 3 – growth around our market towns – is unnecessary to meet the housing allocation and should be avoided for the reasons highlighted above. Due to the historic boundary of the greenbelt that forms a semi-circle around the town, we have been bombarded by speculative planning applications, in response to challenges to 5-year land supply issues. As a result, growth has been in the form of a distended urban sprawl away from the town centre. This has resulted in impaired services and facilities and severe impacts on inadequate infrastructure. Almost half of the approved development is still to be built out. These historic market towns are exactly that, they are not urban conurbations. Greenfield development around the periphery of these locations totally contradicts Priorities 1 and 2.</p> <p>Building block 4 – rural villages and settlements – should see only modest growth appropriate to the needs of the individual communities. For the most part this will come through “windfall developments” of less than 9 houses, and it is therefore unlikely to be necessary to include in the Local Plan.</p> <p>Building block 5 – large scale, free standing new settlements – This should be the absolute last resort in the event of being unable to find sufficient housing in the other four building blocks. In this event, any such proposals should be considered in the context of which locations would least infringe priority 1 (locations that pursue a carbon neutral future). Specifically, we are implacably opposed to any suggestion of the resurrection of a 3,000 unit (or more) car-based satellite development at Buckover.</p> <p>Furthermore, our view is that any large scale, free standing development should be just that – its boundaries proportionately spaced from the next settlement and able to be truly stand-alone immediately with all appropriate infrastructure in place, without any day to day reliance on any other settlement.</p> <p>However, we note that the table on page 45 shows the only area with significant land safeguarded for employment and not yet developed is in Severnside, which is also near the potential site for a Freeport, as proposed by WECA, with a claim that</p>	

Respondent Name	User Response: Text	Response Created
	<p>it may create up to 50,000 new jobs. The fact that large areas have been designate as suitable for employment also suggests that sufficient flood protection has already been put in place with good transport connectivity. If so, this area may merit further investigation for new settlements.</p>	
<p>Claire Smith</p>	<p>Building block 2; expanding our main urban areas through small or large urban extensions As per the NPP building on greenbelt should be a last resort. The plan seems to suggest building on greenbelt is inevitable but i disagree. This should be a totally last resort and very small developments if there is no other option.</p> <p>Building block 4 rural villages and settlements large growth in rural settings should not be allowed as it ruins the character of the area and stretches services to its limits.</p> <p>Building block 5 Large scale free standing developments large growth in greenbelt should not be allowed as it ruins the character of the area.</p> <p>Investigating the green belt</p> <p>Building in the greenbelt should only occur in exceptional circumstances, which need to be provide as per the NPP.</p>	<p>26 Feb 2021</p>
<p>Clara Goss - Redrow Homes Ltd</p>	<p>The SGLP2020 identifies the following five building blocks;</p> <ol style="list-style-type: none"> 1. Existing urban areas; 2. Expanding main urban areas through small or large urban extensions; 3. Growth around market towns; 4. Rural villages and settlements; 5. Large scale free standing new settlements. <p>Pegasus consider that in order to accommodate the quantum of growth that will be required in South Gloucestershire by the WECA SDS that a Spatial Strategy comprising a mix of all the above is likely be required where it can be achieved in accordance with the sustainable priorities of the emerging Plan. No one building block will be able to deliver the development requirements of the SGLP2020 in its entirety, nor should a strategy be developed that comprises a sequential approach to the proposed building blocks.</p> <p>The capacity of the existing urban areas is not infinite and while the South Gloucestershire Annual Monitoring Report 2019[3] identifies that;</p> <p>"67% of completions were within the established urban areas of the East (25%) and North (42%) fringes of Bristol and the towns of Yate/Chipping Sodbury (7%) and Thornbury (9%),"</p>	<p>26 Apr 2021</p>

Respondent Name	User Response: Text	Response Created
	<p>The opportunities to continue to allocate; redevelop and regenerate sites in urban areas reduces as sites come forward and are delivered.</p> <p>While upcoming changes to Permitted Development Rights will assist Brownfield supply in the short term, the levels of delivery stated in Table 6.6. of the Annual Monitoring Report 2019, which demonstrates an average of 45% of gross completions 2013 - 2019 coming forward on Brownfield sites, cannot be relied upon in perpetuity as a source of supply for the purposes of the preparation of the SGLP2020.</p> <p>Brownfield sites can be subject to viability constraints as well as contamination, flood risk, heritage and Biodiversity constraints.</p> <p>The updated Lichfields Start to Finish report (Feb 2020)[4] states as a headline conclusion that the build out rate of green field sites was 34% greater than the equivalent Brownfield sites demonstrating that green field sites deliver faster than their Brownfield equivalents.</p> <p>[3] https://beta.southglos.gov.uk/wp-content/uploads/AMR-2019.pdf</p> <p>[4] https://lichfields.uk/media/5779/start-to-finish_what-factors-affect-the-build-out-rates-of-large-scale-housing-sites.pdf</p> <p>Pegasus support Building Block 2 in as far as it relates to the expansion of the existing Eastern fringe to include our client's site at Hambrook.</p> <p>Pegasus also support Building Block 4, investigating an appropriate level of sustainable growth in and around the village of Hambrook, which is currently located within the inner Green Belt, adjacent to the urban area and South of the M4. The M4 would provide a defensible Green Belt boundary which would endure beyond the Plan period in accordance with paragraph 139e) of the NPPF.</p>	
Clifton Homes (SW) Ltd	<p>Please see accompanying representations referenced:</p> <ul style="list-style-type: none"> • 482 A3 CC 250221 FINAL Local Plan Reps – Land North of Haw Lane, Olveston. <p>2.1 The Local Plan consultation document sets out five ‘building blocks’ which could form part of a Spatial Strategy for the delivery of homes and other development across SGC; these are set out as follows:</p> <ol style="list-style-type: none"> 1. Existing Urban Areas; 2. Urban Extensions; 3. Growth around Market Towns; 4. Rural Villages and Settlements; 	24 Mar 2021

Respondent Name	User Response: Text	Response Created
	<p>5. Large-scale free standing new settlements.</p> <p>2.2 We agree that Building Block 1 ‘Exiting Urban Areas, which involves a focus on regenerating Brownfield land and maximising the density of committed sites should be a priority for SGC, within the areas of the Bristol North and East Fringe, Yate and Thornbury (set out on page 63 of the Local Plan consultation document). However, at the next stage of the Local Plan process, we hope that further assessment work will robustly analyse the capacity of these areas to ensure that the defined number of homes that will come forward via this strategy can be ascertained, and the shortfall between that figure and the overall housing need identified and the strategy refined to include the others means by which these will be delivered.</p> <p>2.3 The previous work undertaken previously by NASH Partnerships ‘Maximising the potential of Urban Living,’ whilst a good starting point, was only ever designed to be a high-level assessment of potential land available in support of the JSP. As the SGC Local Plan is now focusing on site-specific allocations, it is our view that this evidence should be further developed to identify specific sites to redevelop and increase densities on. This should be the first step, which will then help identify what residual supply needs to be delivered elsewhere within the Authority area.</p> <p>2.4 There are a range of different types of settlements across South Gloucestershire, and therefore a vast array of issues to address which in our view could not be solved through the adoption of one specific ‘Building Block’ as a Spatial Strategy. It is our view that a blend of the Building Blocks should be put forward to address the different key priorities and issues raised within the consultation document, with a significant proportion of land being allocated on the edge of Bristol, followed by Market Towns, with rural towns and villages receiving a proportion of need to address their individual concerns (for example, sustaining local facilities, bringing in investment via CIL to local Parish Councils to spend on local infrastructure projects, and addressing surplus capacity available in Primary Schools).</p> <p>2.5 We do not agree with the principle of allocating a new freestanding settlement if this involves land at Buckover, or anywhere in the Northern periphery of South Gloucestershire, being pursued as a development option. We have set out on many occasions within our representations to the JSP why we did not agree with such an approach and how it scored very poorly in terms of sustainability assessment. The problems associated with such a strategy primarily relate to the impact this will have on Carbon emissions and air quality as it will result in residents travelling South to work in Bristol; and the infrastructure funding gap that was identified within the evidence base to the JSP as a result of needing to significantly extend the MetroBus infrastructure to the North.</p> <p>2.6 We therefore consider that a ‘blend’ of Building Blocks will be required to meet the needs of South Gloucestershire and unmet need from Bristol, which will include a review of Green Belt land and release for large scale allocation, followed by a proportionate level of development on the edge of Market Towns and Rural Villages/Settlements, such as Olveston, where Green Belt land release will also be required, albeit on a smaller scale.</p>	

Respondent Name	User Response: Text	Response Created
Colin Gardner - TRAPP'D	<p>Growth within urban areas must do the heavy lifting for the Authority's housing requirement, over and above existing permissions and the windfall allocation. This fits precisely with the momentous shift in external factors since the aborted JSP, namely:</p> <ul style="list-style-type: none"> • The legal requirement to meet the zero-Carbon target by 2030; • The fact that the way people use our City Centres has probably changed for good as a result of changes in shopping patterns, the impact having been significantly accelerated by the legacy of COVID-19; • The devastating impact on Govt finances which means that no reliance may be placed on any infrastructure project that does not have specific irrevocably committed funding; • A realisation of the dangers of traffic pollution on public health which requires a major reduction in private car usage. <p>This shift in priorities also accords with the Govt statement published on 16th December 2020 which states that “climate aspirations demand that we aim for a spatial pattern of development that reduces the need for unnecessary high Carbon travel.” Clearly any pattern of development other than growth within urban areas would represent precisely such unnecessary high Carbon travel.</p> <p>The shift in emphasis to meet housing demand from within urban areas will not be possible to accomplish using the existing free-market model which is based around landowners clubbing together with developers to promote their own greenfield sites. The Local Authority will need to retain a hands-on role to ensure the implementation of appropriate high quality, high density housing on Brownfield land.</p> <p>Building block 2, in the form of large urban extensions, has the major advantage that it benefits from easy connectivity to transport corridors and proximity to potential employment without the need for use of the private car, and therefore should reasonably be a priority within the mix. We note that the tables on pages 45 and 46 combine to show that since the inception of the Core Strategy there has been huge growth in employment development around the North Fringe of Bristol, and it would seem appropriate to make use of the review of the Green Belt to test the suitability of this land.</p> <p>Building block 3 – growth around our market towns – is unnecessary to meet the housing allocation and should be avoided for the reasons highlighted above. Due to the historic boundary of the Green Belt that forms a semi-circle around the town, we have been bombarded by speculative Planning Applications, in response to challenges to 5-year land supply issues. As a result, growth has been in the form of a distended urban sprawl away from the town centre. This has resulted in impaired services and facilities and severe impacts on inadequate infrastructure. Almost half of the approved development is still to be built out. These historic market towns are exactly that, they are not urban conurbations. Greenfield development around the</p>	15 Mar 2021

Respondent Name	User Response: Text	Response Created
	<p>periphery of these locations totally contradicts Priorities 1 and 2.</p> <p>Building block 4 – rural villages and settlements – should see only modest growth appropriate to the needs of the individual communities. For the most part this will come through “windfall developments” of less than 9 houses, and it is therefore unlikely to be necessary to include in the Local Plan.</p> <p>Building block 5 – large scale, free standing new settlements – This should be the absolute last resort in the event of being unable to find sufficient housing in the other four building blocks. In this event, any such proposals should be considered in the context of which locations would least infringe Priority 1 (locations that pursue a Carbon neutral future). Specifically, we are implacably opposed to any suggestion of the resurrection of a 3,000 unit (or more) car-based satellite development at Buckover.</p> <p>Furthermore, our view is that any large scale, free standing development should be just that – its boundaries proportionately spaced from the next settlement and able to be truly stand-alone immediately with all appropriate infrastructure in place, without any day to day reliance on any other settlement.</p> <p>However, we note that the table on page 45 shows the only area with significant land safeguarded for employment and not yet developed is in Severnside, which is also near the potential site for a Freeport, as proposed by WECA, with a claim that it may create up to 50,000 new jobs. The fact that large areas have been designated as suitable for employment also suggests that sufficient flood protection has already been put in place with good transport connectivity. If so, this area may merit further investigation for new settlements.</p>	
Crest Nicholson South West Ltd	<p>CNSW agree that the likelihood of meeting all of the needs for new homes and jobs in the urban areas, with Building block 1, is low but would suggest much more consideration is given to Building Block 4, rural villages and settlements.</p> <p>Building Block 4 looks to investigate the potential for an appropriate level of sustainable growth (large scale or small and medium scale) in and around the wide range of rural villages and settlements in the District.</p> <p>Much more detail is required to establish the level of development that is possible in these areas and the ability for them to accommodate larger scale growth which in turn could create much more sustainable, but still rural, settlements.</p> <p>CNSW are pleased however that specific attention is being paid to the role that development in and around rural villages and settlements is being afforded at this stage in the Local Plan.</p>	15 Mar 2021
D. Hemmings	See attached representations.	23 Apr 2021
Dan Erben - Thornbury Market Garden	Please see answers above. Urban Areas need to be prioritised and New Settlements need to be entirely stopped, except small settlements no larger than 3 households meeting high sustainability criteria (local employment, minimum commuting, minimising negative environmental impacts and demonstrating some positive	23 Feb 2021

Respondent Name	User Response: Text	Response Created
	environmental impacts and high standards of sustainable building).	
Daphne Dunning - Pucklechurch Parish Council	<p>In principle it is entirely appropriate to identify a range of options to provide for growth across different settings – what has been presented on paper is sensible at a high level but the efficacy of this approach will only become apparent when the detail of the proposed development locations becomes known. Without an understanding of what proportion will need to be/or is anticipated to be delivered by each of these blocks it is hard to visualise potential impacts and outcomes.</p> <p>As per comments made relevant to Q3 Council is aware of the need to investigate sites that may currently be designated as ‘green field’ and Green Belt and understands that 40% of South Gloucestershire is designated Green Belt – this means that 60% is not. Also, the Bristol & Bath Green belt should be seen as a whole and not redesignated piecemeal without taking this into account across all the Unitary authority areas – in this respect therefore PPC would strenuously support the principle that consideration should only be given to building on Green Belt land after brownfield, urban and non-Green Belt options, including any potential capacity within our neighbouring authorities, have first been investigated. PPC would like to see an up to date strategic Green Belt assessment produced for whole plan area as was produced to inform the WECA Joint Spatial Plan as this is now 6 years out of date and does not take account of the impact that planned development such as that at Emerson’s Green East has had on encroachment of the countryside. This assessment should be cross-referenced to Landscape Character Assessments – it is a fallacy that Green Belt is unused, topographically flat, and therefore ripe for development.</p> <p>From observing the five building blocks, each and every idea seems relevant to our communities if the guiding principles are adhered to. It is important to enhance our existing urban areas to meet the needs of our communities as well as assessing our areas to identify new settlements. It is clear that we are suffering from a lack of housing to meet the demand and each of the 5 building blocks can play a part in helping to relieve this issue.</p> <p>With the increase of housing and homes there is a massive need to increase the medical provision for these people. The need for more hospital, and GP surgeries. The infrastructure needs to be put in place at the time of construction.</p> <p>Problem with investigating the green belt for building and your statements are contradictory stating both the need to investigate using green belt yet the importance of keeping green belt and open green space for recreation and access to nature for health. All other lands should be investigated before investigating green belt.</p> <p>Additional information Existing urban areas is desirable as this could if developed responsibly ‘improve for the better’ appearance of a site/locality. Developments are dependent upon the context of each setting. Developments in hamlets would only serve to distract from the feature/scale that make them appealing. Development would therefore not be desirable. Developments in the ‘Greenbelt’ would simply only lead to future infill and the loss of green spaces.</p>	08 Apr 2021

Respondent Name	User Response: Text	Response Created
	<p>Page 72 ? Plan for a better balance between local jobs and resident workers in our communities Depends on the jobs. Difficult to categorise some occupations where travel will be inevitable. This may drive moving from an area with increasing density of population.</p> <p>Page 73 ? Ensuring that we protect a ‘sense of place and character’ when we plan for new development – Lyde Green is a perfect example which has not demonstrated this. What will the council do to address this in future development?</p> <p>AGREE WITH THIS STATEMENT “Previous levels of growth experienced by a particular area may also be a relevant factor when considering proposals for new development. Consideration will be given to the context of the existing community and the proposed development, as well as the area’s ability to accommodate further growth”</p> <p>Page 74 Next page what happens next We need to be careful that call for sites is not the driver for development and suitability is carefully considered. The concern is where a decision that benefits a minority will impact a majority negatively.</p>	
David George	If new settlements are considered they have to be along existing corridors of mass public transport routes or attached to existing established shopping centres. To develop any large new residential development reliant on the aspiration of future infrastructure investment will not meet looming carbon reduction targets	15 Feb 2021
David Grover	Mental health impact on residents in villages where new developments are planned needs to be considered. Most people who live in smaller villages choose to live there because of location and low population (the core reason why they are titled villages). Many residents choose to live in these low population density areas for specific reasons. If new developments are created, they change population density, green space declines and pollution levels rise significantly (noise, emissions etc.). If a small village has no amenities, increasing population increases the need to travel to areas where these amenities can be found. This adversely affects original residents mental health.	25 Feb 2021
David Hathaway	It is essential that you define your terms ‘small’, ‘medium’ and ‘large’. This topic cannot be discussed if people have different concepts of what a medium development is. Definitions can be made in absolute terms (number of houses), or in relative terms (percentage of existing settlement), or a combination.	27 Feb 2021
David Heape	<p>Existing urban areas is desirable as this could if developed responsibly ‘improve for the better’ appearance of a site/locality.</p> <p>Developments are dependent upon the context of each setting. Large developments in hamlets would only serve to distract from the feature/scale that make them appealing. Size of development should be dependent upon the size of the existing community they are aimed at. For example, Shortwood is a small semi- rural traditional hamlet of around 70 homes and is located approximately a mile away</p>	12 Mar 2021

Respondent Name	User Response: Text	Response Created
	<p>from Lyde Green Development (2500+ new homes). Any development should only be a small proportion i.e. 10% of the existing homes in the hamlet, otherwise the development is unsustainable and would drown the existing community.</p> <p>Green Belt or Greenfield land between developments would be at risk of becoming future infill where targeted developments are built away from existing settlements. Such land would need to be protected or developed for leisure and fitness activities and to improve the visual aspect of the landscape.</p>	
David Price	<p>3.0 Spatial Strategy:</p> <p>It is recognised that the interests of sustainable growth for new housing and employment development are best served by directing expansion mainly towards the edge of urban centres. This is the Spatial Policy of the current Plan. However, the Council have rightly recognised that the heavy emphasis on a small number of large sites has not delivered the housing numbers anticipated. This consequently has put considerable pressure on the robustness of the housing land supply and the imperative for the Council to maintain a 5-year supply of housing land.</p> <p>The existing Core Strategy did not provide for additional growth in rural villages and centres outside Yate, Chipping Sodbury and Thornbury. The practical effect of this policy and the challenges of defending a robust 5-year housing land supply has arguably resulted in speculative developments.</p> <p>It is proposed that the current reliance on a small number of large urban extensions should be modified to allow for a range of different size of sites to be considered for development. The owners support the Council's aim of building resilience into the housing land supply. To achieve this, they suggest that the Council pursues a policy that allows for a portfolio of different sized development sites in a variety of locations to be permitted. The owners of this site contend that this approach is positively advantageous to the Council as it allows smaller sites, which are very often more quickly deliverable to be developed to usefully assist housing land supply.</p> <p>This approach would also be consistent with the NPPF's direction that small sites should form part of the supply and encourage development by SMEs which in turn aids more locally distinctive homes.</p> <p>In view of the above the owners of the property would positively support a Local Plan policy which also acknowledged the need for some growth in rural villages in the District, including Wickwar. With the services and facilities available in the settlement Wickwar is considered to be a sustainable location for housing development.</p>	25 Mar 2021
David Redgewell - South West Transport Network and Railfuture	<p>We need to create key village with Post Office, Schools, community facilities, shops, employment facilities, Garages and on key Public Transport routes.</p> <p>A clear list of key service village needs to be included in the Plan.</p> <p>Kingswood town centre is of course only partly in South Gloucestershire. The rest</p>	28 Feb 2021

Respondent Name	User Response: Text	Response Created
Sevenside	of the High Street shopping area is in the city and county of Bristol. In Two Mile Hill.	
David Reynolds	Rural villages should not have development imposed on them. Development impacts these communities far greater than development in urban areas.	28 Feb 2021
Debbie Johnson	Redevelop brown sites and run down urban areas, invest in a new town without impacting on the over stretched rural areas. You also need to prioritise infrastructure because without proper roads, utilities, schools etc the existing infrastructure can't cope with new builds already being built.	26 Feb 2021
Derek Fletcher - Wickwar Youth Centre	Rural village developments should not be permitted unless the necessary facilities are provided.	18 Feb 2021
Diverse Partnerships (In Collaboration With Edward Ware Homes)	Please see submitted Local Plan 2020 Phase 1 Issues and Approaches Consultation Response Document.	05 May 2021
Dominick Veasey - Nexus Planning Limited	<p>These representations are submitted on behalf of who have interests in Land surrounding the former Shortwood Golf Course, Mangotsfield ("the Lower Shortwood Site"). For reference a Site Location Plan is included as Appendix A.</p> <p>As part of the recent Call for Sites process, a Lower Shortwood Vision Document and accompanying Transport Vision was submitted. The Vision Document sets out the vision for creating a new settlement on the Eastern Fringe of Bristol that comprises a collection of distinctive neighbourhoods with the principles of sustainability, health and well-being at their core. These representations should be read alongside the Lower Shortwood Vision Document and Transport Vision.</p> <p>The Spatial Strategy underpinning both the emerging West of England Spatial Development Strategy (SDS) and the Local Plan should follow a bottom-up evidence based approach. In view of this, we support the broad principle of developing and testing key building block approaches. However, as Local Plan preparation progresses consideration will also need to be given to how the South Gloucestershire building blocks align with and support the wider sub-regional development needs and spatial priorities. For example, the most appropriate and sustainable locations to help meet unmet needs arising from Bristol City are likely to be within or adjoining the existing Bristol urban fringe, as opposed to locations detached and increasingly distant from the City.</p> <p>Building Block 1: Existing Urban Areas:</p> <p>We broadly agree with the principal of Building Block 1 (existing urban areas), particularly given making the best use of previously developed sites and where possible focusing development within existing urban areas and transport hubs are long standing national planning policy objectives.</p> <p>However, reliance on existing urban areas alone will not deliver the quantum or type of dwellings required over the Local Plan period. Delivery of family housing</p>	19 Mar 2021

Respondent Name	User Response: Text	Response Created
	<p>with private gardens in urban locations can be challenging. Due to higher land remediation costs, the delivery of affordable housing can also be challenging on urban sites. Delivery of key infrastructure, such as expanding existing Schools, or providing new Schools can again be difficult to accommodate within urban areas. A joint approach using both urban areas and sustainable greenfield locations is therefore required. In view of this, we agree within the consultation document that growth will also need to be accommodated on land currently outside of existing urban areas i.e. greenfield sites.</p> <p>In addition to South Gloucestershire’s own housing needs there is likely to be significant unmet housing needs arising from Bristol City, given that previous urban capacity work undertaken as part of the former West of England Joint Strategic Plan (JSP) process would suggest that only around 24% of Bristol City’s current Standard Method minimum housing figure can be physically met within the administrative area of the City.</p> <p>Building Block 2: Expand Main Urban Areas Through Urban Extensions:</p> <p>As set out with the Lower Shortwood Vision Document, the Lower Shortwood Site is geographically well placed to help meet development needs arising within both South Gloucestershire and Bristol City. Migration flow trends and commuting flow data consistently show that South Gloucestershire has a very strong and direct relationship with Bristol City compared with other Authorities within the sub-region. In view of this, we therefore advocate the application of Building Block 2 as this would provide much needed housing and development in the closest proximity to where need is arising over the Local Plan period.</p> <p>With regard to the North and North East Fringe, it is acknowledged that these urban fringe locations have been the focus for growth within previous development plans. However, the fact remains that the Bristol Fringe continues to be a very sustainable location within which to meet South Gloucestershire’s and Bristol City’s current and future housing needs. In view of this we strongly support the continued focus for growth within the Bristol Fringe i.e. Building Block 2.</p> <p>Over the period covered by the emerging Local Plan (2020 to 2036) it is noted from the housing supply trajectory within the South Gloucestershire AMR 2019 (the most recently published) that there are a number of legacy housing allocations within the Northern Fringe area that are either in the very preliminary stages of construction, or have yet to be determined Planning Applications (namely Harry Stoke/Stoke Gifford (763 dwellings), Cribbs/Patchway (3,500 dwellings) and East Harry Stoke (1,300 dwellings). We therefore question the extent to any additional strategic housing growth should be focused within Bristol City’s Northern Fringe over the emerging Local Plan period.</p> <p>However, as set out within the Lower Shortwood Vision Document the Eastern Fringe is well placed to be the focus for Bristol City urban fringe growth, as legacy housing allocations will have competed by the time the emerging Local Plan is adopted (2023/24).</p>	

Respondent Name	User Response: Text	Response Created
	<p>Indeed the principal of residential-led development and release of the land from the Green Belt in this location was previously subjected to significant independent examination scrutiny and endorsed via the South West Regional Spatial Strategy (RSS) process. The Government 's Draft Revised Regional Spatial Strategy for the South West Incorporating the Secretary of State's Proposed Changes identified the East Fringe, which includes the Lower Shortwood Site, as an 8,000 new homes Area of Search.</p> <p>However, at the time the proceeding South Gloucestershire Core Strategy (Local Plan) was being prepared, the RSS system was in the process of being revoked and the Council rejected the East Fringe Area of Search, beyond that already allocated in the 2006 Local Plan (Emersons Green). Whilst the Core Strategy Inspector accepted the approach within the Core Strategy, the Inspector did conclude:</p> <p>"I consider that as part of the review of the CS [Core Strategy] the Council should explore the potential of the East Fringe both as a longer-term resource and as a means of providing flexibility to meet needs should circumstances change during the Plan Period.</p> <p>Building Block 3: Growth around Market Towns:</p> <p>Whilst it is accepted that there will be housing and development needs arising at the three market towns over the Local Plan period we are mindful, there are already significant legacy housing allocations at these three market towns which, by reference to the AMR 2019 housing supply trajectory, are either in the very preliminary stages of construction, or have yet to be determined Planning Applications. For example in the period post 2023/24 (the monitoring year the emerging Local Plan is expected to be adopted) the Council already envisage 1,200 homes to be delivered at Yate and 355 at Thornbury.</p> <p>Housing delivery on these legacy allocations are therefore largely expected over the emerging Local Plan period i.e. post 2023/24 onwards. We therefore question the extent to any additional strategic housing growth at the three market towns will be deliverable over the Local Plan period. The local housing market associated with these market towns would be unable to accommodate additional strategic growth above that already planned.</p> <p>Given Thornbury's distance from Bristol City Centre (circa 18km) we would fundamentally question the extent to which focusing additional growth at the settlement could help meet unmet needs arising from the City. The same can also be said for Yate and Chipping Sodbury albeit these market towns are in marginally closer proximity (circa 15km). The most sustainable and sequentially preferable location to help meet needs arising from Bristol City is within the settlements existing urban fringe i.e. Building Block 2.</p>	
Donna Simmons - Emersons Green Town Council	<ul style="list-style-type: none"> • There should be no changes or development on 'green belt' land 	01 Mar 2021

Respondent Name	User Response: Text	Response Created
Edward Ware Homes	<p>4.1 The building blocks identified broadly form the principal locations that one would expect to see a Local Plan utilise to deliver the development needs of the District. Typically, it will be combination of most, if not all of these, that would help to secure the development needs of a District and achieve an appropriate balance between sustainability and deliverability.</p> <p>4.2 Urban Areas, which are generally home to a good level of existing services, facilities, employment opportunities and Public Transport connections, are considered to be among the most sustainable locations for development. As such, we are supportive of development within these areas which will, generally, be the most sustainable locations for new development.</p> <p>4.3 The difficulty is in anticipating a realistic quantum of development that will come forward from this source. We will comment further on any anticipated delivery from this source once this is more clearly defined in future consultations.</p> <p>4.4 Regardless, it is rightly acknowledged within the Phase 1 document and Sustainability Appraisal (SA) that this source will not be able to meet the development needs of the District on its own and other 'building blocks' will need to be utilised within the spatial distribution strategy.</p> <p>4.5 Urban Extensions are supported on the basis that the communities of the North and East Fringes already benefit from strong levels of employment, services, facilities and Public Transport connectivity and, therefore, there is good potential for development in these locations to achieve high standards of sustainability.</p> <p>4.6 The Bristol North Fringe in particular boasts a wide range of services, facilities and employment opportunities with excellent Public Transport connections between them. Its importance as an employment hub for South Gloucestershire is also highlighted on page 47 of the infographic with significant levels of in commuting to the area, relative to out commuting (which is generally toward Central Bristol).</p> <p>4.7 Given its importance and the limited scope for further growth within the confines of the M4/M5 boundary, careful consideration needs to be given in respect of how development can be sustainably delivered in order to take advantage of the service and employment provision within it. This may necessitate the identification of a new settlement/settlements which are well related to the Northern Fringe, rather than a physical extension to it.</p> <p>4.8 Development along the A38 corridor at Woodhouse Down would be well placed to achieve this given its proximity to the Northern Fringe, scope to deliver strong walking and cycling routes and the opportunity to take advantage of an already planned MetroBus extension to Thornbury in the emerging Joint Local Transport Plan.</p> <p>4.9 For similar reasons, Market Towns are also generally considered to be sustainable locations for development, albeit their level of service and employment provision is below that of the Bristol Urban Fringes. The three Market Towns</p>	05 May 2021

Respondent Name	User Response: Text	Response Created
	<p>identified are Yate, Thornbury and Chipping Sodbury. Whilst we would generally support development at these locations, one needs to be mindful of both their capacity to expand further and the wider factors that influence sustainability at a macro level.</p> <p>4.10 For example, Thornbury has had significant levels of growth committed already at the town (c. 650 dwellings) which is expected to come forward over much of the Plan period. One may question whether there is enough latent demand to support further significant levels of growth under this Plan period, or if there needs to be a period of consolidation as existing commitments are built out.</p> <p>4.11 Turning to Chipping Sodbury, whilst it has not been subject to significant levels of growth in recent years, one would need to examine the benefits of directing development to this location against alternative options. Whilst it would have good access to Yate and reasonable Public Transport connections to the fringes of Bristol, one questions whether development here is truly best located to maximise opportunities for active/public modes of transport. For example, development at Coalpit Heath or the North West of Yate would be much better related to these key areas of the District and better placed to maximise active and Public Transport opportunities (e.g. MetroBus extension, the strategic rail network and key employment centres).</p> <p>4.12 As such, we generally only see Yate as a primary candidate in terms of being capable of delivering further large-scale growth within the most optimal sustainable strategy.</p> <p>4.13 The Rural Villages building block includes a number of settlements of varying size, significance and unique circumstances that will influence what level of development could come forward at them.</p> <p>4.14 For example, Coalpit Heath/Frampton Cotterell/Winterbourne are larger villages in and of themselves which all scored well in sustainability terms within the Rural Settlements Topic Paper [4]. In reality, the three settlements effectively function as a single entity with a range of services, facilities and employment opportunities across complementing each other to support the majority of the needs of their residents.</p> <p>4.15 Coalpit Heath specifically is set to benefit from a MetroBus route along the A432 corridor which will provide a frequent and convenient connection between Yate and the Bristol Urban Fringe further enhancing its sustainability credentials.</p> <p>4.16 There is a clear distinction between settlements like this and those within the 'Acceptable Access' Tier of the aforementioned Topic Paper which, whilst they benefit from some service provision, are simply not at the same 'level' as Coalpit Heath/Frampton Cotterell/Winterbourne in terms of access to services, facilities, employment opportunities or Public Transport connections.</p> <p>4.17 There is an excellent opportunity to deliver significant scales of growth at Coalpit Heath and this was reflected in the fact that our client's site was identified</p>	

