

Report on Questionnaire Answers

Questionnaire: Local Plan 2020

Question: [26: Appendix 2: Draft policies: Creating well-designed places] Do...

Respondent Name	User Response: Text	Response Created
Alan Jones - Hanham & District Greenbelt Conservation Society	Who will judge the 'design' standard of a development?? There are plenty of highly regarded developments mentioned in the 'Planning for the Future' planning white paper consultation and there, the driving element was 'Beautiful homes'. Is the adoption of the 'creation of well-designed' places a watering down of the initial aspiration. As demonstrated in response to Issue 15 - currently poorly designed developments such as the one at Cribbs Causeway, are still currently receiving SGC planning approval - a major review is obviously needed to bridge these current standards and the heady aspirations of the document!	26 Feb 2021
Ali Adams - Siston Parish Council	The lose of local foot paths in new developments is awful. Families struggle to walk round new housing areas, dodging vehicles all the time as the pathways have been removed in favour of more development on the sites. An extra few houses can be crammed in it the footpaths are removed.....	24 Feb 2021
Andrew Shore	Not sure I fully understand the policy approach Too much emphasis on building density would be wrong. Need open spaces, greenery, and architectural design is important too	01 Mar 2021
Angela Chapman	Well designed spaces to aid the local public and visitors is important to draw people to use local facilities. Adequate seating, pleasant surroundings accessible to all age groups.	23 Feb 2021
Angela Crabtree	Please see the Trapp'd Response. (Thornbury Residents Against Poorly Planned Development)	28 Feb 2021
Angie Carroll - Parish Council	Do as you say not what seems to happen and developers call the shots	16 Feb 2021
Ann Fray	New proposed developments seem to be going against your plan and priorities in Wickwar!	25 Feb 2021
Ashfield Land	No comments.	31 Mar 2021
ATA Estates (Longwell Green) LLP and Sovereign Housing Associaton	The proposed policy wording is extremely lengthy and should be broken down into its constituent parts in relation to green infrastructure, public realm, sustainable construction, accessibility and design. The precise wording for the draft policy or policies will need to be considered at future stages of the Plan-making process.	06 Apr 2021
Barwood Development Securities & The North West Thornbury	Creating Well-designed Places: We support the intention of this policy; however, in light of the recently published NPPF review consultation and the National Design Code, it is suggested that a substantial element of this draft policy and its supporting text may be better placed	12 Apr 2021

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Landowner Consortium	<p>within a ‘Local Design Code.’</p> <p>In moving forward, we suggest that the repetition of national policy and guidance is removed, and that the policy is used to highlight the specific elements of design in regard to South Gloucestershire which the Authority wish to emphasise. We also suggest that the policy should focus on design matters only – and whilst wider elements of the Local Plan are relevant when assessing proposals, there is not a need to replicate these where they are set out elsewhere within the development plan.</p>	
Bloor Homes	<p>Draft Policy - Creating Well-Designed Places:</p> <p>6.11 Bloor Homes are committed to the delivery of well-designed, distinctive, high quality new places. We recognise that subsequent to the drafting of this consultation document, that the Government has released a consultation on changes to the NPPF and a National Model Design Code – with these both addressing the need for more effective design policy and guidance.</p> <p>6.12 In accordance with the intentions of these documents, there isn’t a requirement to duplicate national design policy and guidance into local policies, and the draft policy should be revised in light of this. We recognise that in terms of design, the draft policies are likely to need multiple revisions over the coming couple of years, as the national approach to design is formally confirmed.</p> <p>6.13 It is the Government’s intention that Local Authorities should create design codes for their administrative areas and/or individual sites. In this regard, we highlight the importance of working collaboratively with the developer, as per paragraph 19 of the National Model Design Code (January 2021), in creating these for any individual site (and for District level Design Codes with developers active within the Plan area). Actively collaboratively in this way will ensure that the Code is informed by the detailed technical evidence, and represents a scheme which can be delivered.</p> <p>6.14 The National Model Design Code also provides for flexibility in how design codes come forward – they can be drafted by the Authority or Developer, and can come forward in advance of, or within a Planning Application. The most appropriate approach is likely to vary on a site by site basis depending on whether the developer is a housebuilder or promoter, the number of developer parties, and indeed, the capacity of the Authority to produce a design code within a timely manner. At this stage of the nLP process, we suggest an open position is taken on how design codes would come forward, and that this is discussed with the site promoters once preferred options are selected, to ensure that the best approach is agreed for each individual site.</p>	01 Apr 2021
Bristol and England Properties (BEP)	<p>6.8 Whilst we are supportive of a policy which seeks to secure well-designed places, one might question the value of generic policies such as these which often repeat principles/guidance already set out at a national level (e.g. NPPF). One wonders if it would be better to require compliance with established industry guidance like Building for Life 12 with separate policies dictating resource consumption and energy efficiency.</p>	17 May 2021