Respondent Name	User Response: Text	Response Created
	<p>as part of a SDL in the JSP. The site, along with Bloor's interest to the South, is an excellent candidate for allocation given its existing and potential sustainability credentials.</p> <p>4.18 We would welcome an amendment to the settlement hierarchy which distinguishes certain rural villages as capable of accommodating significant growth (i.e. Coalpit Heath/Frampton Cotterell/Winterbourne) from those where more modest scales of growth should/could come forward.</p> <p>[4] South Gloucestershire Local Plan Rural Settlements and Villages 2015 Topic Paper (November 2015).</p> <p>4.19 New Settlements can also make a valuable contribution to housing supply where there has been a sound approach to securing their delivery in a timely manner. Excellent examples of this would include the delivery of Cranbrook in East Devon and Northstowe in South Cambridge.</p> <p>4.20 As acknowledged within the Consultation Document, careful consideration needs to be given to any identified opportunities. A significant level of reassurance will need to be provided that the needs of the new community will be met and that they will come forward in a reasonable timeframe.</p> <p>4.21 New physical infrastructure (generally transport related) is often required to facilitate their delivery. The cost of this can either be prohibitive, affect viability or require external funding sources to secure their delivery. The latter is often reliant on being obtained via specific bid cycles. This can, in turn, affect the timely delivery of such new settlements. This will need to be borne in mind, especially given the shorter Plan period compared with the JSP.</p> <p>4.22 Once a set of sufficiently sustainable locations have been identified, deliverability should then be the key consideration in deciding which of these should be pursued. There are significant consequences associated with the failure of strategic sites to come forward (exacerbation of affordability issues, stymied economic growth, delays to key physical and social infrastructure etc). This is something that the Council should actively look to avoid.</p> <p>4.23 Even where they are considered to be viable, new settlements can often have long lead in times. The proposed Plan period extends for a period of only 15 years. The JSP's proposed Garden Village at Buckover had a lead in time of 10 years which we previously considered to be on the edge of reasonable. Assuming this was carried forward again, this would leave only around 5 years for completions to come forward to contribute to housing supply. This is partly due to the reliance on upgrades to Junction 14 of the M5 being in place before development can come forward.</p> <p>4.24 There are both more sustainable and more deliverable locations worthy of exploration. Land at Woodhouse Down would not require the provision of significant infrastructure to come forward, would have a much shorter lead in time, be less reliant on other sources of funding to be delivered and would make a more</p>	

Respondent Name	User Response: Text	Response Created
	<p>meaningful contribution to housing delivery over the Plan period compared to alternatives such as Buckover.</p> <p>4.25 Its relationship to the North Bristol Fringe and location along the proposed MetroBus extension route to Thornbury also means it can take advantage of an existing transport infrastructure commitments, rather than requiring this to be extended just to make it sustainable (as would be the case with Buckover).</p>	
<p>EG Carter & Co Limited and Sovereign Housing Association</p>	<p>7. The Strategy – Where will new development go?</p> <p>7.1 The view expressed that a new strategy is required as part of the Local Plan 2020 in order to identify areas to locate a large number of new homes, space for jobs, supporting services, facilities and infrastructure is supported. It is recognised that it is not appropriate to simply extend or re-work the existing strategy in the Core Strategy (Policy CS5), which may not last the test of time over the next fifteen to twenty years and does not deal with the future growth of the Severnside economic area in a holistic manner alongside infrastructure delivery.</p> <p>7.2 It is sensible to start with considering how development can be accommodated within the urban areas, but it is recognised that this needs to be balanced with the potential impacts on amenity and the ability to meet development standards and a large number and mix of housing types in existing built-up areas on Brownfield sites. It is considered that the Council have adopted a sensible approach to this and are realistic that the assessment of urban capacity and potential around smaller settlements, which will also have a role to play in meeting needs will likely lead to further greenfield release.</p> <p>Potential Guiding Principles:</p> <p>7.3 The concept of applying the six guiding principles which could help inform the development of a new growth strategy is recognised. It is important that these principles are considered and applied in and Spatial Strategy having regard to a robust and up to date evidence base and the full breath of sustainable development objectives being pursued by the LP.</p>	<p>27 Apr 2021</p>
<p>Ellandi LLP On Behalf of Crestbridge Corporate Trustees Ltd and Crestbridge T...</p>	<p>The extent of greenfield development will need to be carefully assessed for each location to ensure that balanced communities are delivered. Achieving the correct balance will also be necessary to stop urban lifestyle projects seeking intensification of Brownfield land being undermined if greenfield delivery would significantly harm demand and/or remove infrastructure capacity at the expense of Brownfield regeneration. Flexibility in housing supply must therefore ensure any early release of greenfield sites supports Brownfield regeneration projects that will necessarily be delivered over the lifetime of the new Local Plan.</p>	<p>05 May 2021</p>
<p>Emma Jarvis</p>	<p>Cannot agree with a strategy which meets a document that is unavailable i.e. The WECA Spatial Development Strategy.</p> <p>I agree with building blocks 1 to 4.</p> <p>I agree with investigating the Green Belt. With Building Block 4 both villages and settlements within and outside of the green belt should be considered. Some</p>	<p>28 Feb 2021</p>

Respondent Name	User Response: Text	Response Created
	<p>villages in the Green Belt have been starved of development for many years due to planning policy to the detriment of their schools, pubs, clubs and businesses. They would benefit from sensitive expansion. Instead of debating whether 'Yes' or 'No' in green Belt it would be easier to place a cap on how much development could take place within and outside a settlement in the Belt e.g a 10% max if in Green Belt and 20% max if not in the Belt, or 15% if in Green Belt and 20% if not in the Belt etc. This at least acknowledges that the Green Belt has a limiting factor compared to other locations.</p> <p>I do not agree with building block 5 in any large greenfield area. New standalone settlements should not be required and should not be given the same weighting as blocks 1 to 4. The existing settlements, whether in or out of green belt, should be studied first before Building Block 5 is even tabled as an option for consideration. New settlements means that the majority investment is solely directed to new residents and not to improving connectivity and infrastructure for existing communities. There are already at least 59 settlements according to the SGC diagrams, why add more settlements when the existing ones can be 'revitalised' and expanded? These places already have an established heart, character and a community and many already have some infrastructure, e.g. schools, village shops, community centres, businesses, churches, clubs and pubs which would be supported by new residents.</p> <p>A freestanding new village settlement cannot provide suitable jobs for the majority of its residents, neither can it provide a wide enough range of facilities to keep them sustainably contained, even city centres have people commuting to other areas for work, retail and leisure at their own free will.</p> <p>Consider development zones in pockets that follows the route of the railway lines through the county, like beads on a necklace. Reopen or create a small train station first and then develop around it. Quick mass rail transit is the sustainable choice for most cities and quickly developing areas around the world. It is predictable and reliable and can be scaled up by adding more trains. Avoid total dependence on the road system, be it car or bus, it has too many variables making it unpredictable and unsustainable long term due to congestion.</p>	
Estrans Ltd	<p>Estrans support the view expressed in the consultation that the Local Plan will prepare a new strategy to locate new development requirements within the District, rather than extending the life or re-working the existing strategy. It is also recognised that it is sensible to start by looking at how development can be accommodated in urban areas, but also recognised that the urban area around Bristol will not be the only solution.</p> <p>The extent of Green Belt across South Gloucestershire is significant and covers 40% of the District, including the most sustainable locations around the urban areas, the market towns and the most accessible rural settlements which are in relative proximity to those Centres, such as Westerleigh which is only a short distance from Yate and the North Fringe to the South.</p> <p>It will be a matter for the Local Authority to consider whether exceptional circumstances exist to review and amend the Green Belt boundary to enable the</p>	04 May 2021

Respondent Name	User Response: Text	Response Created
	<p>delivery of a sustainable Spatial Strategy. Estrans support that there are exceptional circumstances to do so. The proposed site in Westerleigh provides a logical location for a small adjustment to the settlement boundary, which is inset within the Green Belt, to enable proportionate growth for the foreseeable future.</p> <p>Estrans broadly support the approach to the Building Blocks being considered. As set out above, the scale of the development requirements across the sub-region will need a blend of approach. Not least to aid delivery. The delivery of some development around rural settlements (Building Block 4), such as Westerleigh, is appropriate in comprising part of the strategy.</p>	
F. Francis	<p>See attached representations.</p> <p>Development Strategy (Questions 6, 7 & 8):</p> <p>As previously mentioned in this letter, our client is supportive of the urban living approach more generally and considers that efficient use should be made of all previously developed land in these areas (Building Block 1: Existing Urban Areas). The risks of over-allocating development on this type of land have been considered earlier in this letter, and thus, it has also been identified that a mix of greenfield sites should be selected as part of the Council’s spatial development strategy.</p> <p>As such, the allocation of sustainable housing sites on the edge of urban settlements close to existing infrastructure is wholly supported (Building Block 2: expanding our main urban areas through small or large urban extensions). This would generally result in the loss of Green Belt land as most of the urban areas at the North and Eastern Fringes of Bristol within the South Gloucestershire boundary are tightly constrained by Green Belt policy. Issue no. 44 (Green Belt) identifies that over 40% of South Gloucestershire is currently covered by Green Belt protection. Many of the surrounding sustainable villages, including Winterbourne, are awash with Green Belt limiting the settlement’s planned growth. It is necessary for a robust Spatial Strategy and housing delivery efficiency to deliver housing at both urban and sustainable rural locations. Rural Settlements have a key role to play in delivering a sustainable Spatial Strategy (Building Block 4: Rural Villages and settlements), they should be investigated for their potential to provide a mix of small, medium or large scale growth depending on the supporting infrastructure and wider settlement sustainability principles. The Local Plan 2020 Phase 1 Sustainability Appraisal (SA) (Page 67) recognises that Winterbourne’s access to facilities and amenities and its location on the urban fringe of Bristol supports means that directing further housing here can assist with Climate Change mitigation. It states:</p> <p>“Option 2 directs small to medium-scale growth to locations within as well as outside the Green Belt and therefore includes a wider range of villages and settlements across South Gloucestershire. However, as with Option 1, there is also offers varying levels of access to key services/facilities. Significant positive effects are identified for this approach in relation to SA objective 1a: Climate Change mitigation and the access related objectives (SA objectives 2d and 3c/3d/3e).”</p> <p>“By including some small scale development at sites within the Green Belt close to</p>	26 Apr 2021

Respondent Name	User Response: Text	Response Created
	<p>the urban area of the District, a proportion of new residents could have particularly good access to the wider range of services and facilities at these locations. This would potentially strengthen the positive effects recorded. Furthermore, development within the Green Belt could allow for new residents to benefit from infrastructure improvements or new services where these settlements are close enough together to support a relatively high level of development overall to allow for new provisions. This could be the case at settlements such as Winterbourne, Frampton Cotterell and Coalpit Heath given their close proximity.”</p> <p>The Local Plan 2020 Phase 1 Issues and Approaches document states:</p> <p>“The Public Transport journey times, particularly in locations around Market Towns and the edge of the urban area are often relatively quick and connect to a wider range of destinations. These include: Winterbourne.”</p> <p>“Settlements such as Winterbourne are on Public Transport corridors that connect Yate/Chipping Sodbury and the North/East Fringe of Bristol.”</p>	
Fiona Milden - Vistry Homes Limited	<p>Vistry Homes supports the aims of the growth strategy to be delivered through the Local Plan.</p> <p>We support the Plan’s aim to optimise the density and efficiency of land within the existing urban areas, particularly Bristol North Fringe, however, we agree that Building Block 1 will be unable to deliver sufficient growth to meet the housing and employment needs over the Plan Period and therefore other building blocks will be required.</p> <p>Furthermore, Bristol City Council, which had already been unable to accommodate its housing requirement within its boundaries, is now faced with delivering an uplift in housing provision of 35% in response to recent amendments to the Standard Methodology. Vistry Homes understands that South Gloucestershire Council will work with Bristol City Council to assist in the delivery of housing to meet its needs beyond the City boundaries. This will place further pressure on South Gloucestershire to identify substantial areas of land for residential development. Whilst opportunities presented for intensification of existing urban areas are to be encouraged, these will be limited and insufficient to meet the increasing need for new housing in this area.</p> <p>In this regard, we strongly support the development opportunities available through Building Block 2, namely to expand into locations beyond the existing North and East Bristol Fringe, including land within the Green Belt.</p> <p>As identified through the Sustainability Appraisal (November 2020) these areas face a current imbalance between jobs and resident workers leading to high levels of traffic and long commuting distances.</p> <p>The delivery of additional new homes within an expanded Bristol North Fringe, closely-associated with the established employment areas, offers a genuine opportunity to readdress this imbalance, shorten commuter trips, enable more trips by foot and cycle and increase patronage of Public Transport services.</p>	09 Mar 2021

Respondent Name	User Response: Text	Response Created
	<p>Locating development close to the existing Bristol urban area would also provide homes in areas experiencing the highest levels of housing need and would therefore make the most significant contribution towards addressing the Affordable Housing supply.</p> <p>Whilst it is acknowledged that the expansion of these communities would result in the removal of some land from the Green Belt, any harm associated with the loss of Green Belt would be significantly outweighed by the locational advantages of such sites and the contribution their development could make towards a Carbon neutral economy, by delivering new homes in close proximity to established major employment, education facilities, retail, community and transport infrastructure.</p> <p>The role of Building Blocks 3, 4 and 5 will be determined in part by the housing and employment requirements established through the SDS. Vistry Homes recommends that housing growth is prioritised at the Bristol urban fringes and other locations which are well-related to Bristol and which can, individually and collectively, support the delivery of mass transport infrastructure, reduce the need to travel and create viable developments in pursuit of a Carbon neutral economy.</p>	
Gareth Fielding	Must be urban.	28 Feb 2021
Gareth Jackson - Alder King	We agree that the likelihood of meeting all of the needs for new homes and jobs in the urban areas, with Building block 1, is low and that other areas of South Gloucestershire may also benefit from growth to improve or maintain their longer-term sustainability as mixed and balanced communities and provide a choice of new homes, including affordable ones.	19 Mar 2021
Hannah Saunders - Dodington Parish Council	<p>Page 60 – STRATEGY:</p> <ul style="list-style-type: none"> • ‘Potential Urban Lifestyle Locations’ the Yate area forms one of these – and Members will repeat what they have said before – when talking about optimising density SGC need to make clear that this isn’t about increasing density.... 	25 May 2021
Hannick Homes	<p>The five building blocks should not be seen as some form of sequential assessment. The most sustainable locations and sites for additional residential development should be identified.</p> <p>In that context, Hannick Homes controls land at Windmill Farm, Sodbury Road, Wickwar which they consider eminently suitable for residential development. The site has been put forward in the Council’s Call for Sites (site ref: SG036) and concluded that it was available, suitable and developable for a residential development of approximately 45 dwellings (see Plan).</p>	25 Mar 2021
Heather Elgar - Woodland Trust	With regards to any intensification approach, we support the renewal first of brownfield sites, but it is crucial: a) to review the ecological value of sites first – as brownfield sites can have high ecological value; b) to ensure that all residents have good access to high quality natural green spaces; and c) to ensure that green infrastructure is embedded in all new schemes.	12 Feb 2021
Helen Johnstone	No comments	26 Feb

Respondent Name	User Response: Text	Response Created
- Stroud District Council		2021
Hilary Bridgewater	Leave market towns alone	22 Feb 2021
Ian Leslie	I do not believe that developing satellite residences and covering the rural land with concrete does anything to achieve your aims of protecting health and well being, not only of the humans living here but also the wildlife to which this document pays little but lip service. If greater income for the Council is the goal then all the other aims concerning health, preservation of wildlife and correcting climate change that the Council profess to follow are just ridden over.	28 Feb 2021
IM Land	<p>25. The 5 categories identify all the different spatial approaches for accommodating development. As such they represent a consistent approach with National Planning Policy. However, there is concern that categories 1 - 5 could be mis-interpreted as some form of sequential approach. This should be clarified given the character and disposition of settlements in South Gloucestershire will not always mean urban living will be the most sustainable form of development or that it will represent the best response to Climate Change when travel patterns are fully considered. Further consideration should be given to new community proposals that are sustainably located to meet a number of National and Regional objectives.</p> <p>26. It is inevitable that a proportion of residents from across South Gloucestershire will travel to a range of destinations within Greater Bristol and, as such, places like Thornbury and Yate, which form part of the Potential Urban Lifestyle locations will generate longer car borne trips than other settlements close to Bristol. Evidence from 'Data Shine Commute' for the larger settlements demonstrates the very significant proportion of out commuting to Greater Bristol for employment purposes from all the settlements across South Gloucestershire (Appendix 3 provides illustrated examples). The Plan, therefore, needs to recognise the influence of Bristol as a major employment hub on travel patterns and consequentially on Carbon emissions and Climate Change. IM Land suggest that SGC should place greater weight on travel data to inform the location of new development, to reduce journey trips and Carbon emissions, rather than simply seeking to balance housing and employment as this is not a practical solution. Development at settlements around the Bristol Fringe, like Pucklechurch, which have been overlooked for development due to Green Belt, would have a material and positive effect on Climate Change. They would do this by reducing commuting distances across South Gloucestershire by enabling low Carbon travel and shorter trips.</p> <p>27. It is also noted that the Potential Urban Lifestyle locations are existing urban areas and whilst sites like Filton Airfield may yield greater development potential through higher densities, places like Yate, Thornbury and the East Fringe locations have grown through greenfield urban extensions. The ability for these places to intensify is therefore likely to have been largely exhausted and should not be overestimated at the expense of delivering much needed homes in the right locations to address Climate Change. It should also be noted that the Urban Lifestyle approach will compete with retaining employment land, thus applying pressure to release it for housing. This is something that the emerging Plan should be mindful of to ensure balanced growth.</p>	11 May 2021

Respondent Name	User Response: Text	Response Created
	<p>28. Regarding Buildings Blocks 2, 3 and 4, a one size fits all approach is not going to deliver sustainable development or indeed, address Climate Change. Whilst the North East Fringe (Building Block 2) is a logical location to support reduced commuting into Bristol, there has been continual and rapid expansion over recent years. There are equally sustainable locations for planned new growth nearby such as Pucklechurch.</p> <p>29. In our view, Building Block 3 has limitations regarding sustainable development. Whilst settlements like Thornbury, Chipping Sodbury and Yate all have a range of local services and facilities and could support indigenous growth, a Plan which addresses the Council's declared Climate Change Emergency will need to provide homes closest to where jobs are. The Plan must recognise the influence that Bristol has in this regard. The Datashine information in Appendix 3 also suggests that due to the spread of employment destinations across Greater Bristol, a reliance on rail connections to improve the sustainability of commuting will only account for a very small proportion of travel from these settlements. As such, the approach to spatial planning should focus on shorter journey-to-work distances and encourage more flexible, Carbon efficient travel modes. This type of strategy will rely upon using the strong network of dedicated cycle routes like those which link with places like Pucklechurch to avoid wherever possible, the Carbon impact of major new engineering infrastructure.</p> <p>30. IM Land is concerned that Building Block 4 is largely overlooked as a sustainable means of addressing larger-scale development especially where this would improve the Council's response to Climate Change. Depending upon their location, larger-scale growth at some 'rural villages' will perform better than Market Towns when travel patterns are accounted for and when development is of a scale to bring new services and facilities with it to support and enhance existing walkable neighbourhoods. SGC is urged to re-look at this during the early stages of Plan preparation and specifically the impacts of reducing commuting distances and changing travel modes on the Climate Change Emergency. Moreover, a substantial response to the Climate Change Emergency in our view represents an exceptional circumstance to review Green Belt boundaries at those sustainable settlements like Pucklechurch.</p> <p>31. Building Block 5 (free standing new settlement) is a more complex proposition in terms of addressing Climate Change and sustainability than larger-scale growth at some 'Rural Villages.' This is because it relies upon building sustainability from scratch and brings with it the Carbon impact of additional infrastructure. In the JSP, land at Buckover was identified as a potential new settlement and whilst the Hearings did not take place, there was widespread concern about the deliverability, sustainability and viability of this draft allocation. Places like Pucklechurch West can deliver high-quality and sustainable development whilst being much closer to Bristol's employment base. That proximity enables cycling and e-cycling to be utilised to access major employment areas on dedicated cycle routes into and around Greater Bristol. The proximity of Pucklechurch to Greater Bristol will demonstrably reduce commuting distances and thus greatly support the response to Climate Change. Similarly, utilising Building Block 4 also enables existing services</p>	

Respondent Name	User Response: Text	Response Created
	<p>and facilities at settlements to be upgraded for the benefit of all users in the short-term to underpin the sustainability of growth and in return growth will provide further new services and facilities through mixed-use development.</p> <p>32. In summary, given the spatial structure of South Gloucestershire, including the location of the Market Towns to the North and, the influence on employment commuting patterns of Greater Bristol to the South, more emphasis should be placed on exploring Building Block 4 to deliver a greater proportion of future growth.</p>	
IM Land Limited	<p>Please see enclosed submission.</p> <p>5.1 Within the scope of these representations, we broadly support the Council’s identification of the five Building Blocks. Whilst site selection and the portfolio of allocations proposed will be key to ensuring the soundness of the Plan, we consider that a blended approach incorporating all Building Blocks should be pursued.</p> <p>Building Block 1: existing urban areas:</p> <p>5.3 As previously set out, whilst our client recognises that National Planning Policy prioritises optimising urban areas, in the context of South Gloucestershire, there are real concerns that an over-reliance on Urban Lifestyle Locations will have a number of unintended consequences and not deliver sustainable development. Please refer to Paragraphs 3.4 and 3.5 above.</p> <p>Building Block 2: expanding our main urban areas through small or large urban extensions:</p> <p>5.4 This building block would see expansion into locations beyond the communities of the North and East Fringe, to meet the needs for new homes and jobs. In most cases, it would require development of land currently in the Green Belt. Our client fully supports the progression of this Building Block in delivering sustainable development.</p> <p>Building Block 4: rural villages and settlements:</p> <p>5.6 This Building Block would investigate large, small or medium scale growth around rural villages. Our client supports the growth of rural villages to ensure the vibrancy of existing services and facilities, to support the delivery of new community infrastructure and to avoid localised housing land supply issues and associated affordability impacts.</p> <p>Building Block 5: New Settlements:</p> <p>5.11 New settlements can provide the Council with consistency of supply which stretches beyond the Plan period. However, they have significantly longer lead-in times; for example, the timescale for new settlements obtaining Planning Permission is double that of sites between 100 – 500 homes [2]. A new settlement proposal will moreover have greater infrastructure requirements and will unlikely be capable of meeting the Plan’s early needs for the delivery of housing.</p>	26 Mar 2021

Respondent Name	User Response: Text	Response Created
	<p>[2] Start to Finish, Lichfields, 2016.</p> <p>5.12 Our considerations in respect of a potential new settlement will relate to the detail of any site selected and we therefore reserve the right to comment further on this as the preparation of the Plan progresses.</p>	
Ivywell Capital (IC)	<ul style="list-style-type: none"> • Given the importance of the Bristol Urban Fringe and Yate as key service and employment centres, the most sustainable spatial distribution option will be one which directs the majority of development to these areas. This includes development at the rural villages well related to these areas and along key transit routes. • This, coupled with the acuteness of the housing requirement, will likely necessitate the release of land from the Green Belt given that this wraps around the urban fringes of Bristol and Southern and Western edges of Yate. Exceptional circumstances are expected to be demonstrated on the basis that this will be required to achieve a sufficiently sustainable pattern of development. • Whilst we would expect a significant proportion of development to be accommodated on large strategic sites, there are inherent risks and drawbacks with this approach that need to be addressed. Significant infrastructure costs, long-lead in times and viability issues can lead to significant delays in sites coming forward, or potential benefits reduced (e.g. lower affordable housing contributions/provisions). • On large strategic sites the supply of new dwellings is also controlled to maximise selling prices which slows delivery of new homes including affordable homes. • The reduced Plan period (15 years) compared with the JSP (20 years) also means that realistic assumptions about the delivery trajectories need to be identified to ensure sufficient housing will be delivered over the Plan period. • It is imperative that the Council has confidence that any SDLs that are identified can be delivered and make a meaningful contribution to housing delivery, especially given the compressed Plan period. A failure to deliver housing in a timely manner will lead to a deficient housing land supply position, constrict economic growth and exacerbate affordability issues (inter alia). • These risks can be mitigated to some degree through the identification of non-strategic levels of growth which can come forward promptly to underpin delivery in the early years of the Plan period whilst also delivering policy compliant levels of affordable housing. • A balance will need to be struck in terms of the distribution between the two sources in order to ensure sufficiently sustainable patterns of development are achieved without jeopardising housing delivery; however, there is a clear imperative to direct growth toward the rural villages in the Green Belt and this is supported by the interim Sustainability Appraisal. 	17 May 2021

Respondent Name	User Response: Text	Response Created
	<p>4.1 The building blocks identified broadly form the principal locations that one would expect to see a Local Plan utilise to deliver the development needs of the District. Typically, it will be a combination of most, if not all of these, that would help to secure the development needs of a District and achieve an appropriate balance between sustainability and deliverability.</p> <p>4.2 Urban Areas, which are generally home to a good level of existing services, facilities, employment opportunities and Public Transport connections, are considered to be among the most sustainable locations for development. As such, we are supportive of development within these areas which will, generally, be the most sustainable locations for new development.</p> <p>4.3 The difficulty is in anticipating a realistic quantum of development that will come forward from this source. We will comment further on any anticipated delivery from this source once this is more clearly defined in future consultations.</p> <p>4.4 Regardless, it is rightly acknowledged within the Phase 1 document and Sustainability Appraisal (SA) that this source will not be able to meet the development needs of the District on its own and other 'building blocks' will need to be utilised within the spatial distribution strategy.</p> <p>4.5 Urban Extensions are supported on the basis that the communities of the North and East Fringes already benefit from strong levels of employment, services, facilities and Public Transport connectivity and, therefore, there is good potential for development in these locations to achieve high standards of sustainability.</p> <p>4.6 The Bristol North Fringe in particular boasts a wide range of services, facilities and employment opportunities with excellent Public Transport connections between them. Its importance as an employment hub for South Gloucestershire is also highlighted on page 47 of the infographic with significant levels of in commuting to the area, relative to out commuting (which is generally toward Central Bristol).</p> <p>4.7 Given its importance and the limited scope for further growth within the confines of the M4/M5 boundary, careful consideration needs to be given in respect of how development can be sustainably delivered in order to take advantage of the service and employment provision within it. An appropriate level of growth at the villages around the Northern Fringe (e.g. Tockington and Olveston) would be well related to the Bristol Urban Fringe and could complement any strategic levels of growth which come forward elsewhere (e.g. along the A38 Corridor).</p> <p>4.8 For similar reasons, Market Towns are also generally considered to be sustainable locations for development, albeit their level of service and employment provision is below that of the Bristol Urban Fringes. The three Market Towns identified are Yate, Thornbury and Chipping Sodbury. Whilst we would generally support development at these locations, one needs to be mindful of both their capacity to expand further and the wider factors that influence sustainability at a macro level.</p>	

Respondent Name	User Response: Text	Response Created
	<p>4.9 The Rural Villages building block includes a number of settlements of varying size, significance and unique circumstances that will influence what level of development could come forward at them.</p> <p>4.10 It is imperative that an appropriate level of development can come forward at the rural villages in the interests of maintaining their vitality and viability. This is important to address affordability issues within rural areas, breathe new life into communities and support existing services and facilities.</p> <p>4.11 Villages such as Tockington and Olveston have a reasonable level of service provision within them, but have not been able to expand significantly in recent years as a result of the Green Belt constraints. This has exacerbated affordability issues within the village and put local services in danger of being lost (see above). Allocating a proportionate level of growth at villages such as these can help to support and enhance their vitality and viability and should be explored within the new Local Plan.</p> <p>4.12 New Settlements can also make a valuable contribution to housing supply where there has been a sound approach to securing their delivery in a timely manner. Excellent examples of this would include the delivery of Cranbrook in East Devon and Northstowe in South Cambridge.</p> <p>4.13 As acknowledged within the Consultation Document, careful consideration needs to be given to any identified opportunities. A significant level of reassurance will need to be provided that the needs of the new community will be met and that they will come forward in a reasonable timeframe.</p> <p>4.14 New physical infrastructure (generally transport related) is often required to facilitate their delivery. The cost of this can either be prohibitive, affect viability or require external funding sources to secure their delivery. The latter is often reliant on being obtained via specific bid cycles. This can, in turn, affect the timely delivery of such new settlements. This will need to be borne in mind, especially given the shorter Plan period compared with the JSP.</p> <p>4.15 It is also worth noting that viability considerations on strategic sites can adversely affect the delivery of other important benefits such as affordable housing. The East of Harry Stoke New Neighbourhood, for example, only considered capable of delivering around 25% affordable housing across the entire allocation without grant funding. This is significantly below the Core Strategy's overall affordable housing target of 35%. Non-strategic sites generally have the benefit of being able to deliver policy compliant levels of affordable housing (as a minimum).</p> <p>4.16 The quantum of affordable housing that can be secured on site should be a consideration for the Council when weighing up the merits of different locations for growth and in determining the split between strategic and non-strategic levels of growth.</p> <p>4.17 Once a set of sufficiently sustainable locations have been identified, deliverability should then be the key consideration in deciding which of these</p>	

Respondent Name	User Response: Text	Response Created
	<p>should be pursued. There are significant consequences associated with the failure of strategic sites to come forward (exacerbation of affordability issues, stymied economic growth, delays to key physical and social infrastructure etc). This is something that the Council should actively look to avoid.</p>	
<p>Jack Turner - Patchway Town Council</p>	<p>No.</p>	<p>17 Feb 2021</p>
<p>James Carpenter - Falfield Parish Council</p>	<p>Question 6:</p> <p>There seems to be a history of poorly designed developments where Farmers have wanted to sell off land for development, again as mentioned before these poorly designed development (for example Falfield Grange to the North of Falfield village) has no extra facilities, no shops, Doctors, Dentist, also all have to commute to the nearest town for these facilities.</p> <p>Also, the trend for new housing developments have very small gardens for young families and their children to play safely. Or even grow some vegetables.</p> <p>There is a mention that there should be building more multi-storey apartments for Senior Citizens, but why should Senior Citizens be deprived of a garden of their own?</p> <p>There is a mention of building flats above shops, so that the area has a multiuse, shopping or offices in the day and then in the evening folk would use the same footfall in the evening which would count as multiuse. But what kind of activities would there be available for evening use if the area has shops and offices in the day..... are the people to be regarded as the 'twilight zone' people who only come out after 6pm? But what about the Winter when it gets dark at 4pm?</p> <p>Ensure we protect sense of place.</p> <p>Previous Call for Sites and JSP strategic sites completely failed to respect existing residents and the character of rural locations with large scale house dumping described as a Strategic Development Location. A rural location must be respected as rural and not the target of large-scale urbanisation under the disguise of a Plan. New settlements MUST be stand alone and well away from existing settlements. The rights of existing residents especially in small hamlets MUST be considered in any New large-scale development to prevent the Urbanisation of very rural areas. Large scale new settlements are very risky and will need massive investment in new infrastructure. Sufficient provision must be made to hold both developers and the Council accountable for the delivery of ALL infrastructure and promises for affordable housing/Schools/health services/transport network. It is not acceptable to dump houses without supporting existing residents in those locations and providing equivalency in the services offered such as drainage, sewage, access to utilities etc.</p> <p>Question 7:</p> <p>Strategy to conform with WECA SDS, but this is not available yet, so this</p>	<p>14 Apr 2021</p>

Respondent Name	User Response: Text	Response Created
	<p>consultation is premature, and we cannot agree.</p> <p>Ensure we protect sense of place. Previous Call for Sites and JSP strategic sites completely failed to respect existing residents and the character of rural locations with large scale house dumping described as a Strategic Development Location. A rural location must be respected as rural and not the target of large-scale urbanisation under the disguise of a Plan.</p> <p>Learn from previous mistakes. JSP locations were not considered strategic. Reconsider all previous site selections.</p> <p>New places to have a balance of homes and jobs. Individuals jobs and skills vary so much, and family members rarely work in the same trade. Even City Centres cannot cater for all job types, resulting in commuting between settlements, so it is wishful thinking that a small village might be able to provide suitable jobs for the majority of its residents.</p> <p>We query the prominence of the railway line from Yate to Tytherington on the diagrams. Public trains do not operate on this route, it is a line to the quarry. Including it is misleading, it implies a Public Transport route which is not there.</p> <p>Agree with Building blocks 1 to 4. But do not agree with building block 5 as a strong enough case for it has not been tabled. New standalone settlements may not be required. The existing settlements, whether in or out of Green Belt, should be studied first before the 'New settlement' building block 5 is tabled as an option for consideration. New settlements mean that the majority of investment is solely directed to new residents and not to improving connectivity and infrastructure for existing communities. There are already 59 settlements in South Gloucestershire according to the diagrams, why add more when the existing ones can be 'revitalised?'</p> <p>If new settlements will be considered they must be stand alone and well away from existing settlements and groupings of houses. The rights of existing residents especially in small hamlets must be considered in any new large-scale development to prevent the urbanisation of previously very rural areas.</p> <p>Large scale new settlements are very risky and will need massive investment in new infrastructure. Sufficient provision must be made to hold both developers and the Council accountable for the delivery of all infrastructure and promises for affordable housing/Schools/health services/transport network. It is not acceptable to dump houses without studying in depth the impact on existing residents and businesses in those areas, supporting existing residents in those locations and providing equivalency in the services offered such as drainage, sewage, access to utilities etc.</p>	
James Durant - Cotswold Homes	Cotswold Homes are fully supportive of the proposed building blocks and recognise that a combination of these building blocks will be required to create a Spatial Strategy which fully meets the housing needs of the region across the Plan period in the most sustainable way.	19 Apr 2021