Respondent Name	User Response: Text	Response Created
Caroline Phillips	<p>Quantity / scale of development should be a factor too.</p> <p>I would like to see more evidence of what SGC's interpretation of exceptional places and spaces. What is the benchmark of this standard and what are the contributors for measuring it ? In what way has current planning approval demonstrated this? Not necessarily evidenced well in larger developments in South Gloucestershire – i.e. Lyde Green, Pucklechurch, Kingswood etc.</p>	12 Mar 2021
Cate Davidson - Sodbury Town Council	<p>Much of what is detailed in this policy is subjective. The policy clearly cannot define what is acceptable in every location, but who is going to determine whether a development proposal complies with the policy. Local residents may well have a different view of what constitutes an acceptable development to those of the planning authority.</p> <p>Why are ground source heat pumps mentioned but not air source heat pumps. Air source heat pumps are much cheaper to install.</p>	03 Mar 2021
Catherine Graham	too general. no real commitment. too much emphasis on consideration and mitigation...easy to wriggle	08 Feb 2021
CEG and the Charfield Landowners Consortium (CEGCLC)	Please see accompanying covering letter.	23 Apr 2021
Chris Rich - Mizmo Communications Ltd	No comment.	11 Mar 2021
Christina Biggs - Friends of Suburban Bristol Railways	A well-designed place is a locality which is car-free. People should not need to use the car to get to local amenities, to work or school or for leisure. The shopping street should be pedestrian-only and have bus-only gates. The only vehicles needing access should be delivery vehicles and this can take place before and after shopping hours. The high street should be pollution and noise free and using trees and grass to create a holiday mood and encourage people to sit outside cafes. There are many experts out there who can design the community around the person and not the car. We recommend that S Glos consult with Jon Usher at Sustrans who can help with place-making, as well as the new Liveable Neighbourhoods campaign in Bristol, as well as the Car-free cities campaign and the BANES council who are taking this seriously in their Transport Delivery Action Plan.	27 Feb 2021
Claire Smith	<p>10 Key Design characteristics</p> <p>3, What is meant by compact development? 6, agree public spaces should be well located, safe and attractive 8, Agree that homes must be healthy safe and comfortable</p> <p>Policy Wording</p> <p>5, uses homes and buildings</p>	26 Feb 2021

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	Safe, secure and healthy living needs to be in a environment where opportunities for criminal activity are designed out. But sadly all too often children's play areas are unusable by the children as teenagers vandalise the equipment. Anything that could be done about this would be great.	
Clara Goss - Redrow Homes Ltd	<p>Pegasus comment that the Council's approach will need to be informed by any changes to the NPPF. The Government are currently consulting on proposed changes to the NPPF to reflect Building Better, Beautiful Commission "Living with Beauty" report.</p> <p>It is also considered that the policy as currently drafted is overly long, too prescriptive and lacks any specific local distinctiveness.</p> <p>The Council are reminded that all policy will be required to be subject to full Plan viability testing and to that end the SGLP2020 should not seek to achieve M4(3) standards across all dwellings.</p>	26 Apr 2021
Clifton Homes (SW) Ltd	We do not seek to comment on these at this stage.	24 Mar 2021
Colin Gardner - TRAPP'D	No comment.	15 Mar 2021
Crest Nicholson South West Ltd - Land at Harry Stoke/East of Harry Stoke (South)	<p>Creating Well-designed Places:</p> <p>We support the intention of this policy; however, in light of the recently published NPPF review consultation and the National Design Code, it is suggested that a substantial element of this draft policy and its supporting text may be better placed within a 'Local Design Code.'</p> <p>In moving forward, and in the spirit of the PWP, we suggest that the repetition of national policy and guidance is removed, and that the policy is used to highlight the specific elements of design in regard to South Gloucestershire which the Authority wish to emphasise. We also suggest that the policy should focus on design matters only – and whilst wider elements of the Local Plan are relevant when assessing proposals, there is not a need to replicate these where they are set out elsewhere within the development plan.</p>	12 Apr 2021
Dan Erben - Thornbury Market Garden	Community participation should not only be sought more actively, but should be absolutely essential to design. This could be partially facilitated through the developers (where applicable) by requiring them to involve the community and prospective new residents in design.	23 Feb 2021
Daphne Dunning - Cromhall Parish Council	See previous answers	03 Mar 2021
Daphne Dunning - Pucklechurch Parish Council	Quantity / scale of development should be a factor too. ? I would like to see more evidence of what SGC's interpretation of exceptional places and spaces. What is the benchmark of this standard? In what way has current planning approval demonstrated this? Not necessarily evidenced well in larger	08 Apr 2021

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	developments in South Gloucestershire. Too much subjective language.	
David George	Eventually most vehicles will not be fossil fuel powered but congestion will still be an issue. Incorporate policies and implement vehicle reduction schemes.	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	No comment	27 Feb 2021
David Heape	Quantity / scale of development should be a factor too. I would like to see more evidence of what SGC's interpretation of exceptional places and spaces. What is the benchmark of this standard and what are the contributors for measuring it? In what way has current planning approval demonstrated this? Not necessarily evidenced well in larger developments in South Gloucestershire – i.e. Lyde Green, Pucklechurch, Kingswood etc.	12 Mar 2021
David Redgewell - South West Transport Network and Railfuture Severnside	This policy needs to include liveable neighbourhood. Good equalities designs for street and quality design codes for building and quality building design in historic town centres such as Kingswood Town centre. Support for local listings and Conservation Area. We need high quality public spaces with good disabled access for blind people and disabled wheelchair users. We need to keep continues pavements and kerbs. Public Transport corridors need to be planned into new development. We also need design briefs.	28 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
Donna Simmons - Emersons Green Town Council	No	01 Mar 2021