Respondent Name	User Response: Text	Response Created
	<p>With regards to the building block referred to as Urban Areas, we are fully supportive of this approach within urban areas and would re-iterate our previous comments regarding our desire to secure future Brownfield redevelopment opportunities across the region having demonstrated an excellent track record for delivering high quality schemes on such sites in recent years across the wider South Western region, including our scheme on the former Mangotsfield Primary School in South Gloucestershire. We would however emphasise our earlier comments in relation to the number of homes that the Council seek to rely on being brought forward through this building block. An unrealistic expectation on the number of homes which could come forward on urban sites (for the reasons set out previously but not repeated here) will only result in issues regarding delivery and the reverting back to speculative delivery of housing across the Plan period to resolve under delivery from urban areas. The over reliance on the Urban Areas building block should not be used as a tool for avoiding and reducing the more difficult discussions and decisions regarding the locations of greenfield allocations.</p> <p>It was evident that the West of England Joint Spatial Plan (JSP) was found to be critically flawed by the Inspectors examining it, in the main due to the fact that there was no underpinning Spatial Strategy with which sites were both selected and also assessed against one another in the context of.</p> <p>Inspector Malcolm Rivett gave further comments on this at the Examination and having listened back to the recordings of the Examination, those comments from 9th July were as follows:</p> <p>“Many Local Plans will say well our Spatial Strategy is to put 50% of the new housing growth at and around our main settlement, we’ll put 10% at each of the next four settlements in the sustainability hierarchy and we’ll put 10% around the rest of the area. And then when you come to consider individual sites for development, you go well here’s our main settlement, we need 50% here.... these are our candidate sites, there are three candidate sites which all are reasonable alternatives, we only actually need two of them so we’ve got to decide.... which two of those three are the best.... and at that point you might start saying, this one is close to the town centre, this one doesn’t have the transport infrastructure implications, this one would be slightly less impact on landscape and you do all those.... but what you’re not doing at that point is considering the 953 other sites for development in the rest of the District because they don’t meet that aim and that’s what we feel is missing here.”</p> <p>In this context it is pleasing to read that the Council are putting a heavy emphasis on sustainability in the Issues and Approaches consultation document and considering the opportunities for focussing development on the basis of a Spatial Strategy which revolves around a sustainability hierarchy of settlements and locations. As a SME housebuilder Cotswold Homes are fully supportive of further small to medium scale development at the Rural Villages and have a proven track record of producing high quality schemes, quickly at such locations; this includes our recent schemes at Tytherington, Chipping Sodbury and Rangeworthy. We would be keen to work with the Council to deliver further sites and would politely ask for the sites we have put forward to be seriously considered. We would also be</p>	

Respondent Name	User Response: Text	Response Created
	<p>keen to engage positively about potential locations for future growth through which we can focus our attentions when looking for new opportunities.</p> <p>As alluded to in an earlier question response, whilst SME housebuilders are more vulnerable to the risks associated with speculative development, historically it has been the approach of many Local Authorities to only or predominantly only allocate development on the large scale sites which SME housebuilders are not part of due to the lack of the ability to compete with the PLC housebuilders in terms of securing those sites but also not able to deliver on their own due to the resources available to us in delivery of such infrastructure hungry sites. We would therefore urge the Council to support local SME housebuilders such as Cotswold Homes by giving us the certainty of allocations on sites. In this context we of course fully support the rural villages building block and would ask that the Council moves away from relying on windfalls which offer no certainty and instead seek to allocate sites and or specify a number of homes which should be delivered at the rural villages.</p> <p>The Market Towns are of course some of the most sustainable locations outside of the identified Urban Areas of the previous Plan. As set out in our recent Call for Sites submission and as we have sought to demonstrate through the covering letter submitted with this questionnaire, Cotswold Homes have large land interests on the edge of Thornbury. As demonstrated in the Data and Access Profiles published as part of the evidence base to this consultation, Thornbury is a highly sustainable location and is able to be expanded without encroaching on Green Belt land.</p> <p>Whilst in principle terms New Settlements can be a useful tool in certain circumstances to sustainably meet housing targets, we do not consider that the Buckover Garden Village proposals which formed part of the JSP accords with the general issues and priorities highlighted in the consultation document. Due to the speculative nature that Thornbury has grown over recent years, as recognised by the consultation document this has led to a lack of infrastructure being delivered alongside the housing due to the lack of a joined up Plan led strategy which would have been able to identify and deliver the infrastructure and funding for it. Focussing new housing at Thornbury now in a Plan led way can ensure that the North East of the town is made more sustainable through the provision of infrastructure (local centre, community buildings, play areas etc) where such infrastructure is currently lacking. Focussing development at Thornbury itself rather than a divorced extension at Buckover will also help to ensure that existing facilities and services remain viable through sustained populations and also can help to make new or improved Public Transport options viable.</p>	
Jenny Raggett - Transport for New Homes	<p>Once again we re-iterate the importance of transit-orientated development as an important guiding principle as to where to build. New railway stations, opportunities to extend mass transit and so on are so important that you can't pre-judge by using these building block categories.</p> <p>An analysis of why existing large estates at Bradely Stoke, Yate etc. are so car-based and how to avoid this in the future would be useful.</p> <p>New government guidance in the form of the revised NPPF, and a National Design</p>	01 Mar 2021

Respondent Name	User Response: Text	Response Created
	Code and a mandate for walkable streets with trees, mean that the domination of places by parking and tarmac, is all part of a move away from the places we have been building. It is important to make sure also that major destinations such as Universities, colleges, health care, and employment are connected to a new modern mass transit network with integration with much improved local rail. It is important that the Planning Inspectorate, when they come to examine the South Gloucestershire Local Plan, understand how good policies on sustainable transport need to be underpinned by an area- wide aspirational European-style public transport integrated network linked the Greater Bristol Area. Transport planners need to work closely with spatial planners to specify a solution in the Plan.	
John Acton	I broadly agree with the categorisation of the five blocks. However, the indication that large scale new settlements might be considered in the Green Belt is wrong and should be deleted.	26 Mar 2021
John Brimacombe	Future developments should ensure existing communities and their characters are maintained.	28 Feb 2021
John Calver	I'm in favour of all other than New Settlements . Almost by their very nature they aren't sustainable	04 Feb 2021
John Mills - Cotswolds Conservation Board	<p>Building Block 1 (Existing urban areas)</p> <p>Building Block 1 fits well with the Government’s proposed ‘cities and urban centre uplift’, which focuses on the top 20 largest cities and urban centres in England, including Bristol.</p> <p>The Government has identified three key reasons for following this ‘uplift’ approach:</p> <ol style="list-style-type: none"> 1. Building in existing cities and urban centres ensures that new homes can maximise existing infrastructure such as public transport, medical facilities and shops. 2. There is potentially a profound structural change working through the retail and commercial sector, and we should expect more opportunities for creative use of land in urban areas to emerge. Utilising this land allows us to give priority to the development of brownfield land and thereby protect our green spaces. 3. Our climate aspirations demand that we aim for a spatial pattern of development that reduces the need for unnecessary high-carbon travel. <p>The Government has indicated that this ‘uplift’ is expected to be met by the cities and urban centres themselves, rather than the surrounding areas. However, the three key reasons outlined above would also, arguably, apply to the ‘potential urban lifestyle locations’ identified in the draft Local Plan.</p> <p>Building Block 2 (expanding our main urban areas through small or large urban extensions).</p> <p>The explanatory text on page 64 of the consultation document states that ‘this</p>	16 Mar 2021

Respondent Name	User Response: Text	Response Created
	<p>building block would see expansion into locations beyond the communities of the North and East Fringe'. However, whilst the consultation document expands on the 'urban lifestyles' approach of 'Building Block 1' and 'sustainable rural villages and settlements' (Building Block 4), it provides very little supporting information on Building Block 2. This makes it difficult to provide informed comments on the implications of Building Block 2.</p> <p>It is worth noting that the urban area of the 'East Fringe', bounded on its eastern side by the A4175, comes within approximately 1.5km of the Cotswolds National Landscape boundary. Therefore, if eastward expansion beyond the A4175 is being considered, this should include an assessment of potential impacts on views from (and to) the Cotswolds National Landscape. This should include views from the Cotswold Way National Trail (for example, from the hill fort above North Stoke (GR: ST70716891) and from Hanging Hill (ST71257017)), from the Monarch's Way trail in the vicinity of Upton Cheyney and from the minor road between Upton Cheyney and Wick, which runs along the boundary of the National Landscape. It may also be appropriate to assess potential impacts on the tranquillity and dark skies of the Cotswolds National Landscape.</p> <p>Further information / guidance on development in the setting of the Cotswolds National Landscape is provided in our response to Question 16.</p> <p>Building Block 3 (Growth around our market towns)</p> <p>The Cotswolds Conservation Board's interest in 'Building Block 3' primarily relates to Chipping Sodbury. This is because of Chipping Sodbury's close proximity to the Cotswolds National Landscape (CNL). For example, the River Frome, which marks the eastern edge of Chipping Sodbury, is approximately 1.4km from the National Landscape boundary and approximately 1.9km from elevated viewpoints on the Cotswold Way National Trail on the Cotswold escarpment.</p> <p>As such, Chipping Sodbury is located within the setting of the Cotswolds National Landscape. Large scale, new development beyond the settlement boundary of Yate could also potentially be within the setting of the Cotswolds National Landscape, particularly any new development to the south of the train line on the southern boundary of Yate.</p> <p>Further information on development in the setting of the Cotswolds National Landscape is provided in our response to Question 16.</p> <p>With regards to potential visual impacts, key viewpoints to consider are outlined below.</p> <p>Views from the Cotswolds National Landscape</p> <p>Key viewpoints within the Cotswolds National Landscape looking towards Chipping Sodbury (and Yate) include views from:</p> <ul style="list-style-type: none"> • The Cotswold Way National Trail. 	

Respondent Name	User Response: Text	Response Created
	<ul style="list-style-type: none"> • The Cotswold Way Circular Walk 11. • Footpaths on Old Sodbury Hillfort scheduled monument (including the Cotswold Way), although those views might be blocked by the trees on the western boundary – would also need to consider impacts on the setting of this scheduled monument. • The grounds of the Grade II* listed building of the Parish Church of St John the Baptist (which the Cotswold Way passes through), which is marked as a viewpoint on Ordnance Survey maps – would also need to consider impacts on the setting of this listed building. • The access land on the Cotswold escarpment between Old Sodbury Hillfort and St John the Baptist church. • Important views identified in relevant Neighbourhood Development Plans. <p>Views towards the Cotswolds National Landscape</p> <p>Key viewpoints outside the Cotswolds National Landscape, looking towards it, would include views from:</p> <ul style="list-style-type: none"> • Named footpaths, including Monarch’s Way, Frome Valley Walkway and Jubilee Way. • The access land / common land to the north east and south east of Chipping Sodbury. • Listed buildings – would also need to consider impacts on the settings of these listed buildings. • Important views identified in relevant Neighbourhood Development Plans. <p>BUILDING BLOCK 4 (rural villages and settlements)</p> <p>The consultation document identifies that 22% of South Gloucestershire lies within the Cotswolds National Landscape. In addition, a substantial area would be located within the setting of the Cotswolds National Landscape, visible from the Cotswold escarpment and High Wold Dip Slope (Landscape Character Types 2 and 9, respectively, in the Cotswolds AONB Landscape Character Assessment).</p> <p>We recognise that the Cotswolds National Landscape is a living and working landscape in which the social and economic well-being of local communities are important considerations. Maintaining vibrant and thriving local communities is essential to the long-term future of the National Landscape. As such, the National Landscape cannot be considered exempt from the need for new housing and other development. Indeed, the right development in the right place can potentially play a positive role in helping to conserve and enhance the natural beauty of the National Landscape.</p>	

Respondent Name	User Response: Text	Response Created
	<p>However, development within the Cotswolds National Landscape and its setting should be delivered in a way that is compatible with – and positively contributes to – the statutory purpose of conserving and enhancing the natural beauty of the area. To not do so would undermine:</p> <ul style="list-style-type: none"> • the statutory purpose of designation; • the principle that safeguarding AONBs is in the national interest; • the aspirations and goals of the Government’s 25 Year Environment Plan; • the proposals of the Government-commissioned Landscapes Review; • the vision, outcomes, ambitions and policies of the Cotswolds AONB Management Plan; • the Government’s assertions that: <ul style="list-style-type: none"> - meeting housing need is never a reason to cause unacceptable harm to protected landscapes; - protected land will be just that – our Areas of Outstanding Natural Beauty will be protected as the places, views and landscapes we cherish most and passed on to the next generation. <p>National planning policy and guidance helps to address this issue by making it clear that:</p> <ul style="list-style-type: none"> • the scale and extent of development in Areas of Outstanding Natural Beauty (AONBs) should be limited; • there is a presumption that planning permission should be refused for major development in AONBs; • policies for protecting AONBs may mean that it is not possible to meet objectively assessed needs for housing and other development in full; • AONBs are unlikely to be suitable areas for accommodating unmet needs arising from adjoining, non-designated, areas. <p>Further comments on potential development in the Cotswolds National Landscape and its setting are provided in relation to Building Block 3, above, and in response to Questions 14 and 15 below. Please also refer to our response to Questions 5, 15 and 15, in particular.</p> <p>BUILDING BLOCK 5 (large scale free standing new settlements) Large scale free-standing settlements would not be appropriate in the Cotswolds National Landscape. Such settlements would not be compatible with the</p>	

Respondent Name	User Response: Text	Response Created
	<p>requirement, in paragraph 172 of the NPPF, for the scale and extent of development in protected landscapes to be limited.</p> <p>Such settlements are also likely to be inappropriate in the setting of the Cotswolds National Landscape, particularly in close proximity to the boundary of the National Landscape. This is because of the potential impacts of such settlements on views from and to the Cotswolds National Landscape and because of potential impacts on the tranquillity and dark skies of the National Landscape.</p> <p>For large scale free standing new settlements these impacts could potentially be experienced many kilometres away.</p> <p>Further guidance on these issues is provided in the following Position Statements published by the Board:</p> <ul style="list-style-type: none"> • Development in the Setting of the Cotswolds AONB; • Tranquillity; • Dark Skies & Artificial Light. <p>Further information on development in the setting of the Cotswolds National Landscape is provided in our response to Question 16.</p>	
Jo Marsh	<p>As above green belt land needs to be protected wherever possible. New settlements and expansion of rural villages involves an increase in traffic, pollution and damage to the environment.</p>	11 Feb 2021
Jonathan Edwardes - Pilning and Severn Beach Parish Council	<p>Theoretically, if people can live within the built-up area and work within the same area then they can either walk to work or catch a bus/local train.</p> <p>Don't forget trains as there is a lot of / or potential usage around the Bristol conurbation.</p> <p>Where.? The council must optimise the use of the space that has been used before. In the 60s it was decided to build upwards, in sense of tower blocks, which are now not popular, but in planning/design we forget the space above commercial premises. Many existing ground floor commercial properties have residential opportunities upstairs. Often the inhibitor to making it work as residential property just requires a bit of thought / design. It may also require the council to look at how the property is rated/taxed to encourage the owner to bring the space into use. The council could use their own in-house expertise to tackle some of these redundant spaces.</p> <p>New commercial development could be designed with residential on upper floors, designed to modern space and access standards (see Tesco at W-s-M). The council could produce a design code along these lines and offer rating / tax breaks to encourage an enlightened approach.</p> <p>Each Parish could be asked to look at their 'Settlement Boundaries' against the question 'if you were asked to add 1% or 5% growth, where would you put it? You should not simply plan for growth based on what land a developer chooses to put</p>	26 Feb 2021

Respondent Name	User Response: Text	Response Created
	<p>forward. If you zone land for development, even if not offered under 'call for sites' then it will come forward.</p> <p>Yes, a review of the Green Belt is essential, but the value of the Green Belt must also be upheld and policies written to strengthen and enhance it.</p>	
Kate Kelliher	<p>Less homes will be needed, as so many migrant workers have returned home. They will find it more difficult to return now we are no longer in the EU. No homes to be built on green belt. More homes for retirees within their local area. Acknowledge that flats with a shared garden are not what retirees want, though this may sound very attractive to the young men and women in the planning department, who would love to aspire to such accommodation. Great for a first home, but not for a last home.</p>	31 Jan 2021
Kate Kelliher - Friends of Ram Hill Colliery	<p>It is important that, as a heritage open space, we blend in well with the new local area. We contribute so much to local people, particularly during the recent lockdowns. We need to be able to continue this contribution to the local area.</p>	06 Feb 2021
Kate Maskell	<p>See above Concerns about housing developments in Oldbury village and Kington hamlet</p> <p>Will reduce green space and damage the environment and eco system of the rural area</p>	22 Feb 2021
Katherine Buff	<p>Relates to pages 62 to 65: Growth within urban areas must do the heavy lifting for the authority's housing requirement, over and above existing permissions and the windfall allocation. This fits precisely with the momentous shift in external factors since the aborted JSP, namely:</p> <ul style="list-style-type: none"> • The legal requirement to meet the zero-carbon target by 2030 • The fact that the way people use our city centres has probably changed for good as a result of changes in shopping patterns, the impact having been significantly accelerated by the legacy of COVID-19 • The devastating impact on Govt finances which means that no reliance may be placed on any infrastructure project that does not have specific irrevocably committed funding • A realisation of the dangers of traffic pollution on public health which requires a major reduction in private car usage <p>This shift in priorities also accords with the Govt statement published on 16th December 2020 which states that "climate aspirations demand that we aim for a spatial pattern of development that reduces the need for unnecessary high carbon travel". Clearly any pattern of development other than growth within urban areas would represent up to 50,000 new jobs. The fact that large areas have been designate as suitable for employment also suggests that sufficient flood protection has already been put in place with good transport connectivity. If so, this area may merit further investigation for new settlements. precisely</p>	26 Feb 2021

Respondent Name	User Response: Text	Response Created
	<p>such unnecessary high carbon travel.</p> <p>The shift in emphasis to meet housing demand from within urban areas will not be possible to accomplish using the existing free-market model which is based around landowners clubbing together with developers to promote their own greenfield sites. The Local Authority will need to retain a hands-on role to ensure the implementation of appropriate high quality, high density housing on brownfield land.</p> <p>Building block 2, in the form of large urban extensions, has the major advantage that it benefits from easy connectivity to transport corridors and proximity to potential employment without the need for use of the private car, and therefore should reasonably be a priority within the mix. We note that the tables on pages 45 and 46 combine to show that since the inception of the Core Strategy there has been huge growth in employment development around the North Fringe of Bristol, and it would seem appropriate to make use of the review of the greenbelt to test the suitability of this land.</p> <p>Building block 3 – growth around our market towns – is unnecessary to meet the housing allocation and should be avoided for the reasons highlighted above. Due to the historic boundary of the greenbelt that forms a semi-circle around the town, we have been bombarded by speculative planning applications, in response to challenges to 5-year land supply issues. As a result, growth has been in the form of a distended urban sprawl away from the town centre. This has resulted in impaired services and facilities and severe impacts on inadequate infrastructure. Almost half of the approved development is still to be built out. These historic market towns are exactly that, they are not urban conurbations. Greenfield development around the periphery of these locations totally contradicts Priorities 1 and 2.</p> <p>Building block 4 – rural villages and settlements – should see only modest growth appropriate to the needs of the individual communities. For the most part this will come through “windfall developments” of less than 9 houses, and it is therefore unlikely to be necessary to include in the Local Plan.</p> <p>Building block 5 – large scale, free standing new settlements – This should be the absolute last resort in the event of being unable to find sufficient housing in the other four building blocks. In this event, any such proposals should be considered in the context of which locations would least infringe priority 1 (locations that pursue a carbon neutral future). Specifically, we are implacably opposed to any suggestion of the resurrection of a 3,000 unit (or more) car-based satellite development at Buckover.</p> <p>Furthermore, our view is that any large scale, free standing development should be just that – its boundaries proportionately spaced from the next settlement and able to be truly stand-alone immediately with all appropriate infrastructure in place, without any day to day reliance on any other settlement.</p>	

Respondent Name	User Response: Text	Response Created
	<p>However, we note that the table on page 45 shows the only area with significant land safeguarded for employment and not yet developed is in Severnside, which is also near the potential site for a Freeport, as proposed by WECA, with a claim that it may create up to 50,000 new jobs. The fact that large areas have been designate as suitable for employment also suggests that sufficient flood protection has already been put in place with good transport connectivity. If so, this area may merit further investigation for new settlements.</p>	
Katy Wiseman - National Trust	<p>Investigating the Green Belt</p> <p>Around 10% of National Trust land is within Green Belt designated land. The National Trust has a long history of promoting the importance of an effective planning system for conserving the nation’s environment, nature and heritage. We do sometimes seek planning consent for development on our land within the Green Belt but this is done carefully and selectively, where it furthers conservation and enjoyment objectives. For example, this might be for a visitor welcome building or car-parking facility. We are committed to only developing in the Green Belt in accordance with Green Belt policy, which allows for certain types of development, or where very special circumstances have been demonstrated, and our proposals go through the normal planning process.</p> <p>In respect of potential release of Green Belt for housing, such proposals should be evidence based and support housing which is sustainable, holistically planned, and where there is enough Green Belt retained to maintain the five purposes for the functioning of Green Belt as set out in the NPPF:</p> <ul style="list-style-type: none"> • to check that unrestricted sprawl of large built-up areas; • to prevent neighbouring towns merging into one another; • to assist in safeguarding the countryside from encroachment; • to preserve the setting and special character of historic towns; and • to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. <p>Green Belts around towns and cities are an important planning tool which prevents urban sprawl by keeping land permanently undeveloped. Development in the Green Belt must be carefully managed, and speculative housing development is not appropriate. Any changes to Green Belt boundaries must be fully evidenced and justified and formally decided through the Local Plan process and any development must be delivered in a sustainable and strategic way.</p>	05 Mar 2021

Respondent Name	User Response: Text	Response Created
Kevin Masters	I have read Trapp'd's response and wish to add my name to it.	25 Feb 2021
Kingdon	Development is not at the expense of quality of life and quality of the environment.	25 Feb 2021
Laurence Parsons	Building Block 4 - people choose to live in rural villages and settlements because that is their chosen lifestyle. While some small scale development is appropriate, and potentially medium scale, it is the threat of large scale development that has people worried. This type of overwhelming development goes against why we choose to live in small villages in the first place. The needs and desires of existing residents should be uppermost when choosing where to site new developments.	17 Dec 2020
Lauren Cook - Stride Treglown	<p>UWE Bristol agrees that the focus for development should first be the district's urban areas, identified as Building Block 1, where opportunities to make the most efficient use of land with an appropriate mix of uses and optimised densities should be a priority. The Bristol North Fringe, within which UWE is located, is recognised as a key contributor to this strategy. The 'potential urban lifestyle areas' map shown on Page 62 identifies UWE as a transport hub within the Bristol North Fringe and this designation is supported.</p> <p>The support offered by South Gloucestershire Council to the ambitions of a 'green economic recovery' to improve and benefit the local and regional economy is welcomed and closely aligns with UWE's goals as expressed within their Strategy 2030 document.</p> <p>Given UWE's location within an identified urban area, the university do not wish to comment in respect of building blocks 2-5.</p>	01 Mar 2021
Lee Preece	In rural villages and settlements, mention positive consideration for appropriate and low key development to encourage rural workers to build eco dwellings local to their places of work	03 Feb 2021
Lee Taylor	<p>I agree with all of them apart from rural villages and new settlements. The green belts and areas of natural beauty are the great draw of the south west we should not under any circumstance build on them ever! Once we start down that route there will soon be houses everywhere and no natural habitat to enjoy. Extending urban areas and existing towns must be the primary choice.</p> <p>Make sure your data is robust and system engineering is used to define requirements before you make decisions</p>	23 Jan 2021
Lee Williams - Cleve Rugby Football Club Ltd	<p>Please see attached document.</p> <p>3.41 As per potential priority 6 (Provide the right type and numbers of new homes), maximising or expanding the portfolio of sites, both in terms of size and locations, will reduce the reliance on large strategic sites, which are often dependent upon significant infrastructure. A wider range of site sizes can facilitate the early delivery of new homes, and in parallel, giving the time for larger scale strategic development locations to progress and begin to deliver later in the Plan period.</p> <p>4. Section 5: Strategy – Where will new development go?</p>	08 Apr 2021

Respondent Name	User Response: Text	Response Created
	<p>4.1 The context within which this section of the consultation document has been prepared is that the final growth figures will be determined through the WECA Spatial Development Strategy (SDS). Notwithstanding, the scale of growth needed to meet South Gloucestershire's need is known as this is calculated through the LHNA as being 1,412 new homes per year, as set out at Issue 27 of the consultation document.</p> <p>4.2 The Phase 1 consultation seeks to identify 'building blocks' and 'guiding principles' that are likely to shape the growth strategy of the new Local Plan. It is explained at page 61 of the consultation document that when developing the growth strategy the aim will be:</p> <p>? To meet agreed requirements for new homes and jobs with the objective to restore and enhance the natural environment at the heart of the approach.</p> <p>? To provide new homes and jobs that offer affordability and choice across a wide range of sites and locations throughout the District within essential infrastructure.</p> <p>? To improve the longer-term health, well-being and sustainability of the District's communities, balancing new homes and jobs, built around a high quality, natural and built environment and the opportunities for physical activity, including children's play, walking and cycling and access to formal and informal meeting spaces and green spaces.</p> <p>4.3 These overall aims of the growth strategy are supported as a matter of principle and the 'building blocks' identified to meet these aims are considered below.</p> <p>1: existing urban areas.</p> <p>4.4 This building block is focused on optimising the density and efficient use of land within existing settlement boundaries. As part of this strategy, the consultation document identifies the urban areas of the Bristol North and East Fringe, Yate and Thornbury.</p> <p>4.5 The emerging approach to planning for growth in the urban areas is set out within Section 6 of the consultation document ('Urban lifestyles'). The aim of the 'Urban lifestyles' approach is to make the best use of land in the most appropriate and sustainable urban locations, whilst providing high quality development that avoids negative impacts on people, character and assets in urban areas.</p> <p>4.6 The Phase 1 consultation document explains that there are five designated town centres within the East Fringe Area that are well placed to serve their communities.</p> <p>4.7 There is also an acknowledgement with the consultation document that these town centres and their High Streets are suffering because of changing shopping habitats and the gradual loss of their historic employment uses. As a consequence, regeneration and investment in some of the town centres is required.</p> <p>4.8 Through the new Local Plan, and specifically its focus on development through</p>	

Respondent Name	User Response: Text	Response Created
	<p>the ‘Urban lifestyles’ approach, the opportunity exists to bring forward a new planning regime that supports the regeneration, vitality and vibrancy of these urban areas. Such an approach for the town centres within the East Fringe is supported as a matter of principle.</p> <p>4.9 Accordingly, we support the approach to existing urban areas, as articulated through the ‘Urban Lifestyle’ strategy set out at Section 6, not least because it is consistent with national policy and has the potential to support the regeneration of town centres as part of the wider Covid-19 recovery strategy.</p> <p>4.10 Notwithstanding this, it is essential that any approach to the urban area balances the growth of new homes, with the provision of employment land in the urban areas. As noted within the consultation document (page 80), the steady loss of safeguarded and non-safeguarded employment land, mostly to housing in the East Fringe, leads to an imbalance of workers, resulting in longer commutes and less opportunities for walking and cycling.</p> <p>4.11 Ensuring that urban areas maintain a sufficient supply of employment land/sites should not be a secondary consideration in the growth strategy.</p> <p>2. Expanding our main urban areas through small or large urban extensions.</p> <p>4.12 This approach is focused on the expansion of the main urban areas, specifically the Bristol North and East Fringe and in doing so, the consultation document acknowledges that this will require the release of development sites from within the Green Belt.</p> <p>4.13 We generally support this approach as it provides opportunities to bring forward development at locations that have a good range of services and facilities as well as strong access/connectivity to such services by Public Transport.</p> <p>4.14 Our representations are submitted in the context of additional growth opportunities at the Bristol East Fringe, specifically on land controlled by Cleve Rugby Club (c 3.75ha) which is surplus to requirements, with the capacity to provide in the region of 100 - 120 dwellings (See Appendix 1).</p> <p>4.15 This land is promoted as a genuine development opportunity which reflects our comments that alongside the ‘Urban lifestyle’ approach, opportunities for the expansion/growth of urban areas should also include locations within the East Fringe area.</p> <p>4.16 The consultation documents considers that the A4174 Dual Carriageway marks the boundary for most of the East Fringe, it would therefore be a sensible approach to maximise development opportunities within the existing built-up area which is defined by the A4174 and this may include land at Cleve Rugby Club.</p> <p>4.17 The existing Green Belt boundary generally follows the route of the A4714, save for where it extends into the East Fringe area, in the general location of Pomphrey Hill/Mangotsfield. This extends across land controlled by the Cleve</p>	

Respondent Name	User Response: Text	Response Created
	<p>Rugby Club, going beyond to the route of Rodway Hill Road.</p> <p>4.18 The justification for the retention of this land as Green Belt within the A4174 which functions as the physical boundary of the East Fringe area, should be re-assessed through the new Local Plan process. This is considered necessary as the opportunity exists, as demonstrated by our representations, for additional sustainable growth to be delivered as part of the wider strategy for growth at the East Fringe area.</p> <p>4.19 Land controlled by the Rugby Club is located to the urban edge of Mangotsfield, and therefore functions as part of the East Fringe area. Mangotsfield has a wide range of local services, facilities and employment opportunities all within easy access by foot and cycle to the Rugby Club land. Therefore, it would be consistent with the proposals to ensure that new development is achieved on the basis of the principle of ‘walkable’ and ‘cycleable’ neighbourhoods.</p> <p>4.20 Moreover, the site is well served by health and education facilities, the latter including Mangotsfield (Secondary) School which is located c.350m from the centre of the site. The site is also well served by Public Transport corridors, as explained at paragraph 3.35.</p> <p>4.21 The site therefore benefits from good Public Transport services to local services and facilities, as well as large scale centres, such as Bristol City Centre, and given its location within the Bristol East Fringe, this would support the new Local Plan in terms of the approach of urban focus, particularly when this site is considered in the context the enclosure of the East Fringe by the A4174.</p> <p>3. Growth around out market towns.</p> <p>4.22 This approach is focused on the expansion at Yate, Chipping Sodbury and Thornbury and the corresponding need for land to be released from the Green Belt.</p> <p>4.23 There is no objection to growth at market towns as part of the wider strategy for achieving the scales of growth required to meet identified needs. However, we do consider that the sustainability of growth at these locations will depend upon what needs such growth is addressing. If an allowance for Bristol’s needs is re-directed to Market Towns in South Gloucestershire this should be based on an assessment as to whether such an approach will result in extended commuting patterns as new residents travel to and from Bristol to access services and facilities, as well as employment at Bristol.</p> <p>4. Rural villages and settlements.</p> <p>4.24 This approach is focused on those villages and settlements below the market town level, some of which are in the Green Belt and in many cases ‘washed over’ by the Green Belt. Other locations are also located in sensitive areas, such as the AONB.</p> <p>4.25 There is no objection to the proposed approach to rural villages and</p>	

Respondent Name	User Response: Text	Response Created
	<p>settlements as part of the wider strategy for achieving the scales of growth required to meet identified needs.</p> <p>4.26 If an allowance for Bristol's needs is re-directed to rural locations in South Gloucestershire, this should be based on an assessment as to whether such an approach will result in extended commuting patterns as new residents travel to and from Bristol to access services and facilities, as well as employment at Bristol.</p> <p>5. Large scale free standing settlements.</p> <p>4.27 This approach is focused on the opportunity to create a new settlement, requiring large greenfield areas at locations which may be within the Green Belt.</p> <p>4.28 Whilst new free-standing settlements are a legitimate planning option to provide for large levels of growth over the Plan period, these options are often complex in terms of delivery and can be dependent upon significant new infrastructure to sustain such levels of growth.</p> <p>4.29 Issue 32 (Issues with housing delivery of large scale sites) articulates the challenges that come with large scale sites and ensuring they deliver as projected. Such issues will undoubtedly be equally, if not more, applicable to the delivery of large-scale free standing settlements.</p> <p>4.30 Such options should not, in our view, be at the expense of the objective to broaden the portfolio of sites, both in terms of sizes and locations.</p> <p>5. Green Belt:</p> <p>5.1 A key influence on the final growth strategy for South Gloucestershire will be the approach to the Green Belt.</p> <p>5.2 As explained within the consultation document over 40% of South Gloucestershire is covered by Green Belt designations and within South Gloucestershire this separates Bristol and Bath and surrounds the North and East Fringe urban areas, running as far as Yate and Thornbury.</p> <p>5.3 The principal purpose of the Green Belt is to keep land permanently open by preventing urban sprawl. We welcome the fact that the consultation document (page 37) makes specific reference to the rationale and purpose of the Green Belt, highlighting those factors which are not the reasons for its designation. For example, because of landscape quality or ecological value. We agree that it is critical in terms of understanding the role and function of Green Belt to explain clearly what it is not intended to achieve, as well as its primary purpose.</p> <p>5.4 Paragraph 136 of the NPPF confirms that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. In this context, through the previous West of England Joint Spatial Plan (JSP) process, it was accepted by the partner Authorities that the test of 'exceptional circumstances' did exist to justify changes to the existing Green Belt.</p>	