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Edward Ware Homes	<p>Creating Well-designed Places:</p> <p>6.9 Whilst we are supportive of a policy which seeks to secure well-designed places, one might question the value of generic policies such as these which often repeat principle/guidance already set out at a national level (e.g. NPPF). One wonders if it would be better to require compliance with established industry guidance like Building for Life 12 with separate policies dictating resource consumption an energy efficiency.</p>	05 May 2021
Ellandi LLP On Behalf of Crestbridge Corporate Trustees Ltd and Crestbridge T...	<p>It is not understood what the purpose or meaning of “compact development” is under bullet point 3 of the purposes section on Page 173.</p> <p>The policy covers the range of issues that would be considered applicable across the administrative area and this approach is supported.</p> <p>We also support the recognition in the policy that there will be a need to construct additional/bespoke design policy considerations for some or all of the Urban Lifestyle locations. In developing the specific policies for locations such as Yate Town Centre, it would be helpful for the policies to link back to relevant parts of this policy and where these are superseded, this should be clearly identified.</p>	05 May 2021
Emma Jarvis	<p>Yes. There will be conflict between this policy and the Energy Management policy if PassivHaus standards are stipulated.</p> <p>Construction product manufacturers have to regularly pay to be accredited and certified by Passivhaus so you find that the specifier / designer is very restricted by the product choices in the market to comply. You find that mostly the larger worldwide product manufacturers can afford the time and money to pursue Passivhaus accreditation and this is to the detriment of smaller perhaps more local and regional South Gloucestershire based businesses and their skills. The only compliant products within their strict selection system for certain items might need to be imported from e.g. Germany/Belgium where the standard is more established. This has implications in terms of material cost, travel miles and also an effect on what a building might look like if product choice is so limited. This has appearance ramifications for areas where a particular aesthetic is required to blend in with a particular regional vernacular of buildings.</p> <p>There is also debate on the merits of window sizes vs. Passivhaus compliance vs fitting into a regional vernacular style that your urban designers / conservation department need to be aware of.</p>	28 Feb 2021
Fiona Milden - Vistry Homes Limited	<p>Vistry Homes broadly supports the design principles set out in this draft policy. The principles are robust and comprehensive, aspiring towards high standards and quality through all aspects of design, wherever possible and appropriate. In this regard, the recognition built into the policy that not all developments will be capable of meeting all design principles, is welcomed.</p>	09 Mar 2021
Fi Riches	<p>Stop putting the front door of houses away from where people park their cars. No one likes these front doors that lead to no-where and only used by the postman.</p>	09 Dec 2020
Gary Parsons - Sport England	<p>Promote new places for playing fields and places for formal sport and informal recreation.</p>	11 Feb 2021

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	<p>Need to provide good design in development (new/regeneration): as in Active Design on SE website</p> <p>1. Activity for all Neighbourhoods, facilities and open spaces should be accessible to all users and should support sport and physical activity across all ages. Enabling those who want to be active, whilst encouraging those who are inactive to become active.</p> <p>2. Walkable communities Homes, schools, shops, community facilities, workplaces, open spaces and sports facilities should be within easy reach of each other. Creating the conditions for active travel between all locations</p> <p>3. Connected walking & cycling routes All destinations should be connected by a direct, legible and integrated network of walking and cycling routes. Routes must be safe, well lit, overlooked, welcoming, wellmaintained, durable and clearly signposted. Active travel (walking and cycling) should be prioritised over other modes of transport. Prioritising active travel through safe, integrated walking and cycling routes.</p> <p>4. Co-location of community facilities The co-location and concentration of retail, community and associated uses to support linked trips should be promoted. A mix of land uses and activities should be promoted that avoid the uniform zoning of large areas to single uses. Creating multiple reasons to visit a destination, minimising the number and length of trips and increasing the awareness and convenience of opportunities to participate in sport and physical activity.</p> <p>5. Network of Multifunctional Open Space A network of multifunctional open space should be created across all communities (existing and proposed) to support a range of activities including sport, recreational and play and other landscape features including Sustainable Drainage Systems (SuDS), woodland, wildlife habitat and productive landscapes (allotments, orchards). Facilities for sport, recreation and play should be of an appropriate scale, positioned in prominent locations, co-located with other appropriate uses whilst ensuring appropriate relationships with neighbouring uses. Providing multifunctional spaces opens up opportunities for sport and physical activity</p>	

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	<p>and has numerous wider benefits.</p> <p>6. High Quality Streets and Spaces Flexible and durable high quality streets and public spaces should be promoted, employing high quality durable materials, street furniture and signage. Well designed streets and spaces support and sustain a broader variety of users and community activities</p> <p>7. Appropriate Infrastructure Supporting infrastructure to enable sport and physical activity to take place should be provided across all contexts including workplaces, sports facilities and public space, to facilitate all forms of activity. Providing and facilitating access to facilities and other infrastructure to enable all members of society to take part in sport and physical activity.</p> <p>8. Active Buildings The internal and external layout, design and use of buildings should promote opportunities for physical activity. Providing opportunities for activity inside and around buildings</p> <p>9. Management, maintenance, monitoring & evaluation The management, long-term maintenance and viability of sports facilities and public spaces should be considered in their design. Monitoring and evaluation should be used to assess the success of Active Design initiatives and to inform future directions to maximise activity outcomes from design interventions. A high standard of management, maintenance, monitoring and evaluation is essential to ensure the long-term desired functionality of all spaces.</p> <p>10. Activity Promotion & Local Champions Promoting the importance of participation in sport and physical activity as a means of improving health and wellbeing should be supported. Health promotion measures and local champions should be supported to inspire participation in sport and physical activity across neighbourhoods, workplaces and facilities. Physical measures need to be matched by community and stakeholder ambition, leadership and engagement.</p>	
Hannick Homes	The principle of well designed places is at the heart of Government policy. This is fully supported by Hannick Homes.	25 Mar 2021
Heather Elgar - Woodland Trust	Creating well-designed places: 'Nature and public spaces' section	12 Feb 2021