Respondent Name	User Response: Text	Response Created
	<p>5.5 Whilst the JSP was ultimately withdrawn due to significant failings in the evidence base, critical issues related to housing need and delivery remain. Moreover, following the introduction of the LHNA and the recent changes to the Standard Methodology, specifically in terms of the implications for Bristol, it is our view that the context remains that the Plan-making process for South Gloucestershire and the wider WECA region, should advance on the basis that there are exceptional circumstances to alter the Green Belt.</p> <p>5.6 Page 37 of the consultation document acknowledges that through the Plan-making process there is the opportunity to consider whether changes to the Green Belt should be made. We fully support the need for a comprehensive review of the Green Belt as a key component of the evidence base to inform the future growth strategy for the Local Plan.</p> <p>5.7 Paragraph 137 of the NPPF makes it clear that before concluding that exceptional circumstance exist to justify changes to Green Belt boundaries, it should be demonstrated that all other reasonable options for meeting identified need for development have been examined fully.</p> <p>5.8 This should include:</p> <ul style="list-style-type: none"> a. Making as much as possible of Brownfield and underutilised land; b. Optimising the density of development; and, c. Being informed by discussions with neighbouring Authorities as to whether they could accommodate some of the identified need for development. <p>5.9 It is therefore essential that the proposed approaches set out in the Phase 1 consultation document, particularly ‘Urban Lifestyles,’ are progressed with sufficient pace in order to understand the realistic and achievable quantum of development that can be provided for within the urban areas.</p> <p>5.10 When drawing up or reviewing Green Belt boundaries, the NPPF (Paragraph 138) states that the need to promote sustainable patterns of development should be taken into account and that Planning Authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt, towards towns and villages inset within the Green Belt or locations beyond the Green Belt boundary.</p> <p>5.14 We support the recognition within the consultation document that the approach to the Green Belt needs to be considered in the context of balancing the need for new homes and jobs, services and facilities, with the need for sustainable development. This is the correct approach and it should be recognised that opportunities do exist to support sustainable patterns of development from sites/ locations that are currently located within the Green Belt.</p>	
Lesley Brown	Building block 2: expanding our main urban areas through small or large urban extensions	15 Feb 2021

Respondent Name	User Response: Text	Response Created
	<p>There should be no development of land in the Green belt except as a very last resort as per NPP. The plan seems to be presented throughout as if building in the greenbelt will be inevitable but I disagree that this has to be the case. It is extremely unfair that residents who have often bought properties overlooking greenbelt should face developments unless there is absolutely no other alternative. Any such developments should be as small as possible.</p> <p>Building Block 4 Rural villages and settlements No large growth should be allowed in rural settlements as it would ruin the existing makeup and character of the community and place undue pressure on local services.</p> <p>Building block 5 Large scale free standing developments There should be no large scale developments at all in the Greenbelt. It would ruin the existing makeup and character of the community and place undue pressure on local services.</p> <p>Investigating the Green Belt "Balancing the needs for new homes, jobs, services and facilities with the need for sustainable development" should not be used as a get out clause for building in the Greenbelt. Exceptional circumstances would have to be proved as per NPP and this would mean proving that absolutely no other possibility existed in either our authority or the neighbouring authorities albeit they will have their own housing needs.</p>	
Lizzie Staley	Market towns and rural villages need to be respected as such. Mass development ruins the whole attraction of a market town and rural village. People want to live in a rural village(or smaller settlement) or a market town because of the size and characteristics. People don't want to live there for it to be an Urban Area for many reasons.	28 Feb 2021
Lorna Wilcox	Do not build on Green Belt or AONB.	31 Jan 2021
Louise Powell - Thornbury Town Council	<p>The Town Council disagrees with the wording in block 3. There appears to be no account taken of the excessive development that has already taken place within Thornbury outside of a plan and without adequate infrastructure developments or improvements.</p> <p>It is important that if further development is to take place there needs to be increased employment and infrastructure improvements to make Thornbury sustainable. At the moment Thornbury, as the plan states, does not have adequate employment allocations or transport options to accommodate further growth.</p> <p>Any removal or greenbelt would need to be replaced with a similar sized area elsewhere to prevent urban sprawl.</p> <p>The planned transport network through the Local Transport Plan should not be what drives housing growth. It should firstly be about creating sustainable areas</p>	08 Apr 2021

Respondent Name	User Response: Text	Response Created
	of employment and housing and then transport should be reviewed after this is planned. E.g., it is unrealistic to think that Thornbury will have a direct metro bus route.	
Mactaggart & Mickel - Frampton Cotterell	<p>The five building blocks should not be seen as some form of sequential assessment. The most sustainable locations and sites for additional residential development should be identified.</p> <p>In that context, Mactaggart & Mickel control land at Poplars Farm, Frampton Cotterell which they consider eminently suitable for a residential led development.</p>	07 Apr 2021
Mactaggart & Mickel Homes England Ltd	<p>See attached representations.</p> <p>3.14 In respect of Building Block 1 (existing urban areas) it should be acknowledged that the areas identified are largely suburban in nature (the North and East Fringes) or market towns (Yate and Thornbury). Whilst the Plan is right in seeking to optimise these areas in terms of land use efficiency, the likelihood of achieving significant or high-density growth here is limited as planning policies will seek to ensure development is in keeping with the character of the surrounding areas. Any such urban housing capacity should be informed by robust evidence of land available, suitability and viability, rather than based on blanket assumptions of urban intensification and density.</p> <p>3.15 Building Block 4 seeks to investigate rural villages and settlements and is supported by our client. There are a number of highly accessible rural settlements across the District that have been prevented from growing and/or contributing to sustainable development as a result of restrictive policies, including the Green Belt. Key issue no. 26 acknowledges that the Core Strategy allowed for infilling within existing village boundaries but did not allocate any sites for planned growth in rural settlements, meaning many of these locations have seen very limited housing growth in the period since 2006.</p> <p>3.16 In respect of Building Block 4, the village of Almondsbury is noted to score highly in terms of the availability and frequency of Public Transport services to key destinations in the North Fringe of Bristol such as Bradley Stoke, Pathway/Aztec West and Cribbs Causeway, along with the market town of Thornbury, as shown in the Rural DAP Transport Analysis 2020 which forms part of the emerging evidence base. The Data & Access Profile also shows it to benefit from excellent access to local employment at the North Fringe, along with a good range of local services and facilities within the village itself. The evidence clearly supports Almondsbury as a sustainable location for rural growth under Building Block 4 and in accordance with paragraph 78 of the NPPF. Furthermore, any exclusion of this location during the Plan-making process would not be 'justified' and would raise an issue of soundness in accordance with NPPF paragraph 35.</p>	05 May 2021
Mactaggart & Mickel - Pilning	There are a number of rural settlements e.g. Pilning that have had no development in many years. This has had an impact on services and facilities. These settlements should be re-examined.	25 Mar 2021
Margaret Haynes	The structure of the plan seems very sensible. Personally, I would much prefer to see the focus on building in urban areas and urban extensions, followed by market	27 Feb 2021

Respondent Name	User Response: Text	Response Created
	<p>towns where there are facilities and infrastructure to sustain development, and where the balance of jobs to residents can be maintained. (That said, Chipping Sodbury and Yate have already grown and changed beyond all recognition since we moved here - Yate appears to have absorbed the growth fairly well, but Chipping Sodbury now appears to be at the point of being irrevocably altered, and I would be sorry to see further development around it.)</p> <p>Given that we were attracted to South Gloucestershire by its rural villages and beautiful countryside, I would be very sad to see the character of rural villages eroded and their lovely surroundings spoilt by development - I would hate to see our villages (including Wickwar, to which we moved because of its rural nature) become dormitory villages with an increasing number of residents who simply commute by car to Bath and Bristol.</p>	
Marian Gilpin	<p>Urban areas are well defined and still contain many brownfield sites. These should be developed whatever the cost. Also with more people working from home, planning permissions for change of use should be made easier. Many office blocks could be made into housing.</p> <p>Urban extensions can only go into the green belt. This should not be permitted at all.</p> <p>Market Towns are limited in their ability to expand. Many have already taken big housing developments with no identified areas designated for industry. They should only expand away from the Green Belt, not into it.</p> <p>New settlements are a great idea but only with high speed transport links to Bristol.</p>	09 Feb 2021
Mark Rosher - Charfield Parish Council	<p>Housing must go where employment exists or is feasibly accessed through high speed infrastructure. That means building in the rural villages, even if served by rail links very few will be able to access, cannot be deemed sustainable. The main housing need must be met in the urban fringes and larger towns.</p>	08 Dec 2020
Martyn Hall	<p>You don't make use of all empty buildings in and around Bristol so priority is to use them first before allowing building on flood plains !!! And land in Thornbury . You should be re using not building new !</p>	26 Feb 2021
Matt Griffith - Business West	<p>26. Urban Areas (Block 1): Building additional housing and employment capacity within the current Bristol North and East Fringe, Yate and Thornbury boundaries is the default and most logical option – given the long-standing development needs of these urban areas. This would require optimising the density and efficiency of the land, which is in line with the current and future socioeconomic trends. We are supportive of this vision, but we do not believe that this will suffice to meet the current development needs of the area over the next 15 years. Thus, this option must be complemented with a correct assessment of the demand in the area in order to solve the housing affordability and employment land constraints we are currently facing.</p> <p>27. Urban Extensions (Block 2): Expanding main urban areas through small or large urban extension beyond North and East Fringes into the Green Belt is practical and realistic. It is the most fitted and sustainable option to meet the current housing and employment demand of South Gloucestershire given that it would be linked to current transport and services infrastructure, which would be easier and most effective to improve and expand with further investment, boosting the quality</p>	25 Mar 2021

Respondent Name	User Response: Text	Response Created
	<p>of life and economic situation of these areas.</p> <p>28. Market Towns (Block 3): Growth around our market towns beyond Yate, Chipping Sodbury and Thornbury into the Green Belt and outside would also be an option we welcome, only after the shortcoming of the North and East Fringe are addressed. The South Gloucestershire Market Towns are an important asset of our geography and economy and must be protected and improved, a better range and calibre of services in these Towns will minimise the travelling needs of the communities around, increasing the sustainability of the area. There are however important transport considerations and obstacles that would either need to be addressed to prevent excessive car dependency, pressures on the wider transport network and exacerbating existing transport shortcomings.</p> <p>29. Rural Villages (Block 4): New medium and small scale development in and around the wide range of rural villages and settlement in the District, some outside and some inside the Green Belt and Cotswolds Area of Outstanding Natural Beauty is an interesting option with arguments to support it, but might not be a priority compared to the issues covered in Block 2 and 3. Achieving the scale of development in small settlements is unlikely to be enough to cover the housing needs for the wider area. Nevertheless, that does not mean that the issues faced by our rural villages should not be addressed, including better transport infrastructure and connectivity, local generated affordable housing need and more affordable housing options for people that look for greener and larger spaces amid the change of habits prompted by the pandemic.</p> <p>30. New Settlements (Block 5): Investing in large scale free standing new settlements within or outside the Green Belt is a challenging option. New Towns make most sense in a mainly rural context, where new standing settlements can be an effective way to deliver larger housing growth. However it makes less sense for a District such as South Gloucestershire, where urban extensions connected to existing urban areas are an easier way to deal with issues of transport and social infrastructure needs. The disbursement required in new services and infrastructure to ensure the sustainability of these new settlements could be used more efficiently in improving the quality, range and service of the existing infrastructures in other parts of South Gloucestershire.</p>	
Matthew Blaken - DJ&P Newland Rennie Ltd	The strategy needs to provide appropriate allocation to each and not exclusively to one block or the other. New settlements need to learn from the mistakes of the past and be truly holistic providing for social, educational, economic and recreational needs and not simply focus on house numbers	14 Dec 2020
Matthew McCollom	<p>Building block 2 Urban extensions using green belt.</p> <p>It seems to be a foregone assumption within this priority that green belt status must be removed from land adjacent to existing urban areas in order to expand these areas. One of the main purposes of Green Belt is to check the unrestricted sprawl of built-up areas and the merging of neighbouring communities. Reassurance about the permanence of the existing green belt boundaries was given to local residents when the section of ring road adjacent to Shortwood was completed.</p> <p>The green belt surrounding the village of Shortwood ensures that the village is able to retain its individual character and separate identity.</p>	28 Feb 2021

Respondent Name	User Response: Text	Response Created
Maurice Wayne	No	08 Feb 2021
Melinda Evans	Although the concept of these building blocks is fine, it is not clear whether Thornbury is seen as an Urban Extension or Market Town.	01 Mar 2021
Michael Sharpe-Neal	Whilst development is something that should be promoted in appropriate quantum and areas, the plan appears to be over simplifying the issues. Such proposals will result in the over development of rural localities and the loss of important locations; for example the setting of Thornbury castle and its environs and hamlets of historic listed buildings. Development will further the degradation of Thornbury as an historic market town and growth engulf fragile peripheral communities, permanently erasing their way of life. This is not to mention the impact on local wildlife. In the area between Thornbury Castle and Kington people regularly witness deer, bats, foxes, hares and even endangered newts and rare woodpeckers; all would be lost.	28 Feb 2021
Michelle Greaves	2, 3 and 5 need to be thoroughly considered and not just a go to - often expanding current urban and market towns (2+3) and new standalone sites (5) are the quick wins, but it leaves current urban areas in need of redevelopment and left half empty. Building block 1 is a priority	03 Feb 2021
Midland Commercial	<p>Please see enclosed submission.</p> <p>4.24 The approach to identifying “building blocks” is helpful but individual building blocks should not be seen as an answer to a sustainability development strategy in their own single right. The answer is more likely to require a hybrid or combined solution. When reviewing the consultation document, it does perhaps give the impression that it is focused at this stage on grappling with potential spatial solutions in respect of the need to accommodate housing led proposals, rather than employment development at this stage. That is perhaps understandable given this stage of the Plan making process and history of Plan preparation in this area, although we are sure it is something the Council will wish to address as the Plan moves forward – there is clearly a need to plan for housing and employment alongside each other in the Plan.</p> <p>4.25 In light of the focus of these representations on the future employment land strategy of South Gloucestershire we make the following short observations on each building block:</p> <ul style="list-style-type: none"> • Building Block 1 “existing urban areas” – there is a need to ensure that the focus on existing urban areas and previously developed land to accommodate new housing development does not result in a shortfall of employment land across the District. It may very well be necessary to provide for new employment land to make up any shortfall in employment land at different times over the Plan period; • Building Block 2 “expanding our main urban areas through small or large extensions” - this may very well form a significant part of a future development strategy, although a portfolio approach may be more appropriate and in respect of employment land the need to respond to market signals will be particularly important alongside the evidence base and Sustainability Appraisal work that the 	26 Apr 2021

Respondent Name	User Response: Text	Response Created
	<p>Council will need to progress;</p> <ul style="list-style-type: none"> • Building Block 3 “around our market towns,” this raises very similar considerations in terms of employment land to those raised in respect of building block two; • Building Block 4 “rural villages and settlements” - it is clearly right in the context of South Gloucestershire to investigate the potential for an appropriate level of sustainable growth at a wide range of rural villages and settlements in the District, although we would advocate I need to focus on sustainability criteria and options for existing and improved sustainable modes of transport, as well as, in the case of employment, the importance of market signals and the ability to deliver much needed employment land. In this respect, Falfield is particularly well placed to help contribute as part of any wider strategy identified through the emerging Local Plan, as addressed below; • Building Block 5 “large freestanding new settlements” - there is very little detail on this with in the emerging Local Plan and at this stage we would simply note the long-term lead in plans and bullet rates often associated with new settlement proposals (which often require a whole Plan period before they start to deliver at any significant scale) and there are additional complications in terms of the infrastructure required to deliver large-scale employment land and premises. <p>4.26 We welcome the fact that the Council is starting to explore how it could meet its growth requirements, but in addition to suggesting that further work is required in respect of the employment characteristics, we would also obviously highlight the need for further work once the SDS progresses and the employment land evidence base becomes available.</p>	
Mike Bennewitz	<p>I don't agree with classifying Thornbury as an Urban area in the same was as you are classifying North Bristol. Most of our population chose Thornbury as their location to live because of its proximity to a rural area (source Neighbourhood Plan survey). If you build houses to the extent you are required to do so you will destroy Thornbury as a rural location. It's not Urban as we live a long way from Bristol and there is no sustainable means of getting into town and North Bristol employment areas. Furthermore the Urban designs (which favour even more compact building and usage of space) are not appropriate for a rural area like Thornbury</p>	23 Feb 2021
Mr. A. D. England	<p>Please see enclosed submission.</p> <ul style="list-style-type: none"> • Deliverable sites which are in Urban Edge Locations in proximity with good accessibility to the urban edge of Bristol (such as Almondsbury) will be key in accommodating the growth needs of the emerging Plan; <p>Building Blocks:</p> <p>5.1 Within the scope of these representations we broadly support the Council's identification of the five Building Blocks. Whilst site selection and the portfolio of allocations proposed will be key to ensuring the soundness of the Plan, we consider that a blended approach incorporating all Building Blocks should be pursued.</p>	29 Mar 2021

Respondent Name	User Response: Text	Response Created
	<p>Indeed, there are opportunities for sites, such as land at Almondsbury to be progressed under a number of the Building Blocks set out (e.g., Building Block 2 and 4).</p> <p>5.2 Notwithstanding the above, we have outlined our client’s considerations in respect of each Building Block below.</p> <p>Building Block 1: existing urban areas:</p> <p>5.3 As previously set out, whilst our client recognises that National Planning Policy prioritises optimising urban areas, in the context of South Gloucestershire, there are real concerns that an over-reliance on Urban Lifestyle Locations will have a number of unintended consequences and not deliver sustainable development. Please refer to Paragraphs 3.4 and 3.5 above.</p> <p>Building Block 2: expanding our main urban areas through small or large urban extensions:</p> <p>5.4 This building block would see expansion into locations beyond the communities of the North and East Fringe, to meet the needs for new homes and jobs. In most cases, it would require development of land currently in the Green Belt. Our client fully supports the progression of this Building Block in delivering sustainable development.</p> <p>5.5 Almondsbury is a prime example of a sustainable settlement which has the potential for a small or large urban extension. Whilst it is located within the Green Belt, it is highly self-contained with a good level of employment and existing facilities all within walking distance. As can be seen from the Data & Access Profile for Almondsbury, the majority of facilities and all of the employment areas are located within a 800m radius. The settlement is identified as having positive credentials in the criteria for Green Belt development (as set out in Pages 152 to 159 of the consultation document) and is in close proximity to key facilities (Page 49). Development of land at Almondsbury should accordingly be identified under this Building Block.</p> <p>Building Block 4: rural villages and settlements:</p> <p>5.6 This Building Block would investigate large, small or medium scale growth around rural villages. Our client supports the growth of rural villages to ensure the vibrancy of existing services and facilities, to support the delivery of new community infrastructure and to avoid localised housing land supply issues and associated affordability impacts.</p> <p>5.7 When compared to other ‘rural settlements’ within South Gloucestershire, outside of the main towns (Yate, Thornbury) and urban fringes of Bristol, Almondsbury is considered to be one of the most sustainable due to this high level of accessibility.</p> <p>5.8 Further proposed MetroBus infrastructure will further widen the catchment of</p>	

Respondent Name	User Response: Text	Response Created
	<p>those areas close to the urban fringes of Bristol. The proposed extension to the MetroBus to Thornbury, complemented by a new Park and Ride (North of Almondsbury) and a strategic cycle link as outlined in the Joint Local Transport Plan 4 will make trips into Bristol City Centre and Temple Meads Train Station even more accessible for the local community.</p> <p>5.9 Our client is of the view that new homes need to be provided within established accessible locations with good levels of services, in addition to easy access to Bristol City Centre and beyond.</p> <p>5.10 Almondsbury has a far greater capacity for development and our client considers that it should be identified as a location within the Local Plan for growth under this Building Block (in preference to villages of a more rural nature). We have previously submitted evidence under the Call for Sites which indicated that land South of Gloucester Road, Cope Park and Crantock Drive and West of the M4 would comprise a sustainable form of non-strategic development at Almondsbury. To exclude otherwise sustainable development at the Plan-making stage here would not accord with the soundness test of “justified” (as set out in Paragraph 35 of the NPPF).</p> <p>Building Block 5: New Settlements:</p> <p>5.11 New settlements can provide the Council with consistency of supply which stretches beyond the Plan period. However, they have significantly longer lead-in times; for example, the timescale for new settlements obtaining Planning Permission is double that of sites between 100 – 500 homes [2]. A new settlement proposal will moreover have greater infrastructure requirements and will unlikely be capable of meeting the Plan’s early needs for the delivery of housing.</p> <p>[2] Start to Finish, Lichfields, 2016</p> <p>5.12 Our considerations in respect of a potential new settlement will relate to the detail of any site selected and we therefore reserve the right to comment further on this as the preparation of the Plan progresses.</p>	
Mr. and Mrs. Drew and Mr. and Mrs. Bennett	<p>Building Block B states, “This building block would investigate the potential for an appropriate level of sustainable growth (large scale or small and medium scale) in and around the wide range of rural villages and settlements in the District.”</p> <p>The above Building Block objective is supported. To ensure a balanced form of sustainable growth it’s appropriate that proportionate growth takes place at Rural Villages (particularly those that are outside of the Green Belt). Cromhall is such a Village that can benefit from proportionate growth.</p>	19 Apr 2021
Mr. Blake - Oldland Parish Council	<p>Something needs adding to 'cater' for Older peoples increasing needs as affected by these 5 'building blocks'</p>	17 Feb 2021
Neil Oviatt	<p>Urban lifestyle location are basically chewing up agricultural land outside of Thornbury.. You are developing fields and making Thornbury traffic awful leading to worse air quality with no infrastructure plans.</p>	30 Nov 2020

Respondent Name	User Response: Text	Response Created
	<p>You are also leaning Thornbury further and further to the a38 pushing residential near major routes with poor air quality.</p> <p>The strategy should push the design boundaries.. Developers make Millions from these builds so its time planners requested true character based developments (Real Stone, Solar, varient designs rather than the sea old blue, pink , yellow rendered boxes.. Check out a finished build off Morton way and Butt Lan! Bloor, Barrett, David Wilson - All the same old designs with different names and in 20 years time will have aged dramatically!</p> <p>If you want to invest and create long term areas which people wish to live and work in start putting pressure on the planners and developers to come up with some quality!!</p>	
Neil Salter - Avon County Scout Council	<p>Please see attached document.</p> <p>Notwithstanding, the scale of growth needed to meet South Gloucestershire’s need is known as this is calculated through the LHNA as being 1,412 new homes per year, as set out at Issue 27 of the consultation document.</p> <p>4.7 Whilst it is understood that there is no specific target identified through the SDS process, it is not clear why the new Local Plan, at this stage, cannot consider how locally derived housing need, i.e. South Gloucestershire’s LHNA could be accommodated.</p> <p>2. Expanding our main urban areas through small or large urban extensions.</p> <p>4.9 We generally support this approach as it provides opportunities to bring forward development at locations that have a good range of services and facilities as well as strong access/connectivity to such services by Public Transport.</p> <p>3. Growth around out market towns.</p> <p>There is no objection to growth at market towns as part of the wider strategy for achieving the scales of growth required to meet identified needs.</p> <p>4.11 However, we do refer to the acknowledgment within the consultation document that the current focus at these main towns has prevented the more rural settlements and locations within the District from receiving the benefits of well-planned development.</p> <p>4.12 The District’s market towns will rightly play an important part in future housing delivery, but this should be balanced alongside supporting sustainable levels of growth in suitable locations in the rural areas of the District.</p> <p>4. Rural villages and settlements.</p> <p>4.19 It is not adequately explained within the consultation document, or supporting evidence, how the figure of 200 metres from the edges of urban areas has been identified as a threshold within which development opportunities will be considered for potential growth.</p>	08 Apr 2021

Respondent Name	User Response: Text	Response Created
	<p>4.20 We also raise the question as to why a specific distance from urban areas, which we take to mean market towns and the Fringe areas, has been identified, but no similar distance from rural settlements, particularly those with a settlement boundary, is being applied.</p> <p>4.21 This 200metre figure does not appear to be based on a specific judgement and we question the legitimacy of it as a guiding principle for the selection of areas for assessment as potential development locations. There appears to be no reference to the connectivity and accessibility of rural locations as a criteria for selection and in turn assessment regarding their development potential/suitability.</p> <p>4.22 We generally support the approach whereby locations in and around villages and settlements with a defined settlement boundary will be considered as part of the investigation into future growth locations, but question why there is no distance applied in a similar way to the edges of urban areas.</p> <p>4.23 We also note that the consultation also confirms that this will also include “recognised collections of dwellings.” There is no specific clarity as to what constitutes ‘recognised collections of dwellings’ within the consultation document and as such, there should be greater clarity as how this is defined. This is considered important as it determines what areas are likely to be investigated as potential locations for future development locations.</p> <p>4.24 Land controlled by the Avon County Scout Council is located adjacent to the A38, within the Olveston Parish, with the rural (settlement boundary) settlements of Rudgeway to the North East (within 850 metres) and Almondsbury to the South West (within 475 metres) – locations identified as No. 2 and No. 44 on the Plan set out at page 121 of the consultation document. To the East is the rural settlement of Hortham Village (No. 26). The most Northern extent of the Bristol North Fringe is within 1.7km of the site (as the crow flies).</p> <p>4.25 It is not clear from the approach set out within Section 7 of the consultation document, whether this area will be investigated for potential growth as part of the strategy for rural villages and settlements. Notwithstanding, the context of the promoted land is clearly defined by the A38 and road frontage development that is characteristic of this area. Moreover, given the location of this promoted land to identified locations within the consultation document, it represents a logical area for consideration as part of the rural area strategy.</p> <p>4.26 The land promoted on behalf of the Avon County Scout Council does not fall within an area that is specifically assessed within the South Gloucestershire Data and Access Profiles (DAPs). The nearest area of assessment is that which has been prepared for Hortham Village.</p> <p>4.27 Notwithstanding this, it should be recognised that this potential development location benefits from regular transport services that will allow new development to access a range of uses, including employment, retail, education and leisure. The A38 provides access to Public Transport including the following services:</p>	

Respondent Name	User Response: Text	Response Created
	<p>? Stagecoach 10: Thornbury to Avonmouth (hourly), including links to employment centres at Aztec West, education at Frenchay Campus and healthcare at Southmead Hospital.</p> <p>? First (Gloucester Lynx) T1/T2 service – Thornbury to Bristol City Centre (hourly), including links to Cribbs Causeway and Harry Stock.</p> <p>4.28 Mindful of the good Public Transport connections available to our client’s site, it is noted that when considering the growth strategy for rural locations, the consultation document explains that sustainable travel for access to services and facilities should be a primary consideration. In doing so the approach will consider the following:</p> <p>? Proximity to key services by walking and cycling.</p> <p>? The level of access to effective Public Transport connections.</p> <p>? How new infrastructure may come forward that could improve access to sustainable travel in rural communities.</p> <p>4.29 Whilst it is recognised that the land promoted is not located within a defined settlement boundary, and does not directly adjoin such settlements, its suitability for development should be considered in the wider context of its location on a key Public Transport corridor and also its relationship with the rural locations of Almondsbury, Rudgey, Hortham Village and the proximity of this general area to the Bristol North Fringe.</p> <p>4.30 The consultation document (page 116) highlights the challenges facing rural locations due to low levels of growth, where it acknowledges that: “At the same time, many of our rural communities have seen comparatively low rates of growth, which has created problems with availability, choice and affordability of homes, impacting on the mix and balance of communities and local services and facilities (Our emphasis).</p> <p>4.31 Within this context we welcome the acceptance within the consultation document (page 117) that: “Planning for some level of growth, like new homes, employment and key services and facilities, in appropriate rural villages and settlements, can play an important role in making sure that the long term vitality, vibrancy and overall sustainability of our rural communities....”</p> <p>4.32 Therefore, the rural communities/locations and settlements within South Gloucestershire can not only support the wider strategic requirements for growth, by providing for greater resilience in housing supply, but localised growth in the rural areas can help to support and sustain such rural communities. The new Local Plan should therefore take a positive approach to growth in the rural areas, and not be constrained by simply rolling forward to the approach of the Core Strategy and limiting growth to a very small number of settlements.</p>	

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	<p>4.33 It is explained within the consultation document that when considering growth options for the rural areas of the District it is also necessary to consider the approach to Green Belt, given the fact that many settlements in the rural areas are located within the Green Belt designation. On this basis, two broad options are presented:</p> <ol style="list-style-type: none"> 1. Only investigate the potential for an appropriate level of small to medium-scale growth in villages and settlements outside of the Green Belt. 2. Investigate the potential for an appropriate level of small to medium-scale growth in villages and settlements both within outside and inside the Green Belt. <p>4.34 Option 1 does not, in our view present a reasonable option as it pre-determines the approach to the Green Belt in that it will remain unaltered. In doing so, it prevents the genuine consideration of site options and their ability to deliver sustainable patterns of development.</p> <p>4.35 We support the recognition within the consultation document (page 132) that Option 2 will result in the largest numbers of villages and settlements being considered and provide the broadest range of possible options to deliver the homes needed across South Gloucestershire.</p> <p>4.36 We consider specifically the approach to Green Belt in Section 5 of our representations.</p> <p>4.37 We support the conclusion set out in the consultation document (page 135), that unless there are significant constraints or suitability issues, all rural villages and settlements should be considered, to determine the role they could play in the strategy for sustainable growth of homes and jobs.</p> <p>5. Large scale free standing settlements.</p> <p>4.40 Whilst new free-standing settlements are a legitimate planning option in terms of providing large levels of growth over the Plan period, these options are often complex in terms of delivery and can be dependent upon significant new infrastructure to sustain such levels of growth.</p> <p>4.41 Issue 32 (Issues with housing delivery of large scale sites) articulates the challenges that come with large scale sites and ensuring they deliver as projected. Such issues will undoubtedly be equally, if not more applicable, to the delivery of large-scale freestanding settlements.</p> <p>4.42 Such options should not, in our view, be at the expense of the objective to broaden the portfolio of sites, both in terms of sizes and locations.</p>	
Newland Homes - Land at Aust Road	4.2 Urban Areas, which are generally home to a good level of existing services, facilities, employment opportunities and Public Transport connections, are considered to be among the most sustainable locations for development. As such, we are supportive of development within these areas which will, generally, be the most sustainable locations for new development.	14 May 2021

Respondent Name	User Response: Text	Response Created
	<p>4.3 The difficulty is in anticipating a realistic quantum of development that will come forward from this source. We will comment further on any anticipated delivery from this source once this is more clearly defined in future consultations.</p> <p>4.4 Regardless, it is rightly acknowledged within the Phase 1 document and Sustainability Appraisal (SA) that this source will not be able to meet the development needs of the District on its own and other 'building blocks' will need to be utilised within the spatial distribution strategy.</p> <p>4.5 Urban Extensions are supported on the basis that the communities of the North and East Fringes already benefit from strong levels of employment, services, facilities and Public Transport connectivity and, therefore, there is good potential for development in these locations to achieve high standards of sustainability.</p> <p>4.6 The Bristol North Fringe in particular boasts a wide range of services, facilities and employment opportunities with excellent Public Transport connections between them. Its importance as an employment hub for South Gloucestershire is also highlighted on page 47 of the infographic with significant levels of in commuting to the area, relative to out commuting (which is generally toward Central Bristol).</p> <p>4.7 Given its importance and the limited scope for further growth within the confines of the M4/M5 boundary, careful consideration needs to be given in respect of how development can be sustainably delivered in order to take advantage of the service and employment provision within it. An appropriate level of growth at the villages around the Northern Fringe (e.g. Olveston and Tockington) would be well related to the Bristol Urban Fringe and could complement any strategic levels of growth which come forward elsewhere (e.g. along the A38 corridor).</p> <p>4.8 For similar reasons, Market Towns are also generally considered to be sustainable locations for development, albeit their level of service and employment provision is below that of the Bristol Urban Fringes. The three Market Towns identified are Yate, Thornbury and Chipping Sodbury. Whilst we would generally support development at these locations, one needs to be mindful of both their capacity to expand further and the wider factors that influence sustainability at a macro level.</p> <p>4.9 For example, Thornbury has had significant levels of growth committed already at the town (c. 650 dwellings) which is expected to come forward over much of the Plan period. One may question whether there is enough latent demand to support further significant levels of growth under this Plan period, or if there needs to be a period of consolidation as existing commitments are built out. There is opportunity for some smaller sites closer to the Thornbury Town centre to come forward rather than continuing to add to the periphery of the town where facilities are sparse and relies on car use.</p> <p>4.10 Turning to Chipping Sodbury, whilst it has not been subject to significant levels of growth in recent years, one would need to examine the benefits of</p>	