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	<p>Over and above net gains in tree cover, we would like to see South Gloucestershire Council adopt a requirement that all new developments will achieve at least 30% canopy cover (see Emergency Tree Plan: https://www.woodlandtrust.org.uk/publications/2020/01/emergency-tree-plan/).</p> <p>In addition, we would like policies that require:</p> <ul style="list-style-type: none"> • That new trees should be sourced & grown in the UK, or be sourced from nurseries with sound biosecurity measures, to help avoid the spread of disease; • That new trees are ecologically appropriate to the site and support nature recovery aims, and a diversity of species are planted. Natural regeneration should be considered where appropriate. 	
Helen Johnstone - Stroud District Council	<p>3. Movement SDC welcome the policy approach relating to movement, including the integration of development with the wider area, to maximise connections to sustainable transport networks, public rights of way and strategic green infrastructure corridors/routes, and provide safe and sustainable access to key services and facilities.</p> <p>The policy could also include reference to design measures, including surface treatments and signposting, to promote accessibility for all users and support inclusive community development.</p> <p>4. Nature and public spaces The policy should include reference to the design of green and blue infrastructure to maximise connections to the ecological network and, in the case of major development proposals, delivery to Building with Nature or equivalent standards.</p>	26 Feb 2021
IM Land	<p>83. As a matter of principle, IM Land supports the creation of well design places, but the policy wording proposed is overly prescriptive and will result in removing the opportunity for innovation. By way of an example, a Plan should not prescribe a particular way that windows are arranged on all buildings. This should be a matter for independent design review on a scheme-by-scheme basis.</p> <p>84. Likewise, there is concern that the Urban Lifestyles approach suggests the creation of compact, efficient, and healthy urban areas. As we have seen in recent times, compact and efficient housing does not always lead to a healthy urban area.</p> <p>85. In a similar manner, the movement section of the proposed policy is again too prescriptive and overly complex. The priority for walking and cycling is understood and should be extended to e-cycling and potentially other sustainable travel modes.</p> <p>86. Regarding nature and public spaces, again, IM Land support the general principles, but the detail is too great for the policy to be workable and relate to every circumstance. There is also a contradiction between seeking lots of incidental open spaces and an expectation elsewhere in the Plan to consolidate space to make it of a meaningful scale for recreation and play. The approach should be rationalised to create clarity for those tasked with delivering development.</p> <p>87. As with other parts of the policy the housing element could be simplified and much of it used as supporting text. It would be helpful to better understand what the</p>	11 May 2021

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	<p>term ‘adaptable’ means given that it can have a very significant impact upon viability.</p> <p>88. As with many of the other policies in the Core Strategy Review, IM Land supports the application of the M4(2) accessibility standards which is now becoming an industry standard.</p> <p>89. However, the application of the accessibility standard M4(3) to all new housing would have a material impact on the Plan’s delivery. Cost increase estimates provided to the Government’s Housing Standards Review by EC Harris estimated £15,691 per apartment and £26,816 per house. Again, this is something that should be considered as part of the whole Plan viability exercise which is encouraged by national policy. It is noted that the NPPG (ID 56-008-20150327) only requires this for dwellings over which the Council has housing nomination rights. Therefore, it should only be required in these specific circumstances.</p>	
IM Land Limited	8.3 The proposed Creating Well-Designed Spaces policy is supported. However, the draft policy will need to be amended to reflect the new approach proposed within the NPPF and National Model Design Guide consultation (January 2021).	26 Mar 2021
Ivywell Capital (IC)	6.8 Whilst we are supportive of a policy which seeks to secure well-designed places, one might question the value of generic policies such as these which often repeat principles/guidance already set out at a national level (e.g. NPPF). One wonders if it would be better to require compliance with established industry guidance like Building for Life 12 with separate policies dictating resource consumption and energy efficiency.	17 May 2021
James Carpenter - Falfield Parish Council	No.	14 Apr 2021
Jenny Raggett - Transport for New Homes	The impact of parking on the quality of place needs explanation. Transport for New Homes have visited many new housing areas and have been struck by the way that over-provision of parking and car-access have a very much detrimental effect on place-making and walkability. Please visit our Web site.	01 Mar 2021
John Acton	No.	26 Mar 2021
John Brimacombe	see earlier comments re future demographics.	28 Feb 2021
John Mills - Cotswolds Conservation Board	<p>In principle, the Cotswolds Conservation Board supports the requirement for development proposals to contribute to the distinctiveness and identity of the area.</p> <p>Several of the ‘special qualities’ of the Cotswolds National Landscape are particularly relevant to this policy:</p> <ul style="list-style-type: none"> • The unifying character of the limestone geology – its visible presence in the landscape and use as a building material. • Variations in the colour of the stone from one part of the AONB to another which add a vital element of local distinctiveness. 	16 Mar 2021