Respondent Name	User Response: Text	Response Created
	<p>directing development to this location against alternative options. Whilst it would have good access to Yate and reasonable Public Transport connections to the fringes of Bristol, one questions whether development here is truly best located to maximise opportunities for active/public modes of transport. For example, development at to the North of Yate would be much better related to these key areas of the District and better placed to maximise active and Public Transport opportunities (e.g. MetroBus extension, the strategic rail network and key employment centres).</p> <p>4.11 Large-scale growth should be delivered in line with an optimally sustainable strategy.</p> <p>4.12 The Rural Villages building block includes a number of settlements of varying size, significance and unique circumstances that will influence what level of development could come forward at them.</p> <p>4.13 Aside from a handful of the rural villages (e.g. Coalpit Heath, Frampton Cotterell, Winterbourne and Charfield), the majority of other rural villages do not benefit from as significant a provision of services, facilities, employment opportunities or Public Transport connections and so a more modest level of growth should be directed toward them. However, it is imperative that an appropriate level of development can come forward at the rural villages in the interests of maintaining their vitality and viability. This is important to address affordability issues within rural areas, breathe new life into communities and support existing services and facilities.</p> <p>4.14 Villages such as Tockington and Olveston have a reasonable level of service provision within them, but have not been able to expand significantly in recent years as a result of Green Belt constraints. This has exacerbated affordability issue within the villages and put local services in danger of being lost. Allocating a proportionate level of growth at villages such as these can help to support and enhance their vitality and viability and should be explored within the new Local Plan.</p> <p>4.15 New Settlements can also make a valuable contribution to housing supply where there has been a sound approach to securing their delivery in a timely manner. Excellent examples of this would include the delivery of Cranbrook in East Devon and Northstowe in South Cambridge.</p> <p>4.16 As acknowledged within the Consultation Document, careful consideration needs to be given to any identified opportunities. A significant level of reassurance will need to be provided that the needs of the new community will be met and that they will come forward in a reasonable timeframe.</p> <p>4.17 New physical infrastructure (generally transport related) is often required to facilitate their delivery. The cost of this can either be prohibitive, affect viability or require external funding sources to secure their delivery. The latter is often reliant on being obtained via specific bid cycles. This can, in turn, affect the timely delivery of such new settlements. This will need to be borne in mind, especially</p>	

Respondent Name	User Response: Text	Response Created
	<p>given the shorter Plan period compared with the JSP.</p> <p>4.18 Once a set of sufficiently sustainable locations have been identified, deliverability should then be the key consideration in deciding which of these should be pursued. There are significant consequences associated with the failure of strategic sites to come forward (exacerbation of affordability issues, stymied economic growth, delays to key physical and social infrastructure etc). This is something that the Council should actively look to avoid.</p>	
<p>Newland Homes - Land West of The B4061 Bristol Road</p>	<p>4.2 Urban Areas, which are generally home to a good level of existing services, facilities, employment opportunities and Public Transport connections, are considered to be among the most sustainable locations for development. As such, we are supportive of development within these areas which will, generally, be the most sustainable locations for new development.</p> <p>4.3 The difficulty is in anticipating a realistic quantum of development that will come forward from this source. We will comment further on any anticipated delivery from this source once this is more clearly defined in future consultations.</p> <p>4.4 Regardless, it is rightly acknowledged within the Phase 1 document and Sustainability Appraisal (SA) that this source will not be able to meet the development needs of the District on its own and other 'building blocks' will need to be utilised within the spatial distribution strategy.</p> <p>4.5 Urban Extensions are supported on the basis that the communities of the North and East Fringes already benefit from strong levels of employment, services, facilities and Public Transport connectivity and, therefore, there is good potential for development in these locations to achieve high standards of sustainability.</p> <p>4.6 The Bristol North Fringe in particular boasts a wide range of services, facilities and employment opportunities with excellent Public Transport connections between them. Its importance as an employment hub for South Gloucestershire is also highlighted on page 47 of the infographic with significant levels of in commuting to the area, relative to out commuting (which is generally toward Central Bristol).</p> <p>4.7 Given its importance and the limited scope for further growth within the confines of the M4/M5 boundary, careful consideration needs to be given in respect of how development can be sustainably delivered in order to take advantage of the service and employment provision within it. An appropriate level of growth at the villages around the Northern Fringe would be well related to the Bristol Urban Fringe and could complement any strategic levels of growth which come forward elsewhere (e.g. along the A38 Corridor).</p> <p>4.8 For similar reasons, Market Towns are also generally considered to be sustainable locations for development, albeit their level of service and employment provision is below that of the Bristol Urban Fringes. The three Market Towns identified are Yate, Thornbury and Chipping Sodbury. Whilst we would generally support development at these locations, one needs to be mindful of both their capacity to expand further and the wider factors that influence sustainability at a</p>	<p>13 May 2021</p>

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	<p>macro level.</p> <p>4.9 For example, Thornbury has had significant levels of growth committed already at the town (c. 650 dwellings) which is expected to come forward over much of the Plan period. One may question whether there is enough latent demand to support further significant levels of growth under this Plan period, or if there needs to be a period of consolidation as existing commitments are built out. A handful of smaller-scale allocations around the settlement may be all that should be identified to come forward at Thornbury in addition to existing commitments over the next Plan period.</p> <p>4.10 Turning to Chipping Sodbury, whilst it has not been subject to significant levels of growth in recent years, one would need to examine the benefits of directing development to this location against alternative options. Whilst it would have good access to Yate and reasonable Public Transport connections to the fringes of Bristol, one questions whether development here is truly best located to maximise opportunities for active/public modes of transport. For example, development at to the North of Yate would be much better related to these key areas of the District and better placed to maximise active and Public Transport opportunities (e.g. MetroBus extension, the strategic rail network and key employment centres).</p> <p>4.11 As such, we generally only see Yate as a primary candidate in terms of being capable of delivering further large-scale growth within an optimally sustainable strategy.</p> <p>4.12 The Rural Villages building block includes a number of settlements of varying size, significance and unique circumstances that will influence what level of development could come forward at them.</p> <p>4.13 Aside from a handful of the rural villages (e.g. Coalpit Heath, Frampton Cotterell, Winterbourne and Charfield), the majority of other rural villages do not benefit from as significant a provision of services, facilities, employment opportunities or Public Transport connections and so a more modest level of growth should be directed toward them. However, it is imperative that an appropriate level of development can come forward at the rural villages in the interests of maintaining their vitality and viability. This is important to address affordability issues within rural areas, breathe new life into communities and support existing services and facilities.</p> <p>4.14 New Settlements can also make a valuable contribution to housing supply where there has been a sound approach to securing their delivery in a timely manner. Excellent examples of this would include the delivery of Cranbrook in East Devon and Northstowe in South Cambridge.</p> <p>4.15 As acknowledged within the Consultation Document, careful consideration needs to be given to any identified opportunities. A significant level of reassurance will need to be provided that the needs of the new community will be met and that they will come forward in a reasonable timeframe.</p>	

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	<p>4.16 New physical infrastructure (generally transport related) is often required to facilitate their delivery. The cost of this can either be prohibitive, affect viability or require external funding sources to secure their delivery. The latter is often reliant on being obtained via specific bid cycles. This can, in turn, affect the timely delivery of such new settlements. This will need to be borne in mind, especially given the shorter Plan period compared with the JSP.</p> <p>4.17 Once a set of sufficiently sustainable locations have been identified, deliverability should then be the key consideration in deciding which of these should be pursued. There are significant consequences associated with the failure of strategic sites to come forward (exacerbation of affordability issues, stymied economic growth, delays to key physical and social infrastructure etc). This is something that the Council should actively look to avoid.</p>	
Nicholas Small - Stagecoach West	<p>It should already be very obvious to the Council that to meet the likely development quantum, within the clear constraints and opportunities identifiable, will require a Spatial Strategy that leverages development opportunities of many different kinds. All these themes started to be explored in some depth through the preparation of the Joint Spatial Plan; it is far from the case that the Council is starting from a position of ignorance.</p> <p>The Building Blocks are a development site and opportunity categorisation: they are not, in any sense, a basis to formulate and evidence a Spatial Strategy in and of themselves. Which of these categories any site would fall into, is a response to its location and its potential scale, at least as much than a basis for assessing its actual appropriateness in meeting strategic objectives. The Building Blocks, while simple and understandable, misunderstand and misrepresent the purpose of planning, which is a dynamic and multi-faceted analysis, driven by key strategic objectives, not a simple categorisation or descriptive model. They cannot form the basis for an effective and evidenced Plan strategy – either this Plan, or, more properly the JSF. This inadequacy of this kind of approach to a very great extent was exposed by the failure of the now-withdrawn Joint Spatial Plan.</p> <p>In answer to the question “where should development go” the most correct response having regard to the role of the Plan, set by NPPF, is “wherever the JSF broadly directs it.”</p> <p>This is no flippant answer. The SGLP2020 must be in conformity with, and flow from, the Spatial Strategy set in the JSF, and, we submit again, this requires that strategy to have been properly evidenced and consulted upon, and advanced to a sufficient stage (no earlier than Reg 19 pre-Submission) for the subordinate SGLP to start to set out in more detail and in more depth the sites that will deliver that development quantum and supporting infrastructure in conformity with the Spatial Strategy across the SGC area.</p>	01 Mar 2021
Nick Hudson	I disagree because these will be just more of the same poorly built, inadequately insulated, inappropriately serviced trash that is currently being built.	15 Jan 2021
Nick Woodward	I think that rather than based upon geography, sustainability has to be a priority along with providing housing close to employment areas, thus reducing travel by	28 Feb 2021

Respondent Name	User Response: Text	Response Created
	car. Villages such as Wickwar with a two hourly part-time bus service and no safe pedestrian or cycle links to adjacent settlements cannot be further developed.	
Nicola Flack	I live in a rural village block, I agree that maximising small scale builds for local builders is an excellent way of providing more homes without damaging the block. I have concerns for all the blocks in terms of affordable housing. This only works where part ownership with for example local housing associations is baked in alongside housing association owned homes at affordable rents. Building affordable housing with no protection built in results in fist time buyers acquiring them new, then selling them on at a significant profit to landlords snapping them all up for rentals. This generates a rental ghetto with poorly maintained houses and no chance for other first time buyers to buy a home. Affordable housing is not achieved.	31 Jan 2021
Nicola Jordan	Many of the proposed building blocks ignore the fundamental principles of green belts and prevention of urban sprawl. We will soon be one big Bristol.	25 Feb 2021
Nicola O'Connell	I disagree strongly with any additional building on greenfield sites, particularly the large developments proposed for the areas surrounding Thornbury and other market towns. Access to natural countryside is essential for residents mental health and wellbeing, as highlighted during the Covid-19 pandemic, with the restorative benefits of natural settings being the most beneficial for good mental health and wellbeing. Settings, such as open farmland and natural views, cannot be replicated in the same way with more artificial settings like parks. In Thornbury countryside is within walking distance and so is free from the expense of owning or driving a car to access it, which is also better for the environment. At a time when mental health issues are rising, to take away the restorative benefits of open and natural countryside by building over it is cruel, misguided and irresponsible.	27 Feb 2021
North Thornbury Landowners Consortium	<p>We agree that the five building blocks identified encompass the broad range of areas where housing growth might be located and confirm our belief that a robust Local Plan will contain elements of all of these.</p> <p>It is important that to note that housing requirements are not yet agreed, but the evidence base gathered for the previous JSP indicated a significant need for housing across the District. Although the JSP document has now been withdrawn the position has not changed and neither has the potential for unmet demand from Bristol.</p> <p>In respect of Building block 1, given the scale of housing need, we agree with the Issues and Approaches document that it is unlikely that housing need for the District could be met from the urban areas, through regeneration, renewal or re-use of Brownfield land.</p> <p>In respect of Building block 2, whilst sustainable development should continue, we are worried that the significant expansion in recent years, with more growth planned, will degrade the area rather than provide a sustainable answer to support housing delivery. Most housebuilders in the North and East Fringe, would agree that the volume of sales outlets is starting to impact on delivery numbers and this is set to get worse. Directing significantly more development to this area could reduce the benefits of living in the area to all residents and be sub-optimal to sustainable future investment.</p>	29 Apr 2021

Respondent Name	User Response: Text	Response Created
	<p>In respect of Building block 5, whilst the principle may be ‘flavour of the month,’ recent experience has shown that the almost insurmountable problems of land assembly, delivery, infrastructure, transport and sustainability, make any meaningful contribution within a defined Local Plan period of less than 25 years extremely unreliable. Many schemes in other Local Authority areas have been relied upon in the early stages of a Plan process only to find that the reality for delivery is Decades away from that originally envisaged. Perhaps look now but expect real delivery in the next Plan period.</p> <p>We support the strategy envisaged in Building Blocks 3 and 4 and would expect that the highest proportion of the housing numbers should be delivered, outside of the Green Belt and AONB. This has the added benefit of spreading investment, economic growth and infrastructure improvements to enable sustainable connectivity, across the District. Also, because of the diversity of locations in Building blocks 3 and 4, these benefits would be spread across a number of housing market areas, fulfilling geographic need, consistent delivery and economic growth for the three market towns and rural settlements outside the Green Belt.</p> <p>These points are demonstrated by the NTLC site adjoining Oldbury Lane.</p> <p>The NTLC site represents an excellent opportunity to deliver attractive and sustainable growth at Thornbury which could deliver a wide range of benefits for the future and existing residents of Thornbury.</p> <p>The site was submitted to the recent Call for Sites (Land adjoining Spring Farm, Thornbury) and now with the addition of the adjoining land, the capacity should support around 350 homes. A full suite of technical appraisals will be available shortly, however initial desktop studies and initial site investigations lead us to believe that the site will support this level of sustainable growth, not restricted by constraints such as Green Belt, AONB, flood risk, landscape or heritage.</p> <p>The site's location should enable the provision of many positive benefits associated with the development proposals not at present available in this area of Thornbury, including the significant provision of usable recreational open space.</p> <p>Other benefits should include the provision of a good quality Public Transport connection into Thornbury (and then onto the North Fringe and into Bristol), walking and cycling links to neighbouring services and facilities including Schools, medical facilities and Thornbury town centre. The proximity of Thornbury town centre and its existing services will provide benefits for future residents and also support the existing retail and leisure premises in the town.</p> <p>We welcome the opportunity to discuss these representations with you and respond to any queries you may have.</p>	
P. Church	<p>See attached representations.</p> <p>In summary, it is necessary for a robust Spatial Strategy and housing delivery efficiency to deliver housing at both urban and sustainable rural locations. Rural</p>	27 Apr 2021

Respondent Name	User Response: Text	Response Created
	Settlements have a key role to play in delivering a sustainable Spatial Strategy (Building Block 4: Rural Villages and settlements), they should be investigated for their potential to provide a mix of small, medium or large scale growth depending on the supporting infrastructure and wider settlement sustainability principles.	
Patrick Williams	<p>As a set of 5 sectors then they are logical.</p> <p>Rural areas and market towns have taken a large part of the burden in the past cycles of development, Thornbury, Yate/Chipping Sodbury etc. Hence Rural areas and Market towns however must be protected, with only limited building using Brownfield sites e.g. former quarries and comparable sites so that the countryside is not impacted. Green Belt and AONB areas also need expansion where environmental and flood protection is needed, and to retain agricultural land, but also to increase tree plantations.</p> <p>New settlements should only be considered away from rural and market town areas. They should only exist in areas close to the Bristol Ring Road/M32 and main arteries in to Bristol and the surrounding immediate fringe inside the M4/M5 box, to reduce transport and CO2 impacts.</p>	09 Mar 2021
Paula Evans - Rangeworthy Parish Council	Brown field sites in urban areas should be explored first, ie empty office blocks/ shops within city centers being converted. Urban extensions would probably mean expanding into open countryside and greenbelt which would be contrary to SGC Climate Emergency Declaration and Declarations made by other Town & Parish Councils. Market towns expanded greatly during the second half of the 20th century into what was open countryside – to expand further means more farmland going under concrete. Rural villages attract residents because those people are attracted to village life and expansion means loss of that village character. New settlements have to be built on previously undeveloped land therefore more loss of farmland.	26 Feb 2021
Pauline and Richard Wilson	<p>1. Urban areas. Services that do not need to be in the town centre e.g. Fire and Ambulance centres in Yate, should be moved to a good communications site to enable speedy response and reduce noise of sirens in residential areas. This would enable elderly persons complexes to be built within walking distance of the shops, library, health facilities etc.</p> <p>Radburn-style developments as in South Yate have an awful lot of mown grass areas not capable of being used for informal leisure activity. There is potential for sympathetic infill of small numbers of houses.</p> <p>Developers should not be allowed to hang on to land that has planning permission but this is not carried out for years.</p> <p>3/4. Market towns and villages, if they are over-developed, no longer have the feel of market town or village.</p> <p>5. New settlements must be properly planned with a centre, facilities and employment. They should have a unique quality to them not just become an urban sprawl. It should be something that the area is proud of.</p>	25 Feb 2021

Respondent Name	User Response: Text	Response Created
Paul Randall	<p>Due to the way that the COVID-19 pandemic has changed working patterns and the need to be in an office all week, every week I feel that you should look t redevelop existing office units/empty office units that have been vacant for a significant period of time (for example 3 years +).</p> <p>This would cause minimal disruption as the infrastructure is already in place, and they would be ideal and cost effective to transform into flats/dwellings.</p>	16 Feb 2021
Persimmon Homes Severn Valley	<p>Please see attached document.</p> <p>4. Strategy – Where will new development go? (Section 5)</p> <p>4.1 The context within which this section of the consultation document has been prepared is that the final growth figures will be determined through the WECA Spatial Development Strategy (SDS). Notwithstanding, the scale of growth needed to meet South Gloucestershire’s need is known as this is calculated through the LHNA as being 1,412 new homes per year, as set out at Issue 27 of the consultation document.</p> <p>4.2 The Phase 1 consultation seeks to identify ‘building blocks’ and ‘guiding principles’ that are likely to shape the growth strategy of the new Local Plan. It is explained at page 61 of the consultation document that when developing the growth strategy the aim will be:</p> <p>? To meet agreed requirements for new homes and jobs with the objective to restore and enhance the natural environment at the heart of the approach.</p> <p>? To provide new homes and jobs that offer affordability and choice across a wide range of sites and locations throughout the District within essential infrastructure.</p> <p>? To improve the longer-term health, well-being and sustainability of the District’s communities, balancing new homes and jobs, built around a high quality, natural and built environment and the opportunities for physical activity, including children’s play, walking and cycling and access to formal and informal meeting spaces and green spaces.</p> <p>4.3 These overall aims of the growth strategy are supported as a matter of principle and the ‘building blocks’ identified to meet these aims are considered below.</p> <p>Building Block 1: Existing Urban Areas.</p> <p>4.4 This building block is focused on optimising the density and efficient use of land within existing settlement boundaries. As part of this strategy, the consultation document identifies the urban areas of the Bristol North and East Fringe, Yate and Thornbury.</p> <p>4.5 The emerging approach to planning for growth in the urban areas is set out within Section 6 of the consultation document (‘Urban lifestyles’). The aim of the ‘Urban lifestyles’ approach is to make the best use of land, including through increased densities and revised parking standards, in the most appropriate and</p>	11 May 2021

Respondent Name	User Response: Text	Response Created
	<p>sustainable urban locations, whilst providing high quality development that avoids negative impacts on people, character and assets in urban areas.</p> <p>4.6 Consistent with our earlier comments in respect of Issues 22 to 26, we acknowledge the aspiration to optimise development opportunities within the urban areas, principally on Brownfield sites. We do, however, repeat concerns that Brownfield land is a finite resource and, unless appropriate checks are in place, pressure to redevelop existing employment sites will lead to an imbalance of job opportunities and homes potentially leading to greater levels of commuting.</p> <p>4.7 For these reasons, and whilst acknowledging the role of this Building Block, we would ask that the Plan takes an honest approach by clearly explaining that sufficient new homes cannot be delivered by this strategy alone and, consequently, development on greenfield sites is a necessity. Further and given that the Urban Lifestyles approach is said to apply to the most sustainable locations, we would welcome a clear and unequivocal statement as to the unique relationship between the urban area of Yate and Chipping Sodbury given that they are often referred to as a single entity. As noted elsewhere, it is relevant to repeat the fact that our client's site East of Chipping Sodbury is not within the designated Green Belt or in the Area of Outstanding Natural Beauty.</p> <p>Building Block 2: Expanding main urban areas through small or large urban extensions.</p> <p>4.8 This approach is focused on the expansion of the main urban areas, specifically the Bristol North and East Fringe and in doing so, the consultation document acknowledges that this will require the release of development sites from within the Green Belt.</p> <p>4.9 Whilst we recognise that there may be some areas, particularly immediately adjoining the North and East Fringes of Bristol, that do not contribute to the purposes of Green Belt (NPPF paragraph 34), these are considered to be relatively few. Our concern is, therefore, that this Building Block could become the catalyst for wholesale, inappropriate releases of land from the Green Belt.</p> <p>4.10 We would also suggest, consistent with points made previously, that land on the fringes of Bristol is likely to play a key role in meeting the needs of the City. The progression of the WECA SDS is therefore fundamental in understanding the potential role of this Building Block whilst, at the same time, the emerging Local Plan must ensure that the needs of South Gloucestershire are provided for. Again, this should be made clear in the emerging Plan.</p> <p>Building Block 3: Growth around market towns.</p> <p>4.11 Persimmon Homes fully support this approach which is focused on the potential for sustainable growth at Yate, Chipping Sodbury and Thornbury and which represents a continuation of the tested strategy of the adopted Core Strategy. As such, we consider that this building block should form the main component of the emerging Spatial Strategy not least because it most directly meets the needs of</p>	

Respondent Name	User Response: Text	Response Created
	<p>South Gloucestershire as well as the potential to assist in meeting the needs of the wider sub-region.</p> <p>4.12 As has been made clear throughout these representations, Persimmon controls circa 68ha of land East of Chipping Sodbury which is appropriate, available and deliverable for a residential led, mixed-use development.</p> <p>4.13 We note, however, that this Building Block (page 64) states that such locations “include land currently designated as Green Belt and land outside of the Green Belt.” As the Plan evolves, with this Building Block at its core, we would suggest that it would benefit from a clear statement that those sites at the Market Towns that are outside of the Green Belt, such as East Chipping Sodbury, will be prioritised before consideration is given to those sites that are in the Green Belt. Such an approach/statement is entirely consistent with the NPPF which states:</p> <p>“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making Authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development” (NPPF para 137; our emphasis).</p> <p>4.14 Finally in respect of this Building Block, and as set out previously, we consider that the Plan would benefit from a clear statement as to the interrelationship between Yate and Chipping Sodbury to the effect that they, in reality, function as a single urban area whilst retaining their own identities. Such a statement would be entirely consistent with the Council’s position at the Examination into the (now) adopted Core Strategy when the presiding Inspector notes:</p> <p>“The Council describes Yate and Chipping Sodbury as independent but interrelated market towns (PSM7 paragraph 3.4) which make up the largest freestanding settlement in the District” (Inspector’s Report on the South Gloucestershire Core Strategy (November 2013) - paragraph 119).</p> <p>4.15 Further, it is noted that the diagrammatic map that sits alongside this Building Block (page 64) effectively shows to urban areas; the combined Yate/Chipping Sodbury and Thornbury. We support this presentation.</p> <p>Building Block 4: Rural villages and settlements.</p> <p>4.16 This approach is focused on those villages and settlements below the market town level, some of which are in the Green Belt and in many cases ‘washed over’ by the Green Belt. Other locations are also located in sensitive areas, such as the AONB.</p> <p>4.17 We have no objection to an appropriate level of development taking place in the more rural settlements, however, we are concerned with the statement that “There may also be potential to deliver larger-scale growth in some of our rural villages and settlements instead of, or in addition to, any proposals for small and medium-scale growth.”</p>	

Respondent Name	User Response: Text	Response Created
	<p>4.18 We would strongly suggest that caution is given on larger scale growth in the more rural villages and settlements, not least because many of these will either be within the designated Green Belt and/or Cotswolds Area of Outstanding Beauty. There is also the potential to create unsustainable travel patterns and this must be sharply contrasted with the entirely sustainable opportunity at East Chipping Sodbury.</p> <p>4.19 We have reviewed the further information on this approach provided at Section 7 of the Plan and the above concerns remain. Given that this potential approach is clearly at an early stage, we do not comment further at this time but reserve the right to do so as the Plan evolves.</p> <p>Building Block 5: Large scale free standing settlements.</p> <p>4.20 This approach is focused on the opportunity to create a new settlement, requiring large greenfield areas at locations which may be within the Green Belt.</p> <p>4.21 Whilst new free-standing settlements are a legitimate planning option to provide for large levels of growth over the Plan period, these options are often complex in terms of delivery and can be dependent upon significant new infrastructure to sustain such levels of growth.</p> <p>4.22 Issue 32 (Issues with housing delivery of large scale sites) articulates the challenges that come with large scale sites and ensuring they deliver as projected. Such issues will undoubtedly be equally, if not more, applicable to the delivery of large-scale freestanding settlements.</p> <p>4.23 Such options should not, in our view, be at the expense of the objective to broaden the portfolio of sites, both in terms of sizes and locations, or be considered as an alternative to sustainable opportunities on the edge of the Market Towns (Building Block 3).</p>	
Pete Connors	<p>Although I might agree with the building blocks I think the priority should be on urban areas and brownfield sites and smaller manageable developments within rural villages rather than larger developments which change the character of those settlements and place strain on infrastructure. Affordable and social housing should be prioritised in those areas rather than more expensive developments which tend to encourage relocation and commuting and the pricing out of local families.</p>	28 Feb 2021
Peter Box	<p>Market Towns and Rural Villages should only be required to provide homes for their own communities and not compelled to accept massive disproportionate developments for the benefit of neighbouring urban areas. Furthermore the phrase New Settlements smacks of a resurrection of the 'Garden Village' idea proposed for Buckover which was soundly rejected by the planning authorities. The original 'Garden Village' concept was initiated by one Ebenezer Howard in 1898, in which self-contained communities are surrounded by "greenbelts", containing proportionate areas of residences, industry, and agriculture. There would certainly be no space for a meaningful Greenbelt between Buckover and Thornbury and Mr Howard's villages at Letchworth and Wewlyn have long since disappeared in more</p>	23 Feb 2021

Respondent Name	User Response: Text	Response Created
	urban sprawl.	
Peter Rawlinson - Gleeson Strategic Land	<p>Gleeson agrees that it is important for the Local Plan to include a variety of sites in scale and location to ensure there is flexibility in site delivery and timing.</p> <p>It is recognised that making good use of previously developed land can provide new homes in sustainable locations, but it will also be important to ensure that sites allocated on Brownfield land are viable and deliverable. There has already been significant development on Brownfield land in the urban areas of South Gloucestershire and the supply of suitable previously developed land is consequently more limited. There needs to be a high certainty that sites will be developed in the timeframe required to contribute to the housing needs of the District.</p> <p>It is also important that the Local Plan delivers the number of affordable homes required and there is a risk that the additional abnormal costs of developing on Brownfield land could affect viability and potentially reduce the amount of Affordable Housing provided. Urban development should also be built to an appropriate density to reflect the immediate location and character of the area and to provide new homes that people will want to live in.</p> <p>Gleeson welcomes the approach of having an appropriate level of sustainable growth in and around the wide range of rural villages and settlements. Smaller and medium scale sites will form an important part of housing delivery in the earlier years of the Plan as they can often be approved and delivered more quickly than larger strategic scale developments. Such sites will also support existing communities in rural villages and contribute to the continued sustainability of these settlements.</p> <p>Gleeson also encourages the Council to properly investigate the role and function of the existing Green Belt boundaries and ensure a balanced and sustainable growth strategy. A number of sustainable settlements in the District are constrained by Green Belt but there still needs to be opportunities for growth in these locations and it would not be appropriate for communities surrounded by Green Belt to be forgotten. New development at the villages and rural communities is required to deliver market and affordable homes in the places people want to live and to ensure those communities continue to thrive and remain sustainable. New development can also inject variety to the housing provision at existing settlements. This is especially important in places with high house prices where younger people and families may be unable to afford a home and may currently need to move away from, their friends, family and existing community. This trend will lead to a less varied community which is important for social cohesion and well-being and to provide for the three key themes of social, economic and environmental objectives in the NPPF in achieving sustainable developments.</p>	10 Mar 2021
Phil Saunders - Safeagent	<p>SOUTH GLOUCESTERSHIRE COUNCIL'S ARTICLE 4 DIRECTION PROPOSALS A RESPONSE TO THE CONSULTATION FROM SAFEAGENT – FEBRUARY 2021 INTRODUCTION safeagent www.safeagents.co.uk is an accreditation scheme for lettings and management agents operating in the Private Rented Sector (PRS) safeagent firms are required to:</p> <ul style="list-style-type: none"> • deliver defined standards of 	26 Feb 2021

Respondent Name	User Response: Text	Response Created
	<p>customer service • operate within strict client accounting standards • maintain a separate client bank account • be included under a Client Money Protection Scheme</p> <p>Firms must provide evidence that they continue to meet safeagent criteria on an annual basis, in order to retain their licence. The scheme operates UK wide and has 1500 firms with over 2500 offices. safeagent is an accredited training provider under the Rent Smart Wales scheme and meets the requirements for training for agents under the Scottish Government Register. Recently, we have been approved by Government as a Government approved Client Money Protection scheme.</p> <p>Promoting Professionalism in the PRS safeagent’s engagement around the country, with various local authorities, suggests that lettings and management agents have a key role to play in making both mandatory and voluntary regulatory measures work effectively. Agents tend to handle relatively large portfolios of properties, certainly when compared to small landlords. They tend, therefore, to be in a position to gain an understanding of regulatory measures based on wider experience. They become expert in trouble shooting and ensuring that the balance of responsibilities between the agent and the landlord is clearly understood. This, amongst other things, can help to prevent non-compliance due to misunderstandings about local arrangements. safeagent ensures its members maintain certain operational standards, have Client Money Protection arrangements in place, keep separate client accounts and comply with their legal obligation to be a member of a redress scheme. We also provide training. All this can be of assistance to councils who are trying to drive up standards in HMOs and the PRS in general. Although agents are now required by law to belong to a government approved redress scheme, display their fees and publish their mandatory client money protection status, our experience to date suggests local authorities face challenges in enforcing these standards. Membership of bodies such as safeagent can reduce the need for the local authority to use its formal, legal powers in these areas.</p> <p>ARTICLE 4 – COMMENTS ON SOUTH GLOUCESTERSHIRE COUNCIL’S PROPOSALS</p> <p>Introductory Remarks - the Potential Impact of an Article 4 Direction</p> <p>We welcome South Gloucestershire’s decision to restrict the Article 4 Direction to targeted areas. We note that, if confirmed, this direction will require property owners to apply for planning permission before they change the use of the property from a family home to a small HMO for up to six people. This erects a significant barrier to the development of HMOs and may affect supply. We also note that, while considering planning permission applications, planning officers would look at whether an HMO is an appropriate development for the area. In our comments below, we argue that care should be taken to ensure that the Article 4 Direction does not restrict the availability of much needed affordable housing in the areas affected. We understand that, if the Council do grant planning permission, they can also set conditions on how an individual HMO should operate. However, no detail is provided in the consultation materials on what kinds of conditions might be imposed, or their interplay with other regulatory measures such as licensing. We would strongly suggest, therefore, that the council consult on a coherent, transparent and accountable framework for the setting of operational conditions, through the planning and other relevant systems.</p> <p>Supply of Affordable Housing</p> <p>We are concerned that the Article 4 Direction may act as a disincentive to landlords wishing to invest in the supply of much needed affordable housing. Furthermore, an Article 4 Direction may cause difficulties and reduce flexibility in the wider housing market. At present, smaller houses and flats can alternate between HMO</p>	

Respondent Name	User Response: Text	Response Created
	<p>and single family use, according to market demand. Under an Article 4 Direction, changing from a single family let to an occupancy of at least three people in two households would necessitate planning permission, the need for which would be a disincentive to making the change. Conversely, landlords of small HMOs are also likely to reject single family tenants when a property is relet, as they would lose established HMO use. It is clear, then, that the potential impact on supply goes far beyond just student accommodation. There is a wider population requiring low-cost accommodation, including welfare claimants, low-income workers and vulnerable groups. We would point out that many low-income workers are on the front line of essential service provision. This includes lower pay grade NHS employees, ancillary workers employed by service providers to the public and private sectors and Care Home staff. The growth of the gig economy and zero-hours contracts has increased the risk of homelessness amongst some groups, notably the 20-34 year old age range. This demographic is likely to occupy the PRS and shared forms of housing such as HMOs. It is also likely that some single/ vulnerable people may be living in HMOs because the council have directed them there as part of their efforts to prevent homelessness. If implementing an Article 4 Direction, it will be important to avoid a reduction in affordable housing supply for such groups. Demand is compounded by the fact that changes to the Local Housing Allowance have increased the number of people for whom a room in a shared house is the most (or only) affordable housing option (specifically, the under 35s) Wider changes to the benefits system – e.g. the introduction of Universal Credit – have increased the number of claimants in a vulnerable position financially. This group may seek out HMO accommodation as an affordable form of housing. The council needs to consider the possible negative impact of an Article 4 Direction on affordable housing supply for this demographic. A properly regulated PRS, which includes good quality HMOs, is the key to meeting this need. Broad brush measures such as Article 4 Directions should be used with care – and any potential unintended consequences taken into account. Regulation of HMOs Some provision, particularly for non-student tenants, may be in poorer quality HMOs. Some may be run by rogue landlords. As well as robust enforcement of Mandatory Licensing for larger HMOs, Additional Licensing and co-regulation may be a better approach to addressing these issues than the blunt instrument of an Article 4 Direction (please see our detailed comments on Additional Licensing, below) As we point out above, more detail should be provided on what kinds of conditions might be imposed when planning permission is granted. If the interplay with other regulatory measures, such as licensing, is unclear then these conditions will represent yet another piecemeal attempt to regulate the PRS and HMOs. We would strongly suggest, therefore, that the council consult on a transparent and accountable framework for the setting of operational conditions through the planning system. This will help to ensure that landlords and agents have the opportunity to comment on the detail. It will also help to avoid a proliferation of (potentially clashing) regulatory measures. We would welcome a collaborative approach. For example, accredited lettings agents, such as those firms that are members of safeagent, are very well placed to deal with issues such as Anti-Social Behaviour in HMOs. The council should work with them to “regulate” the impact of HMOs through a coherent, transparent and appropriate regulatory framework, drawing on South Gloucestershire’s positive experiences of “co-regulation” under the recent city wide Selective Licensing scheme. Balanced Communities and Regeneration Positive impacts of HMO</p>	

Respondent Name	User Response: Text	Response Created
	<p>development can include reduced housing vacancy rates, support for local facilities and the provision of an affordable form of housing. For example, some of South Gloucestershire’s student population may choose to stay and work in South Gloucestershire after studying. This may be a factor creating ongoing demand for affordable private rented accommodation such as HMOs. The possible impact of an Article 4 Direction on supply should be carefully considered in this context. Indeed, concentrations of students can often have a beneficial effect on neighbourhoods (e.g. on night-time economy, culture, viability of facilities etc) The wider point here is that the impact of educational establishments in South Gloucestershire is broadly considered to be positive – but staff (including staff employed by suppliers of services) as well as students need HMO accommodation in significant numbers. In the absence of appropriate complementary measures, an Article 4 Direction may put this in jeopardy. ADDITIONAL LICENSING Rather than just restricting supply (and/or imposing planning conditions) we think the council should consider using Additional (as well as Mandatory) Licensing to address the issues. In our view, licensing should be implemented in partnership with landlords, agents and their accrediting bodies. In our detailed comments below, we point out some of the areas where compliance with typical licensing standards is an inherent part of the safeagent scheme. Tenant Referencing We would be supportive of any requirement to obtain references for prospective tenants. safeagent is actively involved in promoting good practice in tenant referencing. We would be happy to discuss our work in this area with the Council. Tenancy Management safeagent agents are expected provide and fill in a tenancy agreement on behalf of the landlord. they will always make sure the terms of the tenancy are fair and help the tenant to understand the agreement. They will always provide clear information to the tenant about any pre-tenancy payments and what these cover. They will explain any requirement for a guarantor and what the guarantor role entails. At the end of a tenancy, they will always serve the tenant with the correct period of notice as set out in the tenancy agreement. Under safeagent’s service standards, agents are required to take a deposit to protect against possible damage. They are required to explain the basis on which the deposit is being held and the purpose for which it is required, as well as to confirm the deposit protection arrangements. When joining safeagent, agents are asked to provide details of the number and value of the deposits they have registered with the scheme. Agents are asked to authorise safeagent to contact the scheme to verify this information. During the course of a tenancy, safeagent agents will check the condition of the property and draw up a schedule to outline any deductions to be made from the tenant’s deposit. They will return the deposit in line with timescales and processes required by the statutory tenancy deposit schemes. safeagent agents are also required to:</p> <ul style="list-style-type: none"> • have a designated client account with the bank • operate to strictly defined Accounting Standards • be part of a mandatory Client Money Protection Scheme. <p>These requirements provide additional security for client monies held, over and above the requirements of the South Gloucestershire licensing scheme. Again, this is an area where increased safeagent membership would be of benefit to the Council and local tenants. Property Standards Under safeagent’s service standards, safeagent agents are expected to visit any property to be let with the landlord and advise on any action needed before letting the property. This includes any repairs and refurbishments needed to put it into a fit state for letting. They will also go with possible new tenants to view unoccupied property. Tenants can, therefore, be confident that safeagent agents</p>	

Respondent Name	User Response: Text	Response Created
	<p>have provided advice to the landlord concerning any repairs or refurbishments which are necessary. safeagent agents are expected to explain both the landlord's and the tenant's the rights and responsibilities. To guard against misunderstandings, they will arrange for the preparation of a schedule of the condition of the property. safeagent agents are required to ensure that tenants are provided with copies of safety certificates on gas and electrical appliances before they commit to the tenancy. They will provide details of the condition of the property, plus a list of its contents. The property will have undergone all required safety checks on furnishings, and gas and electrical services. Thereafter, safeagent's standards require agents to carry out property inspections periodically, as agreed with the landlord, in line with normal good practice. safeagent and our firms would anticipate inspections to be carried out every 6 months as a minimum, to identify any problems relating to the condition and management of the property. In line with common practice, records of such inspections would contain a log of who carried out the inspection, the date and time of inspection and issues found and action(s) taken. Under a licensing scheme, this information could be shared with the council in an appropriate format. Tenants will be fully aware of access arrangements. safeagent agents are expected to arrange in advance a time for access, in order to inspect the condition of the property in accordance with the tenancy agreement. safeagent agents will arrange to have routine maintenance work carried out, up to a limit agreed with the landlord. The agent will refer expenditure above that limit to the landlord. Training safeagent offers training to those who have been involved in lettings and management for some time as well as those who are just starting out. Training is available for principals of firms as well as employees. Thus, safeagent's Virtual Learning Environment (VLE) is designed to cater for a wide range of professional development needs. Training is easily accessible and can be undertaken when it suits the trainee. Any candidate completing the safeagent Foundation Lettings Course successfully also has the opportunity to use the designation 'safeagent qualified'. safeagent Foundation Lettings Course (Wales) is also approved training recognised by Rent Smart Wales, the Welsh Government's regulatory body as meeting the requirements for agents to have complying with their licensing requirement. One advantage of this approach is that it makes it easy to ascertain (through on-line monitoring) that participants have in fact undertaken the required training, prior to or immediately after accreditation. Modules available cover: • Pre-tenancy issues • Responsibilities and liabilities • Setting up a tenancy • During a tenancy • Ending a tenancy • General law concepts, statute vs contract • Relationships • Obligations • Process • Considerations for corporate tenants • Continuing Professional Development (CPD) In addition, safeagent provides mini online courses designed to cover a number of elements in more detail, as appropriate to the learner's role, include topics such as: Assured Shorthold Tenancies (ASTs) Client Money Consumer Protection Regulations (CPRs) Deposits Disrepair Electrical Appliances & Safety Gas Appliances & Safety Houses in Multiple Occupation (HMOs) Housing, Health & Safety Rating System (HHSRS) Inventories and schedules of condition Joint Tenancies Notice Requiring Possession To sum up, safeagent agents have access to an extensive training package, engagement with which should reduce the need for the local authority to intervene. Although not a condition of safeagent membership, safeagent offers accreditation through an online foundation course as well as qualifications such as BTEC Level 3 in Lettings and Management practice. Anti-Social Behaviour The</p>	

Respondent Name	User Response: Text	Response Created
	<p>report notes that, whilst there is an overall correlation between HMO concentrations and measures of “harm”, there are significant caveats to drawing conclusions from this. It recognises that, whilst the data analysis does broadly show a correlation between measures indicating harm and areas where there are concentrations of HMOs “nearly all the statistical measures considered in the study are not directly attributable to HMOs and are instead considered as a ‘proxy’ for the impacts communities have reported” For our members, dealing with actual and perceived anti-social behaviour in the PRS is a day to day activity. However, in general, we have concerns about the assumed link between the amount of PRS/ HMO accommodation in the neighbourhood and the incidence of ASB. The report points out that there is a weak case in the data to attribute harm, which may be symptomatic of wider issues such as deprivation, crime and substance misuse, specifically to HMOs. There may be some correlation between incidences of ASB and the prevalence of HMO/PRS accommodation in an area. However, correlation does not imply causation. The causes of ASB are many and varied. It is not, in our view, reasonable to expect agents and landlords to play a disproportionately large part in tackling them. We would, therefore, strongly advise against any proposals which imply a parity of approach between the PRS and the social rented sector. Social landlords are publicly funded (and regulated) to develop and manage housing on a large scale. Their social purpose brings with it wider responsibilities for the communities in which they work. As private businesses, PRS landlords and their agents, whilst having clear responsibilities to develop and manage their properties professionally, cannot reasonably be expected to tackle wider social problems.</p> <p>Fit and Proper Person Test All principals, partners and directors of a safeagent firm are asked to make the following declaration on application: – “I confirm that: for a period of 10 years prior to this application I have had no conviction for any criminal offence (excluding any motor offence not resulting in a custodial sentence) nor have I been guilty of conduct which would bring the Scheme or myself into disrepute; I am not an undischarged bankrupt nor is there any current arrangement or composition with my creditors; I am not nor have I been a director of a company which has within the period of 10 years prior to this application entered into liquidation whether compulsory or voluntary (save for the purpose of amalgamation or reconstruction of a solvent company) nor had a receiver appointed of its undertaking nor had an administration order made against it nor entered into an arrangement or composition with its creditors; nor have I at any time been disqualified from acting as a Director of a company nor subject to a warning or banning order from the Consumer Markets Authority or the Department for Business, Enterprise and Regulatory Reform. If I am subject to any current claim or am aware of any impending claim for professional negligence or loss of money or if I have been the subject of any investigation by the Consumer Markets Authority and/or local Trading Standards Office, full details of the circumstances are set out in a report enclosed with the application; all information provided by me in connection with this application is, to the best of my knowledge, correct”</p> <p>Complaints All safeagent firms are required to have a written customer complaints procedure, available on request. Our guidance sets out how the first step for complainants is to ask the firm they are dealing with for a copy, which will outline the method by which they can seek to resolve any issues. In line with statutory requirements, all safeagent members must also be members of a recognised redress scheme.</p>	

Respondent Name	User Response: Text	Response Created
Progress Land Ltd	<p>P. 64:</p> <p>Building block 2 is considered to be sensible where this would release greenfield land appropriately located to facilities but not where it would remove parts of the Green Belt and impact on the reasons for including that land in the first place (Paragraph 134 NPPF). This building block should be considered after building block 5 in order to achieve an appropriate form of development across the Local Plan area and deliver flexibility and follow national policy. This is particularly the case for housing land in the East Fringe which has fewer employment opportunities.</p> <p>P. 65:</p> <p>As noted above and in the consultation document, there will only be so much development that can be accommodated through the redevelopment of Brownfield sites and that, where large numbers of homes and jobs are required, national policy states that greenfield extensions to urban areas, towns and villages may offer the next best opportunity in meeting need. This should be done with caution though to ensure that the urban area is not too intensively developed for damage quality of life for residents and workers and the urban fringe should not be expanded to result in poor connectivity and extended distances to facilities as this will not be sustainable or result in saturated existing community facilities such as Schools and health centres.</p> <p>The Council is of course correct to assess options across the five identified ‘building block’ options, but it is our view that particular focus should be paid to the fifth block - Large scale free standing new settlements – as this option provides the best potential to plan for new sustainable development in a progressive manner, as per the proposed reforms in the Planning White Paper (i.e. increasing focus on sustainability and quality design).</p> <p>The site identified within our client’s control is considered wholly appropriate to provide sufficient land to properly plan a new Garden Village in a location which is positioned on existing key transport infrastructure. It is appropriately located to the West of the A38 and is supported by Stagecoach (letter of support provided with previous representations). Furthermore, it offers the potential for critical mass to aid with the sustainable objectives for the creation of a self-sustaining Garden Village of circa 5,000 homes.</p> <p>With the White Paper reforms in mind, it is clear that Garden Villages offer a fresh slate, not just to meet housing numbers and increase employment opportunities in a clean, properly planned way, but to enhance the environment and the quality of life for those that live and or work in such areas. With the on-going global changing pandemic of COVID-19, extra emphasis can, and must, be targeted towards homes which can provide not just sustainable credentials, housing and employment, but also new places that support mental health and wellbeing.</p> <p>The changing trend to working from home is also a social change that is likely to affect both housing and employment figures and reduce the need to travel with</p>	11 May 2021

Respondent Name	User Response: Text	Response Created
	<p>more virtual meetings and working practices. Garden villages, in this respect, can accommodate these modern necessities and on-going social changes whilst creating pleasant outdoor space for the population to enjoy. It is important to make the best use of urban land however, it is also necessary to not over-populate existing areas, thus placing additional strain on existing infrastructure and services.</p> <p>The consultation document states that large sites “will require careful investigation to support the delivery of sustainable new communities, like the necessary provision of key infrastructure, services and facilities. The relationship of any new proposed settlement to existing settlements will also need to be considered.”</p> <p>We would contend that initial work undertaken on behalf of our client, and that on behalf of the promoters of the adjacent site at Buckover, goes some way start the ‘careful investigations’ required to ensure that the sites can be delivered. Similarly, the relationship of both sites to Thornbury is of utmost importance – adequate and proportional improvements in infrastructure will be required, to ensure that Thornbury residents are not prejudiced by the new development. However, there is clear potential for new development (driven by the economies of scale given the size of both sites combined) to provide new infrastructure which would have a clear net benefit to existing residents (i.e. new Public Transport and open space provision).</p> <p>To this end, we held previous discussions with the Council on the potential to provide more growth in the Sycamores/Buckover location and shared Concept Diagrams (appended to previous representations). These demonstrate that if a greater critical mass were delivered in this location to form a larger Garden Village there is a benefit in terms of the type and scale of facilities provided and therefore the need to travel is reduced.</p> <p>The illustrative material identified the difference between a 3,000 home GV and a 5,000 home GV. With the increased population comes additional patronage for employment opportunities, shops and facilities and transport all of which provide a more self-sustaining and sustainable settlement. It would also reduce the need to affect the Green Belt which protects the current relationship between adjacent settlements.</p>	
R. Brown	<p>Building Block 2, Expanding our main urban areas through small or large urban extensions There should be no large scale development of greenbelt land. If as a final last resort after all possible other options have been exhausted. Only small developments be allowed. If necessary these should be dispersed throughout the greenbelt so as not to impact on the effectiveness of the greenbelt. Urban sprawl should not be allowed to happen which is one of the major reasons for the greenbelt. Relocation of the greenbelt must not be an option.</p> <p>Building block 4, Rural villages & settlements No large scale development should be allowed as it would damage the existing character of a community and overload local services.</p> <p>Building block 5, Large scale free standing developments</p>	25 Feb 2021

Respondent Name	User Response: Text	Response Created
	<p>These should not be allowed in any of the greenbelt. If necessary they should be placed outside the greenbelt near to major transport routes such as the M5/A38 to allow easy commuting routes to major areas of employment without affecting other communities.</p>	
Rachel Beard	<p>Building more residential homes on flood plain, greenfield and greenbelt land is not acceptable.</p> <p>In the guiding principles for developing a growth strategy point 3 states that "the natural and historic environment is recognised as an essential tool in helping to deliver the social, economic and environmental benefits that attract people to live and work in the district. The protection and enhancement of our natural and historic environment is at the heart of national policy for achieving sustainable development."</p> <p>This is entirely contradicted by the inclusion of development sites which would build on our green spaces and sites of historic interest. - SG 426.</p>	28 Feb 2021
Rebecca Beloe	<p>I am predominantly concerned about & would like to register my opposition to the proposed new development at Quarry farm / Park Mill Farm sites between Thornbury & Kington. I live at Fewster Farm in Kington, a grade 2* listed farmhouse which dates back to 1380 & is as such of significant historical interest. Besides the obvious worry of becoming engulfed by the ever spreading urban sprawl of Thornbury, the area is rife with wonderful wildlife which no doubt would be decimated should this development go ahead. On our property alone we have spotted badgers, fox, bats, hedgehogs, several varieties of newt (including greater crested!) several types of woodpecker, buzzards, grass snakes & we even found a tiny lizard / gecko of some sort!</p> <p>The proposed site is also crossed by several well used public footpaths which are a great asset to everyone in Thornbury & surrounding area where people can escape the built up areas & enjoy the countryside / nature.</p> <p>The road outside my house (Kington Lane) often floods during any sustained period of rain as the local stream pool brook is barely able to cope with the quantity of water as it is. Should the area above be covered in houses / asphalt no doubt this would get significantly worse & could result in the flooding of several local properties from time to time.</p> <p>The local lanes are very narrow & winding, in several places is not safe for two cars to pass in opposite directions & are already rather busy, I don't believe they could cope safely with the increase in traffic that would be caused by a new development.</p>	01 Mar 2021
Rebecca Woodward	<p>Surely rather than geography sustainability has to be priority and providing housing close to employment to reduce travel by car is essential. Villages like Wickwar with a two hourly part time bus service and no safe pedestrian or cycle links to adjacent settlements cannot be further developed.</p>	28 Feb 2021
Redcliffe Homes	<p>The five building blocks should not be seen as some form of sequential assessment. The most sustainable locations and sites for additional residential development should be identified.</p> <p>In that context, Redcliffe Homes controls land at Church Lane, Cromhall which they consider eminently suitable for residential development.</p>	04 Mar 2021
Redcliffe Homes	<p>Please see enclosed representations.</p>	01 Jun

Respondent Name	User Response: Text	Response Created
	<p>2.4 There are a range of different types of settlements across South Gloucestershire, and therefore a vast array of issues to address which in our view could not be solved through the adoption of one specific 'Building Block' as a Spatial Strategy. It is our view that a blend of the Building Blocks should be put forward to address the different key priorities and issues raised within the consultation document, with a significant proportion of land being allocated on the edge of Bristol, followed by Market Towns, with rural towns and villages receiving a proportion of need to address their individual concerns (for example, sustaining local facilities, bringing in investment via CIL to local Parish Councils to spend on local infrastructure projects, and addressing surplus capacity available in Primary Schools).</p> <p>2.5 We do not agree with the principle of allocating a new freestanding settlement if this involves land at Buckover, or anywhere in the Northern periphery of South Gloucestershire, being pursued as a development option. We have set out on many occasions within our representations to the JSP why we did not agree with such an approach and how it scored very poorly in terms of sustainability assessment. The problems associated with such a strategy primarily relate to the impact this will have on Carbon emissions and air quality as it will result in residents travelling South to work in Bristol; and the infrastructure funding gap that was identified within the evidence base to the JSP as a result of needing to significantly extend the MetroBus infrastructure to the North.</p> <p>2.6 We therefore consider that a 'blend' of Building Blocks will be required to meet the needs of South Gloucestershire and unmet need from Bristol, which will include a review of Green Belt land and release for large scale allocation, followed by a proportionate level of development on the edge of Market Towns and Rural Villages/Settlements, such as Old Sodbury.</p>	2021
Redrow Homes (SW)	<p>Please see enclosed representations.</p> <p>3.3 As we have set out in previous reps to the JSP, and as part of our separate submissions to the SGLP Phase 1 document, we consider it essential for legibility that a weighting system be applied to the SA assessment to aide legibility for the general public. If this is done and accepting the SA conclusions in respect of the 5 'building blocks' the most sustainable options for development include the reuse of underused land within existing urban areas, followed by urban extension to Bristol, as Figure 2 below illustrates:</p> <p>Figure 2. Assessment of 'Building Blocks' SA work with weighted system applied.</p> <p>Please see the attached document for Figure 2 (as referenced above).</p> <p>3.8 So, while assessing the potential to maximise the use of existing urban areas this should be realistic in terms of how these competing priorities are balanced, to ensure yields from this supply source are realistic. This will then identify a robust residual need that must be delivered elsewhere within the Authority area, by adopting the alternative 'building block' approaches.</p> <p>3.9 This residual housing need that cannot be accommodated within existing urban</p>	29 Apr 2021

Respondent Name	User Response: Text	Response Created
	<p>areas, which we believe the Council agrees with us will be a substantial amount, should then be distributed in accordance with the SA work on the Spatial Strategy, reacting to other policy and socio-economic factors. Based on the current, and previous JSP SA work, in our view this clearly places an emphasis on meeting Bristol's needs as close to its urban edge as possible, or in locations where Public Transport links to the city are strong, such as at Yate.</p> <p>3.10 However, we also appreciate that there are a range of different types of settlements across South Gloucestershire, and therefore a vast array of issues to address which in our view could not be solved through the adoption of one specific 'Building Block' as a Spatial Strategy. It is our view that a blend of the Building Blocks should be put forward to address the different key priorities and issues raised within the consultation document, with a significant proportion of land being allocated on the edge of Bristol, followed by Market Towns such as Yate, with rural towns and villages receiving a proportion of development needed to address their individual concerns (for example, sustaining local facilities, bringing in investment via CIL to local Parish Councils to spend on local infrastructure projects, and addressing surplus capacity available in Primary Schools).</p> <p>3.11 We do not agree with the principle of allocating a new freestanding settlement if this involves land at Buckover, or anywhere in the Northern periphery of South Gloucestershire, being pursued as a development option. We have set out on many occasions within our representations to the JSP why we do not agree with such an approach, but this primarily relates to the impact this will have on Carbon emissions and air quality as it will result in residents travelling South to work in Bristol; and the infrastructure funding gap that was identified within the evidence base to the JSP as a result of needing to significantly extend the MetroBus infrastructure to the North to make this proposal even remotely accessible to the wider area, and avoid such a development becoming a large scale dormitory settlement.</p> <p>3.12 We therefore consider that a 'blend' of Building Blocks will be required to meet the needs of South Gloucestershire and unmet need from Bristol, with the focus first being existing urban areas to ensure the most is being made of existing Brownfield and other opportunities within existing communities; and then the majority of the residual housing provided in urban extensions, which given the availability of jobs should be located adjacent to the Northern Fringe of Bristol, then finally a smaller proportion of growth provided at Market Towns (particularly at Yate for the reasons we will go on to explain) and sustainable rural settlements to reinforce their roles and ensure their longer term viability.</p> <p>6.3 Based on the emerging evidence, and that presented as part of the JSP, we consider that after the use of land within existing urban areas has been maximised to deliver housing and employment growth, significant greenfield land will be required to meet SGC, and the wider WoE areas, development needs. This should be primarily located in sustainable locations such as on the edge of Bristol, near to existing employment and service hubs, and where it can support the continued role and function of important settlements such as Yate, which provide excellent Public Transport links into Bristol and facilities of their own which makes it a suitable</p>	

Respondent Name	User Response: Text	Response Created
	location to accommodate growth.	
Richard Bentham	Please promote motorcycles as a mode of efficient, low pollution, less congested commuting. Your plan mentions them twice. Not good enough! Provide secure parking & promote awareness with roadside poster campaign. Your report often states the commuting/shopping distances are too far or difficult to walk. Cycling is suitable for some people travelling a few miles. Not everyone is able to cycle. With new development looking to reduce car parking then more 2 wheelers instead of cars can achieve this	26 Jan 2021
Richard Lloyd	<p>The first building block is particularly important given the need to reinvigorate town centres and high streets, not least in the light of significant changes in retailing which have been accelerated as a result of the Covid-19 pandemic.</p> <p>A review of the inner boundary of the Green Belt is long overdue which could potentially allow a number of carefully considered, compact extensions to communities along the North and East Fringe.</p> <p>The market towns have seen much recent growth – especially in Thornbury – as a result of speculative development beyond the provisions of the current Local Plan. Any review of Green Belt boundaries to accommodate further growth should include consideration of designating additional areas of Green Belt to firmly delineate the extent of further growth and provide certainty.</p> <p>The villages and smaller settlements are an important and valued component of the character and heritage of South Gloucestershire. While small and possibly medium scale organic growth may be acceptable and desirable both in non-Green Belt and Green Belt areas, proportionate in scale to the size of each settlement, I consider that larger scale growth of the villages and smaller settlements should be avoided.</p> <p>The potential for large free-standing new settlements should be assessed. However, in my view they should be an option of last resort. It is difficult to see how free-standing new settlements could be sited in new truly sustainable locations. There would also be conflict with safeguarding productive agricultural land as far as possible.</p>	03 Mar 2021
Richard Pendlebury - Anchor Society	<p>National policy suggests that where large numbers of homes and jobs are required, and the level of growth can't be accommodated from the re-use of brownfield land, greenfield extensions to urban areas, towns and villages may offer the next best opportunity in meeting need.</p> <p>This seems a very sensible approach. Brownfield then greenfield extensions.</p>	22 Feb 2021
Richard Walker - Lightwood Strategic	We are pleased to see recognition that, in-principle, small urban extensions (as well as large ones) provide a credible option for the growth of the main urban areas of the North and East Fringe. All reasonable options adjoining the North and East Fringe, of all sizes, need to be considered and evaluated. Due to the presence of the M4 and M5, urban extension options to the main urban areas beyond these barriers will need to achieve a critical mass to be able to demonstrate place-making credentials. Consequently, Green Belt land take would be significant in such locations.	01 Jun 2021

Respondent Name	User Response: Text	Response Created
	<p>Options beyond the A4174, which, in places, is not such a barrier to movement into the North East Fringe, can credibly offer slinked smaller (or larger) urban extension options and quality placemaking.</p> <p>The Council is clearly aware of the pitfalls of relying on a small number of very large sites, which presenting various degrees of complexity (as set out in Key Issues 32 and 33). Whilst stepped trajectories can be justified where several large sites with infrastructure prerequisites are needed, this ‘stepping’ should not be at the expense of the allocation of more deliverable i.e. non-strategic sites that can deliver housing sooner in the Plan period. Rock House Farm, Shortwood is one such example. The Examination of the St. Albans Local Plan (now withdrawn) and the Inspectors' April 2020 letter identifies that it is high risk to over rely on a few strategic sites in terms of (1) the need of an overly steeped delivery trajectory and (2) overlooking a suite of small-medium sized sustainable extensions (100 - 300 homes) with less Green Belt impact.</p> <p>At present the definition of scale when reading across Blocks 2, 4 and Section 7 is not clear. Our inclination is that small/medium is being used in a relative sense within Building Block 4, not an absolute one.</p> <p>As the Plan progresses Council needs to be clear if its scale bar in respect of small or medium scale development rural settlements is being used in relative terms or absolute terms, and this follows through into Section 7. At present our reading of Section 7 is that medium scale, in that, context is being used in relative terms.</p>	
Robert Harris - Olveston Parish Council	<p>Do you have any comments on the five building blocks (Urban Areas, Urban Extensions, Market Towns, Rural Villages, New Settlements)?</p> <p>There can be little argument with the first four blocks identified but the same cannot be said for the fifth level i.e., New Settlements.</p> <p>All of the first four blocks can be based on the existence of current local facilities or an enhancement of those facilities and of the development of improved connectivity. Any New Settlement would require a much higher degree of resource commitment, diversion of usable agricultural land and development time in order to fulfil the required needs in a truly sustainable way.</p> <p>Controlled, sympathetic development of our existing stock should lead to a much clearer identity for the region and its basically rural nature even where this leads to the increase of semi-urban areas such as the north and east fringes of Bristol. This could be facilitated by a careful, planned review of the necessary areas of Green Belt that are necessary to achieve a balanced approach to the wide-ranging needs of our diverse communities.</p>	26 Feb 2021
Robert Hitchins Ltd	Please see enclosed submission.	01 Jun 2021
Robert Hitchins Ltd and Harrow Estates PLC	<p>Please see enclosed submission.</p> <p>We broadly support the five Building Blocks identified by South Gloucestershire</p>	01 Jun 2021

Respondent Name	User Response: Text	Response Created
	<p>Council which are helpful in illustrating the options available. In reality more than one option may well be needed to meet the development needs of South Gloucestershire. To ensure the soundness of the emerging Local Plan we would continue to emphasise the importance of providing a diverse portfolio of sites in a range of sustainable locations to accommodate growth across the region. The sustainability credentials of future sites will inevitably be subject to further consideration as the process continues, however proximity to the existing urban area of Bristol, connectivity to strategic employment provision and accessibility to transport infrastructure should form essential factors to achieve more sustainable patterns of development. We would anticipate the Spatial Strategy being informed by a combination of all respective Building Blocks.</p>	
Robert Keen - Elms NHW	<p>Infrastructure is key to link these</p>	23 Feb 2021
Robin Perry	<p>Building anything anywhere unless infrastructure exists to support that building should not happen. The building blocks must be where infrastructure can be created or shown to exist. Choosing a development area based on location, Urban, Market Towns etc. is flawed. This makes no attempt to properly consider if a comprehensive infrastructure can be created for new building without adverse impact on existing resident or adjacent communities. Blocks should be based on the areas ability to provide or create an infrastructure for that development.</p>	21 Feb 2021
Roger Hall	<p>See TRAPP'D response.</p>	25 Feb 2021
Rohan Torkildsen - Historic England	<p>We note a consideration of the implications, challenges and positive opportunities for the historic environment in relation to your spatial options (Buildings Blocks) and we anticipate due weight will continue to be applied in accordance with legislation and national policy.</p> <p>A consideration of the integrity and setting of your historic landscapes, townscapes and individual heritage assets clearly needs great care when identifying suitable locations for development, and we imagine further local evidence may be prepared as such. However all proposed spatial options/building blocks appear to provide a potential suitable means to accommodate new development which is compatible and complementary to historic character if such proposals are contextual and responsive to a places design, scale and form.</p>	10 Mar 2021
Rosalyn Pyle	<p>No, I don't agree with the five building blocks specifically building blocks 2 and 5 for the reasons already outlined in respect of building on the greenbelt. It contradicts the principle of sustainable housing development. New settlements in the Green Belt would damage any rural identity creating an ugly blot on the landscape and it would be very difficult to cultivate a community in a newly built rural village.</p>	28 Feb 2021
Roy Irwin	<p>As the 5 building blocks cover every eventuality it is hard to see where development would not feature.</p> <p>In planning for development there are matters of scale and pace. SGS needs to establish collar and cap arrangements so that years of inactivity are not then replaced by a flood of new developments overwhelming a location. For rural villages and hamlets better to agree a steady flow of infills (a collar) rather</p>	01 Mar 2021

Respondent Name	User Response: Text	Response Created
	<p>than a massive 500 unit development every 50 years (exceeding the annual cap) Also need to weigh views carefully when a parish is oversubscribed with planning applications but where the parish council is only interested in part of its area.</p>	
Ruth Hall - Wessex Water	<p>Building Block 1 existing urban areas Please see comments under 'Issue 22' above regarding development of brownfield sites. Wessex Water is in the process of constructing the North Bristol relief sewer https://www.wessexwater.co.uk/services/sewerage/schemes/north-bristol-relief-sewer which will direct waste more efficiently around north Bristol to our water recycling centre in Avonmouth. The Frome Valley relief sewer and North Bristol relief sewer will ensure our system copes with ongoing and future development in and around north Bristol.</p> <p>Building Block 2 expanding our main urban areas through small or large urban extensions 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.</p> <p>Building Block 3 growth around our market towns Please see comments under Building Block 2 above regarding extensions to existing settlements.</p> <p>Building Block 4 rural villages and settlements 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:</p> <ul style="list-style-type: none"> • Oldbury on Severn • Cromhall • Tytherington • Rangeworthy <p>Building Block 5 large scale free standing new settlements Depending on the scale and nature of the proposed new settlement(s), new sewage treatment works may be required. During master planning suitable site(s) should be identified and safeguarded.</p>	02 Mar 2021
Sam Scott - South Glos Labour Group of Councillors	<p>We are unable to agree or disagree with question 6 as we need to wait for the results of the call for sites before we can comment on this.</p> <p>The document contains no numbers for the amount of new houses required, and we would also ask if it is flexible enough to cope with changes caused by the impact of North Somerset joining WECA etc.</p>	02 Mar 2021