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	<ul style="list-style-type: none"> • Distinctive settlements, developed in the Cotswold vernacular, high architectural quality and integrity. <p>As ‘special qualities’ of the Cotswolds National Landscapes, these are key attributes on which the priorities for the area’s conservation, enhancement and management should be based. The importance of these special qualities should be reflected in the policy.</p> <p>Policy CE3 of the Cotswolds AONB Management Plan 2018-2023 sets out policies on ‘local distinctiveness’. The Board’s publication on ‘Local Distinctiveness and Landscape Change’ explores how the built environment contributes to the distinctive character of the National Landscape. In addition, the Cotswolds AONB Landscape Strategy and Guidelines provides guidance on issues relating to the design of new development.</p> <p>We recommend that the ‘Creating well-designed places’ policy should require development within the Cotswolds National Landscape to be consistent with – and make a positive contribution to - these special qualities, polices and guidance.</p>	
Jonathan Edwardes - Pilning and Severn Beach Parish Council	<p>Conserving designated sites, support needs to be provided to owners of designated sites. Council to be a conduit to technical help and sources of financial assistance. Proximity to two motorways and growing industry are having an impact on the air quality of our area.</p> <p>Flood Risk. We welcome the improvements to the sea defences, work in progress. But we wish to have re-assurances from higher authority that the defences will continue to be maintained to a high standard, until a comprehensive plan is made for the re-location of all residents.</p> <p>This is an opportunity to consider changes to the Green Belt designation. The Parish Council believes that the Green Belt should be extended to the boundary of the Severnside Enterprise Area. This is necessary to preclude the ad-hoc encroachment by development, already demonstrated, which the LPA is ill-equipped to stop by means of ‘other policies’.</p> <p>Additional comments sent by email on Monday 1st March 2021 -</p> <p>SGC should instigate a full review of Conservation Areas and consider proposals for new ones. To assist in the planning process, SGC should assist each community to identify its own ‘vernacular’, so that when contentiously designed development proposals are submitted a local identity is available.</p>	26 Feb 2021
Kate Kelliher	This part of the document was so waffley that I didn’t have a clue what it meant, or indeed if it meant anything at all.	31 Jan 2021
Katherine Adair - UK Green Building Council	We support the inclusion and reference to reducing the use of natural resources and minimising embodied carbon emissions, however in order to achieve meaningful outcomes and reduce embodied carbon emissions, the following policy requirements are recommended for residential developments:	17 Mar 2021

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	<p>As a minimum: It is recommended that local authorities set a requirement for all new homes as follows:</p> <p>All developments shall demonstrate actions taken to reduce embodied carbon and maximise opportunities for reuse through the provision of a Circular Economy Statement.</p> <p>And the following is recommended for major developments:</p> <p>Major developments (defined as those with 10 or more dwellings or 1000 square metres of floor space) shall calculate whole lifecycle carbon emissions (including embodied carbon emissions) through a nationally recognised Whole Lifecycle Carbon Assessment methodology and demonstrate actions taken to reduce lifecycle carbon emissions.</p> <p>The above should be accompanied by a commitment that all public buildings and infrastructure should lead by example by disclosing such data.</p> <p>As a stretch target</p> <p>In addition to the disclosure requirement for public buildings and infrastructure, we recommend the following policy for all developments:</p> <p>All developments shall calculate whole life-cycle carbon emissions (including embodied carbon emissions) through a nationally recognised Whole Life-cycle Carbon Assessment methodology and demonstrate actions taken to reduce life-cycle carbon emissions. Data gathered will serve as the basis for the introduction of carbon reduction targets in due course.</p> <p>And for major developments: Major developments should target <500 kgCO₂e/m² upfront embodied carbon emissions (equating to the emissions covered by Modules A1-A5 of the RICS methodology).</p> <p>Consistent data is not yet widely available for all life stages of a whole life-cycle carbon assessment. However, data for upfront embodied carbon emissions (the product and construction stages) is already reasonably good, which is why we are recommending setting a target for them. The recommended target of <500 kgCO₂e/m² is aligned with the LETI best practice 2020 recommended target for upfront embodied carbon and is also referred to by the GLA as a current aspirational benchmark for apartment buildings. As data for the later life-cycle stages starts to become more widely available, it will be right to move over time towards setting targets for these and for whole life-cycle carbon emissions as a whole. By 2025, it is expected that</p>	

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	<p>data for whole life-cycle emissions will be more widely available, and so it is recommended that by this date upfront embodied carbon emission targets are tightened, and new targets for whole life-cycle carbon emissions are also introduced in line with industry understanding at the time.</p> <p>For non-domestic buildings, we recommend policies following the same approach as residential. We are currently formalising our position relating to the targets that we recommend for non-residential developments, and this will be available over the coming months. Once we have confirmed this UKGBC would be happy to have a further discussion around the recommended targets.</p>	
Kevin Masters	I have read Trapp'd's response and wish to add my name to it.	25 Feb 2021
Lauren Cook - Stride Treglown	No, it is considered that all priority issues relevant to the creation of well-designed places are addressed through this policy.	01 Mar 2021
Lee Taylor	Make sure your data is robust and system engineering is used to define requirements before you make decisions. Blend with natural environment and not be like lyde green	23 Jan 2021
Lesley Brown	<p>10 Key design characteristics</p> <p>3) Not quite sure what is meant by compact development</p> <p>6) Agree that public spaces must be well-located, safe and attractive</p> <p>8) Agree that homes must be healthy, comfortable and safe</p> <p>Policy wording</p> <p>5) Uses, homes and buildings b)</p> <p>I agree that safe, secure healthy living needs to be in environments where opportunities for criminal activity are designed out. eg. Sadly, all too often a playground for young children is made unusable due to it being vandalised by teenagers leaving smashed glass bottles etc in the area. Anything that can be done to deter this would be welcome.</p>	15 Feb 2021
Lizzie Staley	<p>The homes and land uses that already exist should be respected. People don't want to have their view and wellbeing suddenly crowded by homes and traffic noise, dangerous roads and disappeared green spaces that used to provide recreation and exercise space outside their doors. If this is taken away, people would have to use their cars to drive somewhere to exercise.</p> <p>Will developers actually stick to it, or will they ignore the rules as they have done in other locations?</p>	28 Feb 2021
Louise Powell - Thornbury Town Council	Flexibility should be available to be specific about the type and range of housing to meet needs in different areas.	08 Apr 2021
Martyn Hall	Thornbury high street is dead now you have closed it off so please rethink it with brains and don't cock it up more . There are lots of charity shops and empty shops !	26 Feb 2021
Martyn Hopkins	As a resident of Kington, a small village on the outskirts of Thornbury, we have a number of concerns about potential future developments within or around our village. As rural area, we are surrounded by mainly agricultural land. Agricultural	22 Feb 2021