Respondent Name	User Response: Text	Response Created
	<p>On page 68 the plan mentions key bus routes, but some key bus routes such as 73 and 75 are missing. The plan is focused on the metro bus which doesn't deliver passenger numbers or serve many of our traditional residential areas.</p> <p>We are concerned that the council is using the climate emergency as a reason to build on the Green Belt – is this the case? There is no policy of Green Belt protection in the climate emergency plan. There have been a number of examples of planning applications which have been approved for building on the Green Belt.</p> <p>What evidence needs to be provided that brownfield sites have been looked at? What is the criteria for rejecting a brownfield site in favour of a Green Belt? - Cost, Time, Contamination etc.</p> <p>General consensus is that the Claimant response requires the continued protection of the Green Belt, that it should be enhanced, made more accessible and used to develop and maintain our biodiversity.</p>	
Sarah Blackmore	<p>The current COVID-19 pandemic has seen a seismic shift in the way that people are working, with many working from home. It is highly likely that this will change working practices going forward and may mean that it is no longer vital for people to live near to where they work.</p> <p>We are aware of speculative planning applications in the Coalpit Heath & surrounding area that are being approved (for example Engine Common – 207 houses) due to the planning officers belief that the South Gloucestershire 5 year housing supply is marginal.</p> <p>Green belt should only be built on as a last resort</p>	08 Dec 2020
Sarah Blackmore - VALID Action Group	<p>We understand that there needs to be housing growth in South Gloucestershire, however it is imperative that new developments are proportional to existing settlements and do not overwhelm them. Building on Green Belt should be considered an absolute last resort. Priority should be given to affordable housing and consideration should be given to using Rural Exception Sites to encourage housing available for people who live and work in the area.</p>	26 Feb 2021
Sarah Hardcastle - Friends of Ridge Wood	<p>Building blocks sound fine, but strongly feel that unplanned speculative development in rural areas should not be permitted going forward. Another option would be to give earlier consideration to new settlements, as this would avoid damaging the character and nature of existing rural areas.</p>	28 Feb 2021
Sarah Raymond	<p>I believe green belt should be preserved</p>	25 Feb 2021
Sara May	<p>The new estates built since 2013 on the north and east edges of Thornbury are designed to make their residents dependant on their cars even though they will tend to be of a younger demographic. More estates of the SAME TYPE OF DESIGN around Thornbury and other places would encourage even more car use in a time of climate catastrophe and work against the Councils' very welcome aim to be net zero by 2030</p>	01 Mar 2021
Sean and Jacqueline	<p>Strategy should always be brown fill first and anything affecting the Green Belt or surrounding recreation areas as a last resort.</p>	26 Mar 2021

Respondent Name	User Response: Text	Response Created
Rinaldi		
Simon Atwell	What about our Green Belt?	16 Feb 2021
Simon Fitton - YTL Developments (UK) Ltd	YTL completely supports the principle of focusing effort on optimising the contribution from the existing urban area and available previously developed land. This is entirely in line with NPPF paragraph 117 that seeks to make as much use as possible of this resource. Paragraph 118 requires planning policies and decisions to give substantial weight to the value of using suitable Brownfield land within settlements for homes and other identified needs.	16 Mar 2021
Simon Moore	There must be no further increase in the urban area of South Gloucestershire	28 Feb 2021
Simon Steele-Perkins - Waddeton Park Limited	They are as useful a way of structuring a discussion about the possible ways of meeting the development needs as any, provided as seems clear enough in the consultation, they are not to be regarded as alternatives when some permutation of development in each of the location types will almost certainly be required.	06 May 2021
Sophie Spencer - CPRE Avon and Bristol [South Gloucestershire District]	<p>We interpret the designation of the building blocks as expressed, as another means to ignore the fundamental principle of the Green Belts, namely, the prevention of urban sprawl. Only Block 1 is listed as being independent of encroachment. Page 66 has the title 'Investigating the Green Belt', all previous 'investigations' have started with the premise that it is expendable, and the result has been the exact opposite of the fundamental purpose, Greater Bristol has expanded into South Gloucs. Others have protected the Green Belt, there is no need to investigate, the time has come to draw the line.</p> <p>Blocks 1, 2 and 3 are one and the same. It matters not that a site is within or on the perimeter of an urban area or defined as an urban area, urban extension, or market town. Whereas domestic and non-domestic emissions are sensibly independent of location, transport which contributes around one third of carbon emissions, is not. It therefore makes sense to site new dwellings close to employment or around existing low energy transport hubs. Identifying building blocks by common character is to our reasoning, not sensible. The document in emphasising the existing road transport infrastructure appears to be confused and to be harping back to JLTP4 and its reliance on new roads, motorway junctions and Smart Motorways which the Secretary of State for Transport has said may well be abandoned due to increased fatalities. The less well-off cannot afford cars or fares and are dependent on being close to services. To date this has been mostly ignored by the private sector who see provision of affordability as an inconvenience which they overcome by making financial contributions which are added to the sale prices. How is this to be changed?</p> <p>Everyone, developers apart, admit that the West of England's most pressing need is for affordable houses but the Plan in proposing the Blocks, implies that S Gloucs is still wedded to low density, car serviced development in all areas other than inner urban. If this is the intention, then the stated aims of carbon neutrality and preventing sprawl are insincere.</p> <p>Block 4. Maximum housing density conducive with the character of the surroundings must</p>	02 Mar 2021

Respondent Name	User Response: Text	Response Created
	<p>be given great weight because the communities in this category have a greater reliance on private cars. We contend that densities of less than 25 dwellings per hectare should be a rare exception rather than the rule. As we said earlier, sensitively designed housing densities help achieve carbon neutral targets, allowing shops and services to be accessed on foot, as well as supporting public transport provision.</p> <p>Block 5. It seems to our evaluation, that new settlements must be discounted as they conflict with the NPPF and the Secretary of State’s reassurances concerning harm and being distant from the employment centres, incompatible with the necessity to minimise carbon and particulate emissions. Any new settlements should be designed with the aim of following the example set out in the Freiburg Vauban Sustainable Settlement where 70% of the residents have chosen to live without a car.</p>	
<p>South West Housing Association Planning Consortium (HAPC)</p>	<p>Of the remaining four building blocks set out in the consultation document, the HAPC acknowledges the potential of all four options to deliver housing in sustainable locations. It is essential that housing is in sustainable locations close to existing or new facilities, services and jobs and in locations that are or will be well connected and accessible. It is essential that affordable housing is developed in sustainable locations to enable residents to thrive in an established support network.</p> <p>There is a pressing need for South Gloucestershire to build more homes, so it is imperative that South Gloucestershire takes a proactive Plan led approach and allocates sufficient sites in the new Local Plan. Understanding the consultation document, it appears that progressing any of the four building block numbers 2 to 5 would likely result in a review of the Green Belt in order to identify the best locations for development. The NPPF permits alterations to Green Belt boundaries through the production of a new Local Plan where exceptional circumstances are fully evidenced and justified.</p> <p>We encourage the Council to consider reviewing the role of each of its settlements and their corresponding settlement boundaries. The supporting text for building block 4 acknowledges that there are a number of smaller settlements that are ‘washed over’ by the Green Belt. Page 114 of the consultation document describes how development in the rural settlements of South Gloucestershire has mostly been restricted to infill opportunities and that the benefits of well-planned growth has not been felt. In addition, the Council had also found that its rural settlements have been subject to speculative Applications. Reviewing the settlement boundaries will help to prevent such speculative development while providing opportunities for development to meet rural housing need. Well-planned housing growth can provide market and much needed affordable housing, new employment opportunities, improved infrastructure and it often supports existing local services and facilities.</p> <p>Green Belt:</p> <p>Referring to the two options for investigating the Green Belt as shown on page 132, we show support for Option 2 as it provides the broadest range of options for future development as it considers a larger number of villages and settlements to deliver the homes needed for communities across South Gloucestershire. It is likely that</p>	<p>14 May 2021</p>

Respondent Name	User Response: Text	Response Created
	<p>buildings blocks 2 to 5 of the proposed development strategy would require some form of Green Belt review in order to undergo assessment and suitability.</p> <p>The NPPF permits alterations to Green Belt boundaries through the production of a new Local Plan where exceptional circumstances are fully evidenced and justified. Key strategic policies, such as market and affordable housing need, 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. For this reason we would advise that there may well be a case for releasing sites from the Green Belt, given the growing pressure for additional housing within the Authority area and the need for it to be in sustainable locations.</p>	
<p>South West Strategic Developments (SWSD)</p>	<p>Please see enclosed representations.</p> <p>6.0 OPTIONS FOR GROWTH:</p> <p>6.1 We have identified that both the previous JSP evidence base, and the emerging SA work undertaken in support of the SGLP, clearly points to the strategy of concentrating development at the urban area of Bristol as the most sustainable option for growth, albeit in our view, there will always be a need for a blended approach to ensure that other priorities are addressed (i.e. focusing some development on rural settlements and market towns to sustain their function and viability).</p> <p>6.2 As we have set out, it is our view that the SDS needs to be setting a strategic-scale strategy quickly to ensure that the SGLP can adhere to it. However, the Local Plan consultation document sets out five ‘building blocks’ which could form part of a Spatial Strategy for the delivery of homes and other development across SGC; these are set out as follows:</p> <ol style="list-style-type: none"> 1. Existing Urban Areas; 2. Urban Extensions; 3. Growth around Market Towns; 4. Rural Villages and Settlements; 5. Large-scale free standing new settlements. <p>6.3 We agree that Building Block 1 ‘Urban Areas,’ which involves a focus on regenerating Brownfield land (within the areas of the North and East Fringe of Bristol, Yate and Thornbury) and scores most highly in SA terms should be a priority for SGC. This approach also conforms with national planning policy as there are clear sustainability benefits of redeveloping existing sites.</p> <p>6.4 However, at the next stage of the process, we hope that there will be a defined number of homes to be delivered which will come forward via a realistic and robust assessment of available land within the Authority area.</p>	<p>31 Mar 2021</p>

Respondent Name	User Response: Text	Response Created
	<p>6.5 The work previously undertaken by NASH Partnerships ‘Maximising the potential of Urban Living,’ whilst a good starting point, was only ever designed to be a high-level assessment of potential land available in support of the JSP. As the SGLP is now focusing on site-specific allocations, it is our view that this should be further developed to identify specific sites that are capable of redevelopment or existing committed sites where it is thought that densities can be increased. This should be the first step, which will then help identify what residual supply needs to be delivered elsewhere within the Authority area.</p> <p>6.6 However, the Council has pragmatically identified that it is highly unlikely that the need for new housing and jobs can be met within existing urban areas. Therefore, a blended approach with the next most sustainable option should be selected to deliver the majority of the residual needs that urban intensification cannot deliver.</p> <p>6.7 As we have already set out, the second preferable option involved the ‘urban extensions’ building block which is further described as: ‘expansion into locations beyond the communities of the North and East Fringe, to meet the needs for new homes and jobs. In most cases, it would require development of land currently in the Green Belt.’</p> <p>6.8 By directing residual growth towards the urban extensions options the housing that is required in SGFC would be directed towards this area where demand is greatest, i.e. Bristol. If located adjacent to the Northern Fringe it would also have the benefit of locating residents in a location where the ratio of jobs to residents is at its highest, meaning it will most likely harness the ability for people to access employment by means other than the private car.</p> <p>6.9 As we have already set out in earlier sections of this statement, we have serious concerns for SGC’s ability to meet Climate Change objectives and reduce the need to travel if the Green Belt is not reviewed and some land adjacent to Bristol released for development. With respect to WGC, we will go onto discuss in the next section of this statement how the overall purposes of the Green Belt can be retained, and no further urban sprawl will occur.</p> <p>6.10 Following the pursuit of Building Blocks 1 and 2, we acknowledge that there are a range of different types of settlements across South Gloucestershire, and therefore a vast array of issues to address. In our view this could not be solved through the adoption of one specific ‘Building Block’ as a Spatial Strategy. It is our view that a blend of the Building Blocks should be put forward to address the different key priorities and issues raised within the consultation document, with a significant proportion of land being allocated on the edge of Bristol, followed by Market Towns, with rural towns and villages receiving a proportion of development needed to address their individual concerns (for example, sustaining local facilities, bringing in investment via CIL to local Parish Councils to spend on local infrastructure projects, and addressing surplus capacity available in Primary Schools).</p> <p>6.11 We do not agree with the principle of allocating a new freestanding settlement</p>	

Respondent Name	User Response: Text	Response Created
	<p>if this involves land at Buckover, or anywhere in the Northern periphery of South Gloucestershire, being pursued as a development option. We have set out on many occasions within our representations to the JSP why we did not agree with such an approach, but this primarily relates to the impact this would have on Carbon emissions and air quality due to residents travelling South to work in Bristol; and the infrastructure funding gap that was identified within the evidence base to the JSP as a result of needing to significantly extend the MetroBus infrastructure to the North to make this proposal even remotely accessible to the wider area, and avoid such a development becoming a large scale dormitory settlement.</p> <p>6.12 We therefore consider that a ‘blend’ of Building Blocks will be required to meet the needs of South Gloucestershire and unmet need from Bristol, with the focus first being existing urban areas to ensure the most is being made of existing Brownfield and other opportunities within existing communities; and then the majority of the residual housing provided in urban extensions, which given the availability of jobs should be located adjacent to the Northern Fringe of Bristol, then finally a smaller proportion of growth provided at Market Towns and sustainable rural settlements to reinforce their roles and ensure their longer term viability. This approach will require a review of Green Belt land and release for allocation to ensure the most sustainable development pattern is achieved.</p> <p>6.13 It is our view that this is the most sustainable way to combat Climate Change as this strategy will reduce the need to travel, whilst also meeting the future needs of the population and supporting the economy.</p> <p>8.5 Yes, we agree that the five building blocks identified are reasonable Spatial Strategies to explore and consider at the current time for the SGC area. However, as we set out elsewhere the interrelationship with the regional SDS, which will also set a Spatial Strategy, needs to be carefully considered.</p> <p>Do you have any comments on the five building blocks (Urban Areas, Urban Extensions, Market Towns, Rural Villages, New Settlements)?</p> <p>8.6 For the reasons set out in earlier sections of our representations, we have some concerns that the Local Plan is pre-determining a strategy that is intended to be set by the Spatial Development Strategy at a regional level. Clarification is required by the WECA, and SGC, to identify which tier of Authority will be setting the appropriate strategy for the region is and what the scope of each Plan will be to avoid inconsistencies.</p> <p>8.7 Notwithstanding the above concern, the Sustainability Appraisal work undertaken by LUC in support of the Phase 1 Consultation Document clearly identifies the ‘building blocks’ that score most highly, which the SGLP should pursue. Namely after intensifying existing urban areas – urban extensions to Bristol are the most sustainable development option and this should be recognised by SGC in the next stage of the process.</p> <p>8.8 However, we recognise that there is likely to be a ‘blend’ of all of the options because there is such a vast array of settlements across South Gloucestershire</p>	

Respondent Name	User Response: Text	Response Created
	<p>which have a range of different issues that require a different solution – there is ‘no one size fits all’ approach. As such, we consider that there must be some modest growth in the Market Towns and Rural Villages to sustain and enhance these settlements, in addition to the larger scale growth that should occur as part of urban extensions.</p> <p>8.9 We strongly disagree with the building block that proposes the provision of a new settlement within the Northern periphery of South Gloucestershire for the reasons we have set out in these representations and in previous representations to the JSP –namely that this is likely to result in significant adverse effects in terms of environmental impact as a result of an increase in commuting, it does not place residents in a location where non-car forms of transport can be maximised (which is contrary to the policies of the NPPF) and it requires a significant amount of investment from inception which has not been properly costed and the proposals viability and feasibility is therefore highly uncertain.</p>	
Spitfire Bespoke Homes Ltd	<p>Identifying potential building blocks:</p> <p>3.4. Section 5 of the consultation document sets out five potential ‘building blocks’ and ‘guiding principles’ that could shape the new growth strategy for South Gloucestershire and support the work of the SDS, these include:</p> <ul style="list-style-type: none"> • Building block 1 - existing urban areas; • Building block 2 - expanding our main urban areas through small or large urban extensions; • Building block 3 - growth around our market towns; • Building block 4 - rural villages and settlements; • Building block 5 - large scale free standing new settlements. <p>3.5. This representation fully supports the inclusion of non-strategic growth at rural settlements and villages (building block 4). Building block 4 presents an opportunity to support the planned growth of the rural areas as part of the strategic aims of the Local Plan.</p> <p>3.6. It is vital that any approach to housing growth enables and supports the long-term sustainability of rural settlements and its services as a means of ensuring these communities can continue to thrive. This is in line with the provisions of paragraph 78 of the NPPF.</p> <p>3.7. Such an approach should support appropriate levels of development in the more rural settlements and villages which offer day to day services and are closer to, or well connected to Bristol and nearby employment hubs by various sustainable transport modes, such as the village of Winterbourne. Furthermore, growth at these settlements and villages which lie outside of the Cotswolds AONB will also help to reduce pressure on the need to develop on other sites within the AONB.</p>	21 Apr 2021

Respondent Name	User Response: Text	Response Created
	<p>3.8. The benefits of delivering small-medium scale developments are now identified at paragraph 68 of the NPPF. Development of such sites can clearly have a cumulative benefit for the local area, supporting nearby services and facilities but also making a significant contribution to maintaining a rolling housing land supply 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.</p> <p>3.9. It is critical to the success of the new Local Plan to place an emphasis on delivering growth to the rural villages to ensure development in these locations is Plan-led. Previous development plan documents have failed to plan for appropriate growth in these locations with a Spatial Strategy that has generally sought to limit allocations to a small number of larger and more strategic sites in the urban fringes. This strategy has, however, not provided enough housing during the Plan period of the Core Strategy, leading to an undersupply of housing within the District placing pressure on other villages and settlements with unplanned speculative development.</p> <p>3.10. Spitfire is pleased to note that the Consultation Document acknowledges this point and that a well-rounded approach to investigating a variety of options for sustainable growth, including development at rural settlements and villages, is being considered in order to ensure it positively plans for growth.</p> <p>3.11. As above, smaller-medium sized sites (such as the land off Bristol Road, Winterbourne) can come forward much more quickly 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.</p> <p>3.12. Provision of smaller-medium sized sites also opens up the market to small and medium scale house builders. The growth in the small and medium housebuilder sector will help to balance housing delivery across the District.</p> <p>3.13. It is appreciated that the future Spatial Strategy should also include for development of land in existing urban areas and the regeneration of Brownfield land (building block 1). However, as the consultation document also acknowledges, it is evident that the likelihood of meeting all housing and employment needs in the urban areas is, more limited. Whilst some larger-scale strategic growth may also be needed to meet the needs of the District, it is our overall position that this must be planned for in tandem with the addition of small-medium sized developments within the rural settlements and villages.</p> <p>3.14. Overall, Spitfire is supportive of a Spatial Strategy that ensures a more multi faceted approach is taken to ensuring housing and employment needs are met, but with a particular focus on building block 4. This approach will help to ensure that the Council is able to maintain a robust 5YHLS but will also ensure the more rural areas of South Gloucestershire, such as Winterbourne, are able to benefit from growth that will help improve and maintain the longer-term sustainability of these settlements and encourage mixed and balanced communities in line with the requirements of the NPPF.</p> <p>Investigating the Green Belt:</p>	

Respondent Name	User Response: Text	Response Created
	<p>3.15. The preparation of the new Local Plan provides an important opportunity to consider whether changes should be made to the Green Belt. Spitfire is fully supportive of the release of sites from the Green Belt to accommodate South Gloucestershire's housing needs.</p> <p>3.16. As acknowledged within Issue 24 of the consultation document, many of South Gloucestershire's villages and rural settlements that are currently located in the Green Belt, within close proximity to existing urban areas, have higher levels of walking, cycling and effective Public Transport to key services and facilities and they should therefore be assessed alongside sites situated outside of the Green Belt.</p> <p>3.17. It is acknowledged that NPPF requires all Local Plans to demonstrate that Brownfield, urban and non-Green Belt land has been explored prior to making changes to the Green Belt. However, as we have previously highlighted in our Call for Sites submissions, it appears inevitable that land will need to be released from the Green Belt in order to accommodate the future growth needs of South Gloucestershire. South Gloucestershire has previously recognised in the preparation of its earlier Plans that in order to meet housing needs, sites for housing cannot be found completely in locations outside of the Green Belt, including through the preparation of both the South Gloucestershire Core Strategy and before this, the South West Regional Strategy.</p> <p>3.18. It is noted that when the Council has looked to review the Green Belt previously the scale of the study area within the Authority's wider assessment area did not allow for a site-specific review and given the limited binary style scoring mechanism used, the assessment was limited in its ability to identify how well individual parcels performed against each of the five purposes of the Green Belt.</p> <p>3.19. Furthermore, the stage 2 analysis focusses on the release of land to accommodate large-scale residential development (generally considered capable of delivering mixed-use residential development of 500 dwellings or more during the Plan period) only and did not review small-medium scale residential development. As part of the preparation of the former West of England JSP some areas of the Green Belt adjacent to the urban edge and within the wider countryside were assessed but again this did not consider small-medium scale development.</p> <p>3.20. We would therefore suggest that as part of the new Local Plan a more detailed Green Belt assessment of places within or adjoining Green Belt is undertaken to inform the Plan. This should include assessment at a more local level including a review of the value and potential impact of development on smaller parcels of Green Belt land within and surrounding rural places, such as the land off Bristol Road, Winterbourne. This will ensure that justifiable and defensible new Green Belt boundaries are secured for the future. We would caution that taking a more broad and indicative assessment approach again could result in poorly conceived piecemeal Green Belt release.</p> <p>Developing a growth strategy: potential guiding principles:</p>	

Respondent Name	User Response: Text	Response Created
	<p>3.21. The consultation document asks for feedback on the six potential guiding principles outlined in the document in order to help assess the suitability of the different locations to accommodate new growth.</p> <p>3.22. Spitfire is generally supportive of the guiding principles identified. In particular, it is noted that the approach to firstly evaluating all settlements based on their sustainability, access to services and facilities etc rather than whether they are located in the Green Belt, is the most appropriate approach to ensuring the success of the new Plan.</p> <p>3.23. At the same time, in regard to guiding principles 1 and 5, it is also worth noting that changes to the way we live, and work have occurred as a result of the impact of COVID-19. It is considered that this should also be recognised when assessing sustainability including an areas digital connectivity and fast Broadband access, as set out in the initial Sustainability Appraisal work that forms the evidence base to the new Local Plan. We note that Winterbourne is a village that provides access to superfast Broadband as identified in the Data and Access Profiles November 2020.</p> <p>3.24. With regard to guiding principle 2, it is further agreed that a sequential approach to development in high flood risk areas should be taken. However, it is considered there are likely to be clear opportunities to provide the required housing numbers on sites within flood zone 1, such as the land off Bristol Road, Winterbourne. It is therefore 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.</p> <p>3.25. With regard to guiding principle 4 (protection and enhancement of the function and connectivity of South Gloucestershire’s Green Infrastructure and Nature Recovery Networks), Spitfire note that the approach to considering the building blocks and places to investigate for growth of homes and jobs will be to look to protect and enhance Green Infrastructure (GI) elements and assets, whilst also improving connectivity of the emerging GI and nature recovery networks.</p> <p>3.26. Spitfire is, overall, supportive of ensuring the new Local Plan seeks to ensure protection and enhancement of important areas of GI is achieved within the Plan and recognises the range of important benefits GI can bring. However, it should also be recognised that new development can in fact, enhance existing GI. It can enable the provision of access to land that was not previously publicly accessible. It should also be acknowledged that the quality of GI is more important than its quantity should also be considered. Therefore, the assessment of potential areas for growth should not automatically exclude areas shown in the ‘Green Infrastructure and Nature Networks’ plan on page 71 of the consultation document at this stage and it should be recognised that new development provides opportunities to secure GI enhancements which should be encouraged via more detailed planning policies.</p>	
St. Modwen Developments	We agree with the five stated “building blocks” in part, as it is necessary to highlight the need to plan for a variety of different development “types” to ensure	05 Mar 2021

Respondent Name	User Response: Text	Response Created
and The Tortworth Estate	<p>needs are met where the demand is. New development should be appropriate to their location and context, and the Local Plan 2020 should incorporate several of these proposed building blocks to ensure it is based around a sound Spatial Strategy. Further reasoning is set out as follows:</p> <ul style="list-style-type: none"> - Urban consolidation is necessary to deliver development in the areas where there is greatest demand and also to capitalise on the existing infrastructure. This building block aligns with the NPPF's Brownfield first approach. - Building blocks 2, 3, 4 all serve a purpose in the appropriate context/location, but there is a danger that "bolt on" extensions end up not being truly sustainable and putting pressure on the host settlement if the necessary infrastructure improvements are not delivered in step with the population increase. If there is poor provision of new services there may be an increase in non-sustainable travel due to being poorly connected to services in the main settlement (or beyond). It is also sometimes assumed (not necessarily being the case) that the existing host settlements benefit from the provision of sustainable transport modes of travel. These buildings blocks are likely to be suitable for small sites where walking/cycling is a more realistic prospect. - Market towns generally contain a good level of services and existing infrastructure. However, similar to the above, growth around market towns and in rural areas might increase non-sustainable travel between settlements if existing sustainable connectivity is poor and improvements are not delivered alongside new development. - Large scale free standing new settlement sites have the potential to create new, sustainable neighbourhoods that co-locate homes/services/places of work and alleviate the need to direct development to settlements that may be at capacity. Such sites need to be in carefully considered locations and the LPA needs to have reassurance of delivery. <p>In the case of a new Garden Village at Buckover, it would alleviate the need to direct any further new development to the fringes of Thornbury and would provide the opportunity to create a new settlement based around sustainable design principles. It is a site that is outside the Green Belt and free of overarching constraints. The site is also in single ownership by a local legacy landowner in the Tortworth Estate, with a joint delivery partner on board with a demonstrable track record of delivery.</p>	
Stephen Hickmans	I agree to the use of developing brown field sites and upgrading existing buildings where infrastructure already exists. I have concerns this will just given 'lip service ' and then move quickly onto green belt land as was the previous spacial plans within the Coalpit Heath development	26 Jan 2021
Stephen Wells	Lots of rural villages could easily double in size. This would actually make them more viable communities.	20 Feb 2021
Steven Freke	Rural villages and Hamlets such as Kington should not be allowed to be consumed by development around Thornbury. Proposed site SG426 threatens the Hamlet, its character and sense of community.	27 Feb 2021

Respondent Name	User Response: Text	Response Created
	<p>Cycling and walking routes around our Towns, villages and Hamlets should be better protected by development exclusion zones.</p> <p>No development in defined flood zones due to the knock on impact to the surrounding environment.</p> <p>3 - Protecting the area of countryside north and north west of Thornbury is very important for many reasons, recreation, ecology, SSI, rich habitats, well being of the residents of Thornbury and surrounding area.</p> <p>6 - The area north west of Thornbury has much significance for place and character and should be protected from new house development.</p>	
Steve Seward	<p>Obviously cost and profit are the only realistic drivers for any developer. Existing Market towns and especially rural villages are populated by people who chose to invest and live there because they enjoy their environment and would not wish to be swallowed up and overpopulated by vast developments.</p> <p>Developers and councils on the other hand will always lean towards the cheaper options of expanding existing infrastructures to the detriment of established environments rather than the costly development of new settlements, however without completely disrupting peoples established lifestyles, the redevelopment of Existing Urban areas and new sympathetic settlements are the only remaining options whilst respecting existing boundaries and green belt zones</p>	13 Feb 2021
Strongvox Homes	<p>4.2 Urban Areas, which are generally home to a good level of existing services, facilities, employment opportunities and Public Transport connections, are considered to be among the most sustainable locations for development. As such, we are supportive of development within these areas which will, generally, be the most sustainable locations for new development.</p> <p>4.3 The difficulty is in anticipating a realistic quantum of development that will come forward from this source. We will comment further on any anticipated delivery from this source once this is more clearly defined in future consultations.</p> <p>4.4 Regardless, it is rightly acknowledged within the Phase 1 document and Sustainability Appraisal (SA) that this source will not be able to meet the development needs of the District on its own and other 'building blocks' will need to be utilised within the spatial distribution strategy.</p> <p>4.5 Urban Extensions are supported on the basis that the communities of the North and East Fringes already benefit from strong levels of employment, services, facilities and Public Transport connectivity and, therefore, there is good potential for development in these locations to achieve high standards of sustainability.</p> <p>4.6 For similar reasons, Market Towns are also generally considered to be sustainable locations for development, albeit their level of service and employment provision is below that of the Bristol Urban Fringes. The three Market Towns identified are Yate, Thornbury and Chipping Sodbury. Whilst we would generally support development at these locations, one needs to be mindful of both their capacity to expand further and the wider factors that influence sustainability at a macro level.</p> <p>4.7 For example, Thornbury has had significant levels of growth committed already</p>	11 May 2021

Respondent Name	User Response: Text	Response Created
	<p>at the town (c. 650 dwellings) which is expected to come forward over much of the Plan period. One may question whether there is enough latent demand to support further significant levels of growth under this Plan period, or if there needs to be a period of consolidation as existing commitments are built out.</p> <p>4.8 Turning to Chipping Sodbury, whilst it has not been subject to significant levels of growth in recent years, one would need to examine the benefits of directing development to this location against alternative options. Whilst it would have good access to Yate and reasonable Public Transport connections to the fringes of Bristol, one questions whether development here is truly best located to maximise opportunities for active/public modes of transport. For example, development at Coalpit Heath or the North West of Yate would be much better related to these key areas of the District and better placed to maximise active and Public Transport opportunities (e.g. MetroBus extension, the strategic rail network and key employment centres).</p> <p>4.9 As such, we generally only see Yate as a primary candidate in terms of being capable of delivering further large-scale growth within the most optimal sustainable strategy.</p> <p>4.10 The Rural Villages building block includes a number of settlements of varying size, significance and unique circumstances that will influence what level of development could come forward at them. Some will be capable of accommodating significant levels of growth, whilst others will only be able to support small scale growth.</p> <p>4.11 New Settlements can also make a valuable contribution to housing supply where there has been a sound approach to securing their delivery in a timely manner. Excellent examples of this would include the delivery of Cranbrook in East Devon and Northstowe in South Cambridge.</p> <p>4.12 As acknowledged within the Consultation Document, careful consideration needs to be given to any identified opportunities. A significant level of reassurance will need to be provided that the needs of the new community will be met and that they will come forward in a reasonable timeframe.</p> <p>4.13 New physical infrastructure (generally transport related) is often required to facilitate their delivery. The cost of this can either be prohibitive, affect viability or require external funding sources to secure their delivery. The latter is often reliant on being obtained via specific bid cycles. This can, in turn, affect the timely delivery of such new settlements. This will need to be borne in mind, especially given the shorter Plan period compared with the JSP.</p> <p>4.14 Once a set of sufficiently sustainable locations have been identified, deliverability should then be the key consideration in deciding which of these should be pursued. There are significant consequences associated with the failure of strategic sites to come forward (exacerbation of affordability issues, stymied economic growth, delays to key physical and social infrastructure etc). This is something that the Council should actively look to avoid.</p>	

Respondent Name	User Response: Text	Response Created
Sue Green - Home Builders Federation	<p>The Council has identified 5 potential Building Blocks for developing its future growth strategy. These building blocks comprise (1) Optimising densities & efficient use of land in existing Urban Areas (Bristol North & East Fringe, Yate and Thornbury), (2) Expansion of Main Urban Areas by small / large urban extensions into locations beyond the communities of the North and East Fringe, (3) Growth beyond the existing settlement boundaries of Market Towns at Yate, Chipping Sodbury and Thornbury, (4) The potential for an appropriate level of sustainable growth in and around the wide range of rural villages and settlements and (5) Large scale free standing new settlements.</p> <p>The Council's growth strategy should be consistent with the spatial strategy of the WoE SDS and meet the development requirements of the WoE SDS. The Council's growth strategy should also meet the housing needs of South Gloucestershire's urban and rural communities.</p> <p>There are disadvantages in pursuing any Building Block in isolation.</p> <p>It is agreed that the Council should make as much use as possible of Previously Developed Land (PDL) in existing urban areas (Building Block 1) as set out in 2019 NPPF (para 117). However, the Council should avoid "town cramming", which would provide insufficient variety in house typologies to create balanced communities with the right types of new homes to meet the housing needs of different groups. There will be a limited capacity for higher densities and more taller buildings, which will only be appropriate in certain locations. A blanket approach to the intensification of housing densities everywhere would be inappropriate as a range of differing densities will be needed to ensure development is in keeping with the character of the surrounding area. The setting of residential density standards should be undertaken in accordance with the 2019 NPPF (para 123), whereby in the circumstances of an existing or anticipated shortage of land for meeting identified housing needs then a minimum net density in suitable locations such as town centres and those benefiting from good public transport connections may be appropriate. The future deliverability of intensely developed residential schemes will also be dependent on the viability of PDL (see HBF answer to Q18 below) and market demand for high density urban living post Covid-19. Building Block (1) alone is unlikely to meet all development needs due to the restricted capacity of the existing urban area and insufficient availability of brownfield sites. The Council should also consider competing demands from employment and residential uses in the existing urban areas.</p> <p>Under Building Block (2) if development sites are large scale, there may be long lead in times for the commencement of on-site development and build up to optimum delivery rates. Long lead in times are also associated with large scale free standing new settlements proposed in Building Block (5). Such new settlements should be considered over a longer time frame (up to 30 years), which is beyond the proposed plan period of the Local Plan and SDS. To ensure a continuous housing land supply (HLS) in the short to medium term, such strategic sites should be complimented with smaller non-strategic sites at Market Towns and Rural Villages & Settlements.</p>	05 Mar 2021