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	<p>Land Management allows for tree/ hedgerow development/ maintenance and as such this forms an extensive habitat for wildlife. We have a plethora of wildlife that we see on a regular basis: Badgers, Heron, Nesting pairs of Buzzards, Weasels, Owls, Foxes, and a huge variety of wild birds. Any future developments within this area would greatly impact on the current wildlife levels.</p> <p>In addition to this, Kington is within a Flood Plain. Although there is a level of flood water management, as standard as it is an agricultural area. That said, we still have issues annually with flooding along our local road network.</p> <p>Like all villages there is an element of history. Local to Kington is Thornbury Castle and St Mary's church. Building NEW Housing within the vicinity of this will greatly effect the nature of historic structures and ambience created by these historic buildings.</p> <p>Finally, our current road infrastructure is based upon a local small village, and to add new housing within this area, increasing traffic. The current infrastructure doesn't managed safely the current level of housing, let alone adding extensively more to the mix. Often the roads are only passable by a car at a time!!!</p>	
Matthew Blaken - DJ&P Newland Rennie Ltd	This is a very subjective policy and a more evidenced based approach / review process should be adopted.	14 Dec 2020
Matthew McCollom	The principles are sound. The manner of implementation is the key.	28 Feb 2021
Maurice Wayne	No	08 Feb 2021
Mel Clinton - Nash Partnership	10. Key design characteristics – whilst the draft policy refers to aspects of residential design, such as adaptability and internal storage provision there is no mention of the likely long-term growth in people working from home at least some of the time. This is a key societal trend that should be considered in policy terms.	01 Mar 2021
Michelle Greaves	Include and account for HMOs in the context of the area	03 Feb 2021
Mike Bennewitz	I don't agree with the proposed designs for a non urban area	23 Feb 2021
Mr. A. D. England	8.3 The proposed Creating Well-Designed Spaces policy is supported. However, the draft policy will need to be amended to reflect the new approach proposed within the NPPF and National Model Design Guide consultation (January 2021).	29 Mar 2021
Mr. Blake - Oldland Parish Council	As above	17 Feb 2021
Neil Oviatt	<p>Less density and better design..</p> <p>Take the finished development by Bloor homes on Morton Way - You have Childrens play areas near main roads, a hideous 4 story yellow rendered house at the highest point on the site (looks ridiculous) and then whatever was considered as</p>	30 Nov 2020

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	<p>suitable in respect of design here you then allow the most ugly , ill fitting co-op built in dark grey brick standing out like a sore thumb with neon signs! Planning officers should be held accountable!! Please walk these sites!</p> <p>New development of market towns should enforce historic-looking builds I.E gerogian town -= Georgian builds, Victorian town = Real stone etc etc Make developers create places to live that excite and make people proud.. Sense of place and character!</p>	
Newland Homes - Land at Aust Road	6.9 Whilst we are supportive of a policy which seeks to secure well-designed places, one might question the value of generic policies such as these which often repeat principles/guidance already set out at a national level (e.g. NPPF). One wonders if it would be better to require compliance with established industry guidance like Building for Life 12 with separate policies dictating resource consumption and energy efficiency.	14 May 2021
Newland Homes - Land West of The B4061 Bristol Road	6.9 Whilst we are supportive of a policy which seeks to secure well-designed places, one might question the value of generic policies such as these which often repeat principles/guidance already set out at a national level (e.g. NPPF). One wonders if it would be better to require compliance with established industry guidance like Building for Life 12 with separate policies dictating resource consumption and energy efficiency.	13 May 2021
Nick Woodward	Any new developments should firstly exploit and maximise the use of brownfield land, perhaps even as on the continent providing garaging/external storage below ground level.	28 Feb 2021
Nicola Flack	If only this was a condition of new developments. The Thornbury developments are terrible, narrow roads, parked up to the hilt with cars over each side of the pavement, where only a single car can fit through. Moving around in a wheelchair or with a pushchair would be impossible. Cycling or walking with children would be very dangerous.	31 Jan 2021
Nicola O'Connell	No comment	27 Feb 2021
Patricia Trull - South Glos Council	I don't think we are creating a good design of homes and place. The developers dictate.	08 Dec 2020
Patrick Williams	This is fundamental in new or redeveloped urban areas.	09 Mar 2021
Paula Evans - Rangeworthy Parish Council	Do not overcrowd development sites; COVID-19 has proved people want more open space around them.	26 Feb 2021
Pauline and Richard Wilson	<p>Green spaces must have connectivity for wildlife movement and also a pleasant place for residents to walk. Unless they are to be used for formal play, they should be sown with low growing wild flowers not cheap Rye grass as at present.</p> <p>House styles should definitely reflect the locality in style and materials. They should not contrast especially in rural locations. Colour of roof tiles should be muted so that they do not stand out in the landscape.</p>	25 Feb 2021

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	<p>Orientation of houses should allow for optimal solar generation on pv panels.</p> <p>Public art should, whenever possible, fulfil a useful purpose e.g. an artistic finger post or seat.</p> <p>Designing houses that are easily adaptable for older age may mean that a small number of people remain in a family 4/5 bed house. This is not desirable.</p> <p>Parking drives must have adequate permeability to the surface to allow drainage.</p> <p>Bris soleil should be spelt brise soleil.</p>	
Persimmon Homes Severn Valley	<p>Please see attached document.</p> <p>Proposed Policies: High Quality Design and Local Distinctiveness:</p> <p>6.11 We note the intention to update existing policy CS1 (High Quality Design) from the adopted Core Strategy and policy PSP1 (Local Distinctiveness) from the Policies Sites and Places Plan.</p> <p>6.12 We support the principle of these policies provided that they are applied appropriately to the specific context in which a development proposal is being considered.</p>	11 May 2021
Peter Box	The policies rely on developers coming on board.	23 Feb 2021
Peter Rawlinson - Gleeson Strategic Land	The proposed policy is currently very long and would benefit from being more succinct. It will also be important to ensure that it does not duplicate existing policies in the NPPF and guidance in the NPPG and National Design Guide and Code. There should also be flexibility for Architects to design schemes with their own character and this may not be achievable if there is not sufficient flexibility in the policy.	10 Mar 2021
Progress Land Ltd	The policy is very detailed and duplicates the general thrust of the NDG. We would question whether all aspects of this policy can be adhered to by developments which deliver intensification of urban areas which does reinforce the concept of delivering growth via new settlements which can be properly planned to deliver these ambitions.	11 May 2021
R. Brown	<p>10 Key design characteristics</p> <p>6. I agree public spaces must be well located, safe and attractive</p> <p>8. I agree homes must be healthy, comfortable and safe, I also feel there is a need to future proof new housing. Features such as solar power, charging points for electric cars and office space for home working needs to be incorporated into new housing.</p>	25 Feb 2021
Rebecca Woodward	Absolutely. Any new developments must maximise use of the land to achieve it's end to reduce the need to develop on other sites.	28 Feb 2021
Redcliffe Homes	No comments.	01 Jun 2021

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Redrow Homes (SW)	<p>Please see enclosed representations.</p> <p>Creating Well Designed Places:</p> <p>5.7 We support this emerging design policy but would ask that the Council ensure it references, and remains consistent with, the published and emerging Central Government design guidance, as set out in the National Design Guide.</p>	29 Apr 2021
Richard Bentham	<p>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.</p>	26 Jan 2021
Richard Lloyd	<p>I note that the Government is consulting on changes to the NPPF which emphasise further the importance of good design and placemaking. This coincided with the publication of a draft national design code and associated guidance in response to the Building Better, Building Beautiful Commission's report 'Living with Beauty'. These documents may indicate that refinements to the policy are required.</p>	03 Mar 2021
Robert Harris - Olveston Parish Council	No	26 Feb 2021
Roger Hall	See TRAPP'D response.	25 Feb 2021
Rosalyn Pyle	No	28 Feb 2021
Sam Scott - South Glos Labour Group of Councillors	<p>We think it is important that new developments are designed with a sense of place in mind, and bring in characteristics from the local area. Arts development should also be involved.</p> <p>We need to ensure that developers build good quality homes, but that they are also affordable.</p> <p>Page 176 states: "The conservation of natural resources, including land, water, energy and materials in buildings and development, will form part of the strategy to mitigate and adapt to the impacts of climate change, helping to provide well-designed places over the longer-term. Acceptable development proposal(s) must demonstrate that" - How does this justify building in the Green Belt?</p>	02 Mar 2021
Sean and Jacqueline Rinaldi	No.	26 Mar 2021
Simon Fitton - YTL Developments (UK) Ltd	<p>Much as the same as the energy policy, this design policy stands at three sides in length which is simply too long and complex; it does not need to be. The policy takes most of its clues from the National Design Guide – these principles do not need to (and should not) be repeated in local policy. There is nothing intrinsically</p>	16 Mar 2021

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	wrong with the intent but this is not the way to speed up the decision making process. If Development Management Planners have to assess every proposal against this policy then it is going to be a hugely bureaucratic and 'tick box' process that benefits no one.	
Simon Moore	Ensure that the priority in all well-designed places is given to the pedestrian, rider and cyclist. Thornbury High Street is a great start - complete this project with a relaid road and pavement that are integrated on one level. Complete similar projects in other county towns and villages.	28 Feb 2021
Simon Steele-Perkins - Waddeton Park Limited	No.	06 May 2021
Sophie Spencer - CPRE Avon and Bristol [South Gloucestershire District]	Avoid the inclusion of anything designated as beautiful, it is too nebulous a concept to be implemented effectively.	02 Mar 2021
Sophie Wainwright - South Glos Disability Equality Network	- The streetscape and associated planning should have disabled access as a cornerstone.	13 Apr 2021
South West Strategic Developments (SWSD)	Please see enclosed representations.	31 Mar 2021
St. Modwen Developments and The Tortworth Estate	We do not have any specific comments on the policy aspirations at this stage as they align to the principles that underline the approach to Garden Village delivery, but we reserve the right to make further comments as the policy progresses. However, in terms of presentation, the policy should be redrafted to be more concise and specific to the locality. The policy should align with national guidance on design but there is no need to repeat it in detail here.	05 Mar 2021
Stephen Hickmans	Design developments to complement the environment, and not to just squeeze as many as possible	26 Jan 2021
Steve Seward	It is unfortunate that the drivers for recent large developments cannot be considered as long lasting and well designed - if any future development occurs then suitability and quality allowing for significant gardens, garages and open spaces must take high priority at the cost of profit, skylines such as Hong Kong, New York, London, Birmingham, must be prevented for South Gloucestershire	13 Feb 2021
Strongvox Homes	Creating Well-designed Places: 6.7 Whilst we are supportive of a policy which seeks to secure well-designed places, one might question the value of generic policies such as these which often repeat principle/guidance already set out at a national level (e.g. NPPF). One	11 May 2021