Respondent Name	User Response: Text	Response Created
	<p>Building Blocks (3) and (4) will support local communities living in Market Towns and rural villages & settlements. As set out in the 2019 NPPF “to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services” (para 78).</p> <p>In summary, the growth strategy for South Gloucestershire is likely to be a combination of more than one Building Block therefore all Building Blocks should be considered as part of a combination for developing a future growth strategy. The promotion of an effective use of land set out in the 2019 NPPF is not a return to a brownfield first policy approach of the past. The Council’s growth strategy should be a balanced rather than sequential approach. Housing delivery is optimised by the widest possible range of housing site sizes and market locations, which provides suitable land buying opportunities for small, medium and large housebuilding companies. The widest mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides competition in the land market. A diversified portfolio of housing sites also offers the widest possible range of products to households to access different types of dwellings to meet their housing needs.</p>	
Sue Hope	Very concerned about the development of a New Settlement - it would lead to sprawled development in the countryside.	26 Feb 2021
Sue Simmons - Westerleigh Parish Council	<p>Page 62 talks about using five building blocks to build towards the (current) target of 1,412 new homes across South Glos per year. It says that the primary building block should be Brownfield development in urban areas (as per the current NPPF) and then sets out building blocks 2 - 5 which all involve some form of rural or Green Belt development.</p> <p>By numbering the primary building block number one and then setting out four more it’s easy to interpret this as building blocks two to five being ordered in order of preference. If they were this would be good for our Parish’s Green Belt because “rural villages and settlements” doesn’t come until building block 4.</p> <p>The document needs to be clearer and make the point that once urban development possibilities are exhausted (Building Block 1), the remaining building blocks are NOT in order of preference and that a mixture of building blocks will be used.</p> <p>It should clearly outline the principles for how these blocks would be ordered or prioritised.</p> <p>Large scale development of rural settlements should never be acceptable and there should be principles that protect this such as limited numbers Rural Exception Schemes, regular Housing Needs Surveys, and Local Connections Schemes that do what they say on the tin.</p>	23 Feb 2021
Susan Smith	Do in filling on brownfield sites before the Green Belt is considered for development	16 Feb 2021

Respondent Name	User Response: Text	Response Created
Swanmoor Stoke Ltd	<p>Please see Section 7 of the accompanying Representation.</p> <p>SSL supports a fresh approach to the formulation of a Spatial Strategy to help it sustain the test of time and deliver sustainable development. The building blocks set out are sensible and, in practice, the Local Plan will need to include a blend of these to deliver a large housing and economic development requirement. A review of the Green Belt is also an important component of this to ensure that the Spatial Strategy can deliver a sustainable pattern of development moving forward.</p> <p>It is sensible to start with considering how development can be accommodated within the urban areas, but it is recognised that this needs to be balanced with the potential impacts on amenity and the ability to meet development standards and a large number and mix of housing types in existing built up areas on Brownfield sites. It is considered that the Council have adopted a sensible approach to this and are realistic that the assessment of urban capacity and potential around smaller settlements, which will also have a role to play in meeting needs will likely lead to further greenfield release.</p> <p>7. The Strategy – Where will new development go?</p> <p>7.1 SSL support the view expressed that a new strategy is required as part of the Local Plan 2020 in order to identify areas to locate a large number of new homes, space for jobs, supporting services, facilities and infrastructure, rather than extending or re-working the existing strategy in the Core Strategy (Policy CS5), which may not last the test of time over the next fifteen to twenty years and also does not deal with the future growth of the Severnside economic area in a holistic manner alongside infrastructure delivery.</p> <p>7.2 It is sensible to start with considering how development can be accommodated within the urban areas, but it is recognised that this needs to be balanced with the potential impacts on amenity and the ability to meet development standards and a large number and mix of housing types in existing built up areas on Brownfield sites. It is considered that the Council have adopted a sensible approach to this and are realistic that the assessment of urban capacity and potential around smaller settlements, which will also have a role to play in meeting needs will likely lead to further greenfield release.</p>	06 Apr 2021
Taylor Wimpey UK Ltd - Land at Mangotsfield	<p>SECTION 5 – STRATEGY - WHERE WILL NEW DEVELOPMENT GO?</p> <p>Building blocks:</p> <p>Five potential building blocks are set out that are proposed as the foundations to the development strategy, each block represents a potential approach to identifying locations for growth. The first of which is focusing development in existing urban areas. This approach is not unreasonable and is in line with national policy on Brownfield land. The aim to maximise density, via the efficient use of Brownfield (previously developed) land, is welcomed, although (as acknowledged in the consultation document) it will not be possible to meet all the development needs in this way. At any point in time Brownfield land is a finite resource and Brownfield sites are often slower to deliver than greenfield options. The Council’s last full</p>	20 Apr 2021

Respondent Name	User Response: Text	Response Created
	<p>AMR (2019) sets out that between 2013 - 2019 an average of just 45% (range of 55 - 33% over 6 years) of homes delivered were on Brownfield sites. In addition, while higher densities are described as preferable these may not be deliverable (given the various constraints which are unique to each site) or desirable to local communities in specific parts of South Gloucestershire. Viability testing of this source of supply will be critical for the future stages of the Plan, so that it is clear that any assumed levels of capacity are realistic in terms of both deliverability, and the market appetite for delivery. The Council will need to take particular care to ensure that trends in the housing market arising from the pandemic are reflected in the shorter and longer term.</p> <p>As the consultation document explains, the level of growth to be accommodated cannot be met through the first 'building block' (existing urban areas). It is clear that a combination of approaches is needed that includes urban extensions, growth at market towns, rural villages and settlements and also new settlements.</p> <p>Need to review the Green Belt:</p> <p>As acknowledged in the consultation document, the release of Green Belt land can sometimes be the most sustainable option, and that which best accords with other policy aspirations such as high levels of walking, cycling and access to services and facilities. It is appropriate to review the Green Belt boundaries as part of preparing a new Plan and therefore there is now an opportunity to review these boundaries in line with the purposes of the Green Belt and to consider the balance between an individual site's contribution to the Green Belt Purposes and the need to accommodate growth, to deliver both housing and employment needs, in the most sustainable locations (generating the required exceptional circumstances to justify changes to Green Belt boundaries). Both Green Belt and non-Green Belt development locations need to be considered in the emerging Plan as site options in a range of locations will be required in order to meet the needs for development over the Plan period, and as some of the most sustainable development options will involve the use of existing Green Belt land.</p>	
Taylor Wimpey UK Ltd - Land at Vilner Farm	<p>Five potential building blocks are set out that are proposed as the foundations to the development strategy, each block represents a potential approach to identifying locations for growth. The first of which is focusing development in existing urban areas. This approach is not unreasonable and is in line with national policy on Brownfield land. The aim to maximise density, via the efficient use of Brownfield (previously developed) land, is understood, although (as acknowledged in the consultation document) it will not be possible to meet all the development needs in this way, and it is important to have regard to limitations presented by this form of development and the competing demands that will exist for other uses (such as employment provision) within existing urban areas. At any point in time Brownfield land is a finite resource and Brownfield sites are often slower to deliver than greenfield options. The Council's last full AMR (2019) sets out that between 2013 - 2019 an average of just 45% (range of 55 - 33% over 6 years) of homes delivered were on Brownfield sites. In addition, while higher densities are described as preferable these may not be deliverable (given the various constraints which are unique to each site) or desirable to local communities in specific parts of South Gloucestershire. Viability testing of this source of supply will be critical for</p>	20 Apr 2021

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	<p>the future stages of the Plan, so that it is clear that any assumed levels of capacity are realistic in terms of both deliverability, and the market appetite for delivery. The Council will need to take particular care to ensure that trends in the housing market arising from the pandemic are reflected in the shorter and longer term.</p> <p>As the consultation document explains, the level of growth to be accommodated cannot be met through the first 'building block' (existing urban areas). It is clear that consideration of a combination of approaches is needed that includes urban extensions, growth at market towns, rural villages and settlements and also new settlements.</p> <p>As part of the strategy then we consider that a key (but not exclusive) area of focus should be on providing sustainable growth by expanding existing urban areas, and other towns (building blocks 2 and 3). These approaches are able to provide attractive new development in locations that are able to access existing services and facilities, as well as provide new infrastructure which benefits new and existing communities alike, and will be well placed to take advantage of active travel modes and access to Public Transport (both existing and new provision).</p>	
Terry Chamberlain and Alan Jobbins	<p>4.1 The building blocks identified broadly form the principal locations that one would expect to see a Local Plan utilise to deliver the development needs of the District. Typically, it will be combination of most, if not all of these, that would help to secure the development needs of a District and achieve an appropriate balance between sustainability and deliverability.</p> <p>4.2 Urban Areas, which are generally home to a good level of existing services, facilities, employment opportunities and Public Transport connections, are considered to be among the most sustainable locations for development. As such, we are supportive of development within these areas which will, generally, be the most sustainable locations for new development.</p> <p>4.3 The difficulty is in anticipating a realistic quantum of development that will come forward from this source. We will comment further on any anticipated delivery from this source once this is more clearly defined in future consultations.</p> <p>4.4 Regardless, it is rightly acknowledged within the Phase 1 document and Sustainability Appraisal (SA) that this source will not be able to meet the development needs of the District on its own and other 'building blocks' will need to be utilised within the spatial distribution strategy.</p> <p>4.5 Urban Extensions are supported on the basis that the communities of the North and East fringes already benefit from strong levels of employment, services, facilities and Public Transport connectivity and, therefore, there is good potential for development in these locations to achieve high standards of sustainability.</p> <p>4.6 The Bristol North Fringe in particular boasts a wide range of services, facilities and employment opportunities with excellent Public Transport connections between them. Its importance as an employment hub for South Gloucestershire is also highlighted on page 47 of the infographic with significant levels of in commuting to the area, relative to out commuting (which is generally toward</p>	05 May 2021

Respondent Name	User Response: Text	Response Created
	<p>Central Bristol).</p> <p>4.7 Given its importance and the limited scope for further growth within the confines of the M4/M5 boundary, careful consideration needs to be given in respect of how development can be sustainably delivered in order to take advantage of the service and employment provision within it. An appropriate level of growth at Hambrook would be well related to the Bristol Urban Fringe and could complement any strategic levels of growth which come forward elsewhere (e.g. along the A38 corridor).</p> <p>4.8 For similar reasons, Market Towns are also generally considered to be sustainable locations for development, albeit their level of service and employment provision is below that of the Bristol Urban Fringes. The three Market Towns identified are Yate, Thornbury and Chipping Sodbury. Whilst we would generally support development at these locations, one needs to be mindful of both their capacity to expand further and the wider factors that influence sustainability at a macro level.</p> <p>4.9 For example, Thornbury has had significant levels of growth committed already at the town (c. 650 dwellings) which is expected to come forward over much of the Plan period. One may question whether there is enough latent demand to support further significant levels of growth under this Plan period, or if there needs to be a period of consolidation as existing commitments are built out.</p> <p>4.10 Turning to Chipping Sodbury, whilst it has not been subject to significant levels of growth in recent years, one would need to examine the benefits of directing development to this location against alternative options. Whilst it would have good access to Yate and reasonable Public Transport connections to the fringes of Bristol, one questions whether development here is truly best located to maximise opportunities for active/public modes of transport. For example, development at Coalpit Heath or the North West of Yate would be much better related to these key areas of the District and better placed to maximise active and Public Transport opportunities (e.g. MetroBus extension, the strategic rail network and key employment centres).</p> <p>4.11 As such, we generally only see Yate as a primary candidate in terms of being capable of delivering further large-scale growth within the most optimal sustainable strategy.</p> <p>4.12 The Rural Villages building block includes a number of settlements of varying size, significance and unique circumstances that will influence what level of development could come forward at them.</p> <p>4.13 For example, Coalpit Heath/Frampton Cotterell/Winterbourne are larger villages in and of themselves which all scored well in sustainability terms within the Rural Settlements Topic Paper[3]. In reality, the three settlements effectively function as a single entity with a range of services, facilities and employment opportunities across complementing each other to support the majority of the needs of their residents. These settlements could, therefore, be capable of accommodating</p>	

Respondent Name	User Response: Text	Response Created
	<p>significant levels of growth.</p> <p>4.14 As we have touched on above, Hambrook is also a highly sustainable settlement by virtue of its excellent cycle and Public Transport connections to the Bristol Urban fringes/Central Bristol. This is reflected in its categorisation within the Rural Settlements Topic Paper alongside Coalpit Heath, Frampton Cotterell and others in the 2nd tier, below only Yate, Thornbury and Winterbourne. This makes it an excellent candidate for growth in the New Local Plan.</p> <p>4.15 New Settlements can also make a valuable contribution to housing supply where there has been a sound approach to securing their delivery in a timely manner. Excellent examples of this would include the delivery of Cranbrook in East Devon and Northstowe in South Cambridge.</p> <p>4.16 As acknowledged within the Consultation Document, careful consideration needs to be given to any identified opportunities. A significant level of reassurance will need to be provided that the needs of the new community will be met and that they will come forward in a reasonable timeframe.</p> <p>4.17 New physical infrastructure (generally transport related) is often required to facilitate their delivery. The cost of this can either be prohibitive, affect viability or require external funding sources to secure their delivery. The latter is often reliant on being obtained via specific bid cycles. This can, in turn, affect the timely delivery of such new settlements. This will need to be borne in mind, especially given the shorter Plan period compared with the JSP.</p> <p>[3] South Gloucestershire Local Plan Rural Settlements and Villages 2015 Topic Paper (November 2015).</p> <p>4.18 Once a set of sufficiently sustainable locations have been identified, deliverability should then be the key consideration in deciding which of these should be pursued. There are significant consequences associated with the failure of strategic sites to come forward (exacerbation of affordability issues, stymied economic growth, delays to key physical and social infrastructure etc). This is something that the Council should actively look to avoid.</p>	
The Badminton Estate	<p>Please see accompanying representation.</p> <p>4.1. The consultation document sets out five building blocks where development could take place:</p> <ol style="list-style-type: none"> 1. Building Block 1: Existing urban areas; 2. Building Block 2: Expanding our main urban areas through small or large urban extensions; 3. Building Block 3: Growth around our market towns; 4. Building Block 4: Rural villages and settlements; and 	04 May 2021

Respondent Name	User Response: Text	Response Created
	<p>5. Building Block 5: Large scale free standing new settlements.</p> <p>4.2. Whilst the Estate are supportive of all development growth contained within those building blocks, they are particularly supportive of Building Block 4 for reasons set out above and on the proviso that this helps enhance the sustainability of the host settlement.</p>	
Theodore Butt Philip - South Gloucestershire Liberal Democrat Council Group	These seem to be reasonable categorisations of the types of areas where development could take place, though that does not imply agreement with the proposed distribution of new development across them. As ever we believe there is an over reliance on areas that have already taken significant development, for example Yate and Thornbury.	12 Mar 2021
The Tortworth Estate	<p>We agree with the five stated “building blocks” in part, as it is necessary to highlight the need to plan for a variety of different development “types” to ensure needs are met where the demand is. New development should be appropriate to their location and context, and the Local Plan 2020 should incorporate several of these proposed building blocks to ensure it is based around a sound Spatial Strategy and that a consistent rate of delivery is maintained.</p> <p>We support small scale growth in rural locations (building block 4), where appropriate and sustainable, to help enhance the vitality of rural communities the rural economy in general, as per paragraph 78 of the NPPF. We understand enhancing rural vitality is a priority of the current Administration and this should inform the location of new development in the District, however, as stated above, this should be in combination with a variety of other development sizes and types.</p> <p>The Tortworth Estate has a number of land interests in rural villages in the North of the District that are considered to be appropriate for small-scale mixed-use residential/employment/community uses, and could therefore play an important role in facilitating sustainable rural growth. For example, the Estate owns several potential development sites at Cromhall. The allocation of these sites for residential/employment/community uses could allow growth to be planned for and managed over time to meet demand, delivering sustainable development and also allowing infrastructure to be delivered in parallel to support the increased population.</p> <p>All of the Estate’s proposed sites lie outside the Green Belt which makes them an attractive propositions for growth, given they are not affected by this significant development constraint.</p> <p>Please refer to the Call For Sites Submissions for further details of the individual site interests.</p>	05 Mar 2021
Tom Cotton - Road Haulage Association	No comment.	01 Mar 2021
Tony Kerr	Is it expected that central government will allocate a number of houses to be achieved in the plan?	17 Feb 2021

Respondent Name	User Response: Text	Response Created
	What scope is there to balance demand and allocation across the 4 unitary authorities of CUBA?	
Top To Bottom Ltd and Hanham Community Trust	<p>See attached representations.</p> <p>As previously mentioned in this letter, our client is supportive of the urban living approach more generally and considers that efficient use should be made of all previously developed land in these areas (Building Block 1:Existing Urban Areas). The risks of over-allocating development on this type of land have been considered earlier in this letter, and thus, it has also been identified that a mix of green field sites should be selected as part of the Council’s spatial development strategy.</p> <p>As such, the allocation of sustainable housing sites on the edge of urban settlements close to existing infrastructure is wholly supported (Building Block 2: expanding our main urban areas through small or large urban extensions). This would generally result in the loss of Green Belt land as most of the urban areas at the North and Eastern Fringes of Bristol within the South Gloucestershire boundary are tightly constrained by Green Belt policy. Issue no. 44 (Green Belt) identifies that over 40% of South Gloucestershire is currently covered by Green Belt protection. Many of the surrounding sustainable settlements, including those at the urban edges including such as Longwell Green are surrounded by Green Belt which limits the settlement’s planned growth. It is necessary for a robust Spatial Strategy and housing delivery efficiency to deliver housing at both urban and sustainable urban fringe/rural locations.</p> <p>Rural Settlements have a key role to play in delivering a sustainable Spatial Strategy (Building Block 4: Rural Villages and settlements), they should be investigated for their potential to provide a mix of small, medium or large scale growth depending on the supporting infrastructure and wider settlement sustainability principles. Key Issue no. 26 acknowledges that the Core Strategy allowed for infilling within existing village boundaries but did not allocate any sites for planned growth in rural settlements, or any non-strategic growth in urban fringe settlements. As such, many of these locations have seen very limited housing growth in the period since 2006.</p> <p>The first guiding principle relates to the location of new homes, jobs or settlements and sets out to consider the proximity of potential locations to key services, facilities and sustainable transport options. The Green Belt covers a significant proportion of the District, including many highly accessible locations and settlements as recognised in key Issue no. 24 (Green Belt). It is therefore a major policy barrier to the achievement of sustainable development and a Carbon neutral green recovery. It is imperative that a thorough and robust assessment of the Green Belt is undertaken to ensure this guiding principle is achieved and that this should include assessing for large, medium and small scale growth options across the District’s settlements.</p> <p>The Local Plan 2020 is intended to accord with the emerging SDS that is being prepared by WECA, along with North Somerset which is understood to be co-operating. The Local Plan should therefore acknowledge cross-boundary issues in developing its Spatial Strategy in recognition of the fact that the City of Bristol is</p>	11 May 2021

Respondent Name	User Response: Text	Response Created
	<p>the economic driving force of the West of England. Bristol also has the highest indicative Local Housing Need in the sub-region and there is very high demand for housing within or near to the city. The most sustainable locations in South Gloucestershire are often urban fringe locations, or settlements that benefit from proximity and/or good transport links to the Bristol urban area.</p> <p>In accordance with Paragraph 32 of the NPPF, this new Local Plan should deliver its Spatial Strategy in accordance with the most sustainable development locations identified in through the preparation of a Sustainability Appraisal. This will ensure that settlements are tested for their levels if economic, environmental and social sustainability and development is allocated in the right places.</p> <p>Our client agrees that a mixture of the building blocks for a development strategy will likely be required. The sites identified at Hanham and Longwell will assist with this along with a number of identified issues and priorities for the Local Plan. It is also agrees that a review of the Green Belt is required. The retention of the Green Belt means that, apart from urban intensification, the focus of development is further away from the Bristol urban area, which would be a less effective way of meeting housing and affordable housing needs. Also, there is clear evidence of Green Belt's protection's adverse consequences at the expense of all other objectives and priorities, including environmental protection, Climate Change, delivering a sufficient supply of homes, among others.</p>	
Trevor James	<p>The Climate Emergency is now the most important urgent factor that we have to contend with, for us and for future generations. To develop further onto green fields and spaces must no longer be considered, as we are taking away valuable carbon lock-up environments. Development should now be focussed on reusing redundant urban buildings and land, regenerating brownfield sites and 'above shop' accommodation in our high streets, which will help those high streets come back to life. The UK Design Council has strong views and policies on creating sustainable living (on their website) and are championing such an approach.</p>	26 Feb 2021
Tristan Clark - South Gloucestershire Council	<p>The building blocks, on their own, are intuitive but the Local Plan needs stronger ordering/sequencing principles to accompany them (e.g. Brownfield sites outside of the Green Belt should be considered for large scale development first, followed by brownfield sites that are washed over by Green Belt, then by greenfield sites outside of the Green Belt, before ultimately considering greenfield sites within the Green Belt). The guiding principles in the next section are too vaguely worded and will be liable to manipulation. There is nothing to prevent officers making drastic revisions to the Green Belt, via building blocks 4 & 5, despite being able to meet more of the housing need through the other building blocks. One of principle reasons that the Joint Spatial Plan was an abject failure is that Strategic Development Locations within the Green Belt (like Coalpit Heath) were proposed even though there were still contingency SDLs located outside of the Green Belt. The Planning Inspectors were correct to point out that it would appear to the public as if the four authorities had predetermined the SDL locations and then adjusted the selection criteria and evidence base to support their predetermined preferences.</p>	01 Mar 2021
Trystan Mabbitt - Hanson UK - Heidelberg	<p>The numbering of the various Building Blocks (1 - 5) implies an inherent misplaced sustainability/acceptability ranking. It is noted that Building Block 2 locations lie largely within the Green Belt. In principle, it is argued that most if not all such</p>	18 Mar 2021

Respondent Name	User Response: Text	Response Created
Cement Group	<p>locations would likely be more harmful to the environment than appropriately and sustainably located Building Block 3 growth areas around the market towns, such as Chipping Sodbury.</p> <p>Careful assessment and comparison of the relative merits of different Building Block sites should therefore be undertaken in proposing the distribution of the West of England Spatial Development Strategy's housing and employment apportionments and ultimately deciding which sites to allocate.</p>	
Victoria Bailey - Oldbury on Severn Parish Council	<p>This approach seems logical but will become clearer in phase 2 but:-</p> <p>"Rural villages" are fine in concept but what forever appears to be omitted is an over-reliance on existing infrastructure which then necessitates the need for travel, invariably by car. Public Transport between villages is poor to non-existent and the capacity of pre-existing local infrastructure including Doctors, Dentists, Schools, recreation, supermarket facilities etc have all been stretched to breaking point. We would request that until the results of the 2021 Census have been assessed and the requirements for infrastructure to support the increased population has been put into place that further development is held in abeyance. Residential development should not be created until the essential infrastructure is in place and should be at least funded by the developers via the CIL.</p>	24 Mar 2021
Vistry Group	Please refer to enclosed representations.	06 May 2021
Waddeton Park Ltd	<p>The Council has identified a number of potential Building Blocks for providing for future growth. However, there will be disadvantages in pursuing any one of them in isolation.</p> <p>As noted in the response to Q5 above, it is agreed that the Council should make as much use as possible of previously developed land in existing urban areas. However, the Council should avoid "town cramming," which would not result in balanced communities with the right types of new homes to meet the housing needs of different groups. There will be a limited and finite capacity for higher densities, which in any case will only be appropriate in certain locations.</p> <p>It does seem clear that there will certainly need to be an emphasis on the edge of Bristol, if objectives relating to reducing travel and cutting emissions are to be met. However, there will be the additional need to spread housing around the LPA area in a wider choice of sustainable locations given the overall requirement that will need to be met.</p> <p>A dispersal strategy is required with some new development directed to those towns and villages with good access to services and Public Transport links, and those where existing facilities could be enhanced through an appropriate scale of development.</p> <p>Building Block (1) alone is unlikely to meet all development needs due to the restricted capacity of the existing urban area and insufficient availability of Brownfield sites. It is also important that employment needs remain provided for.</p>	11 Mar 2021

Respondent Name	User Response: Text	Response Created
	<p>Under Building Block (2) large scale sites invariably have long lead in times and a staggered build up to optimum delivery rates. Such issues are also associated with large scale free standing new settlements, as proposed in Building Block (5).</p> <p>Experience clearly demonstrates that relying on just a few large sites to meet housing requirements is not the appropriate way to proceed. Such sites are generally extremely difficult to bring forward and delivery often becomes extended well beyond the timescales actually required.</p> <p>Building Blocks (3) and (4) will support local communities living in Market Towns and rural villages & settlements. As set out in the 2019 NPPF “to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services” (para 78).</p> <p>The growth strategy for South Gloucestershire is likely to have to be a combination of more than one Building Block. The Council needs to ensure that as the Local Plan process moves forward, the difficult issues and questions are asked and addressed in order that the needs of its existing and future population are positively planned for.</p> <p>Without grappling with such issues now, the current patterns of activity that fuel adverse Climate Change impacts will continue to prevail. Delivering on zero-Carbon ambitions, delivering the range of housing tenures, sizes and forms, delivering new transport infrastructure and addressing the decline of town centres all require housing needs to be fully met in a sustainable manner.</p>	
Waddeton Park Ltd - Land at Hicks Common Road	<p>25. The 5 categories identify all the different spatial approaches for accommodating development. As such they represent a consistent approach with National Planning Policy. However, there is concern that categories 1 - 5 could represent some form of sequential approach which would be inappropriate. Given the character and structure of settlements in South Gloucestershire it is not always going to be the case that the Urban Lifestyle Living will generate the most sustainable form of development or that it will represent the best response to Climate Change when travel patterns are fully considered. Further consideration should be given to development proposals, that are sustainably located to meet several National and Regional objectives. Appendix 2 provides a technical assessment of why this is the case in respect of Winterbourne when compared to the most sustainable settlements outside the Green Belt.</p> <p>26. It is inevitable that a proportion of residents from across South Gloucestershire will travel to a range of destinations within Greater Bristol and as such places like Thornbury, Chipping Sodbury and Yate, which form part of the Potential Urban Lifestyle locations will generate longer car borne trips than other settlements close to Bristol. Evidence set out in Appendix 2 demonstrates the very significant proportion of out commuting to Greater Bristol for employment purposes from all the settlements across South Gloucestershire. The Plan, therefore, needs to recognise the impact of Bristol as a major employment hub on travel patterns and consequentially on Carbon emissions and Climate Change. SGC should therefore</p>	17 May 2021

Respondent Name	User Response: Text	Response Created
	<p>place greater weight on travel data to inform the location of new development to reduce journey trips and Carbon emissions rather than simply seeking to balance housing and employment at individual settlements.</p> <p>27. Settlements around the Bristol Fringe, like Winterbourne which have been overlooked for development purposes due to Green Belt, would support a material and positive effect on Climate Change by encouraging low Carbon travel and shorter trips, particularly for employment purposes.</p> <p>28. It is also noted that the Potential Urban Lifestyle locations are existing urban areas and whilst sites like Filton Airfield may yield greater development potential through higher densities, places like Yate, Thornbury and the East Fringe locations have grown through greenfield urban extensions. The ability for these places to intensify is therefore likely to have been largely exhausted therefore should not be overestimated at the expense of delivering much needed homes in the right locations to address Climate Change. It should also be noted that the Urban Lifestyle approach will compete with retaining employment land and the pressure to release it for housing. This is something that the emerging Plan should consider and balance appropriately.</p> <p>29. Regarding Buildings Blocks 2, 3 and 4, a one size fits all approach is not going to deliver sustainable development or indeed, address Climate Change. Whilst the North East Fringe (Building Block 2) is a logical location to support reduced commuting into Bristol, there has been continual and rapid expansion over recent years. There are equally sustainable locations for planned new growth such as the nearby villages like Winterbourne.</p> <p>30. In our view, Building Block 3 has limitations regarding sustainable development. Whilst settlements like Thornbury, Chipping Sodbury and Yate all have a range of local services and facilities and could support indigenous growth, a Plan which addresses the Council's declared Climate Change Emergency will need to provide homes closest to where jobs are and recognise the influence that Bristol has in this regard. For example, Appendix 2 shows that due to the spread of employment destinations across Greater Bristol, a reliance on rail connections to improve the sustainability of commuting will only account for a very small proportion of travel from these settlements (currently 2%). Even with a doubling or tripling of this, it still represents a fraction of journeys travelled. As such, the approach to spatial planning should focus on shorter journey-to-work distances and encourage more flexible, Carbon efficient travel modes. This type of strategy will rely upon using the strong network of dedicated cycle routes to avoid wherever possible, the Carbon impact of major new engineering infrastructure. It will also rely on good quality bus routes and connections to the existing MetroBus network.</p> <p>31. Waddeton Park supports the principles of Building Block 4. However, SGC is urged to re-look at this during the early stages of Plan preparation and specifically the impacts of reducing community distances/changing travel modes on the Climate Change Emergency. Moreover, a substantial response to the Climate Change Emergency represents an exceptional circumstance to review Green Belt boundaries at those sustainable settlements like Winterbourne and the</p>	

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	<p>encouragement of at least medium-scale growth as part of this Plan's site allocation process.</p> <p>32. Building Block 5 (free standing new settlement) is a more complex proposition in terms of addressing Climate Change and sustainability insofar as it relies upon building sustainability from scratch and the Carbon impact of additional infrastructure. For example, in the now abandoned JSP, land at Buckover was identified as a potential new settlement and whilst the Hearings did not take place, there was widespread concern about deliverability, sustainability and viability for this draft allocation. Conversely larger villages on the edge of Bristol can deliver the same quality and sustainability levels whilst being much closer to the employment base and facilities of the City. That proximity enables cycling and e-cycling to be utilised to access major employment areas on dedicated cycle routes into and around Greater Bristol. The proximity of Winterbourne to Greater Bristol will demonstrably reduce commuting distances and thus greatly support the response to Climate Change. Similarly, utilising Building Block 4 also enables existing services and facilities at settlements to be used in the short-term to underpin the sustainability of growth and in return growth will provide further enhancements to services and facilities.</p> <p>33. In summary, given the spatial structure of South Gloucestershire, the position of the market towns to the North and the influence on employment commuting patterns of Greater Bristol to the South, more emphasis should be placed on exploring Building Block 4 to deliver a greater proportion of future growth.</p>	
William Beloe	<p>I am predominantly concerned about & would like to register my opposition to the proposed new development at Quarry farm / Park Mill Farm sites between Thornbury & Kington. I live at Fewster Farm in Kington, a grade 2* listed farmhouse which dates back to 1380 & is as such of significant historical interest. Besides the obvious worry of becoming engulfed by the ever spreading urban sprawl of Thornbury, the area is rife with wonderful wildlife which no doubt would be decimated should this development go ahead. On our property alone we have spotted badgers, fox, bats, hedgehogs several varieties of newt (including greater crested!) several types of woodpecker, buzzards, grass snakes & we even found a tiny lizard / gecko of some sort!</p> <p>The proposed site is also crossed by several well used public footpaths which are a great asset to everyone in Thornbury & surrounding area where people can escape the built up areas & enjoy the countryside / nature.</p> <p>The road outside my house (Kington Lane) often floods during any sustained period of rain as the local stream pool brook is barely able to cope with the quantity of water as it is. Should the area above be covered in houses / asphalt no doubt this would get significantly worse & could result in the flooding of several local properties from time to time.</p> <p>The local lanes are very narrow & winding, in several places is not safe for two cars to pass in opposite directions & are already rather busy, I don't believe they could cope safely with the increase in traffic that would be caused by a new development.</p>	28 Feb 2021
William Howell	New settlements.	23 Feb 2021
William Sharpe-	Do not agree to develop new housing at the land to the west of Thornbury Castle	28 Feb

Respondent Name	User Response: Text	Response Created
Neal	listed as land at Park Mill Farm and Quarry Farm. It will ruin our local community in Kington and damage Thornbury as a historic market town. The area is currently made up of historic listed buildings and beautiful countryside. Such a development would be a disgrace to our history and way of life and should be avoided at all cost.	2021

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