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	wonders if it would be better to require compliance with established industry guidance like Building for Life 12 with separate policies dictating resource consumption and energy efficiency.	
Sue Green - Home Builders Federation	<p>The Council is proposing to modify adopted Policies CS1 & PSP1 under Creating well-designed places which is based on characteristics of Context & Identity, Built Form, Movement, Nature & Public Spaces, Uses, Homes & Buildings and Resources & Lifespan.</p> <p>The Council's policy approach to achieving well designed places should accord with the 2019 NPPF, the latest NPPG, the National Design Guide and National Design Code. Any local guidance should be specific to the locality rather than repetitive of national policy or guidance. It is noted that the draft policy is too prescriptive, overly long and wordy. The Council should re-draft the policy to be more concise and less repetitive.</p>	05 Mar 2021
Susan Smith	No	16 Feb 2021
Terry Chamberlain and Alan Jobbins	<p>Creating Well-designed Places:</p> <p>6.8 Whilst we are supportive of a policy which seeks to secure well-designed places, one might question the value of generic policies such as these which often repeat principles/guidance already set out at a national level (e.g. NPPF). One wonders if it would be better to require compliance with established industry guidance like Building for Life 12 with separate policies dictating resource consumption and energy efficiency.</p>	05 May 2021
The Tortworth Estate	The policy should be redrafted to be more concise specific to the locality. The policy should align with national guidance on design but there is no need to repeat it in detail.	05 Mar 2021
Tom Cotton - Road Haulage Association	See our response at 3.	01 Mar 2021
Trevor James	Good design is so very important - this can't be underestimated. Whether buildings, landscapes, or open spaces, the quality of the design directly relates to how people feel about their environment and ultimately their happiness and well-being. (Refer to the Design Council again.)	26 Feb 2021
Tristan Clark - South Gloucestershire Council	The 'context and identity' section is terrible and would in practice be detrimental to the public's trust in the planning system. Creating "a new distinctive character" will, in many circumstances, be an anathema to respecting the distinctive character of an area. The convoluted and overly vague wording of this policy is designed to allow planning officers to completely disregard the concerns of residents whenever their subjective appreciation of "the new distinctive character" that has been created takes precedence. It is highly likely that this policy would be further abused by officers seeking to maleate credulous planning committees into concurring with their official recommendations. It must be significantly reworded if not deleted outright.	01 Mar 2021
Trystan Mabbitt	No comment.	18 Mar

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- Hanson UK - Heidelberg Cement Group		2021
Victoria Bailey - Oldbury on Severn Parish Council	The draft policy is comprehensive.	24 Mar 2021
Vistry Group	<p>Please refer to enclosed representations.</p> <p>Creating well-designed places:</p> <p>The draft wording of the Policy ‘Creating well-designed places’ sets out a long list of design requirements to be imposed on all new development proposals. Clearer and more concise policy wording, supported by an explanation in the supporting text, would assist the decision maker (and Applicants) in determining how to assess whether development proposals meet the policy objectives. The policy wording should avoid duplication, including repetition of policies and guidance set by the NPPF and PPG. The NPPF is clear that Plans should set out a clear design vision and expectations, so that Applicants have as much certainty as possible about what is likely to be acceptable.</p> <p>In this regard it is worth noting that the Government is currently consulting on proposed changes to the NPPF (2021) and National Model Design Code. This consultation is published off the back of the Building Better Building Beautiful Commission “Living with Beauty” report and National Design Guide published in 2020. The draft revised NPPF indicates that, ‘to provide maximum clarity about design expectations at an early stage, all Local Planning Authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code and which reflect local character and design preferences. These provide a local framework for creating beautiful and distinctive places with a consistent and high-quality standard of design. Their level of detail and degree of prescription should be tailored to the circumstances and scale of change in each place and should allow a suitable degree of variety where this would be justified.’</p> <p>The direction of travel, therefore, is for design expectations to be set out in locally produced Design Codes. The role and scope of local design codes/guides and masterplans should be clearly articulated within the SGLP to provide certainty to developers and promoters.</p> <p>With regard to Biodiversity Net Gain requirements, the policy approach should reflect the Government’s Draft Environment Bill, which will contain mandatory net gain requirements for new developments. The potential significant additional costs for Biodiversity net gain should be fully accounted for in the Council’s viability assessment at the Plan-making stage. It is also inevitable that some development sites will not be able to provide net gain on-site owing to site specific circumstances and constraints. The Council should, therefore, be proactively seeking solutions to help enable developments to meet BNG targets, including off-</p>	06 May 2021

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	<p>site solutions where necessary. In this regard there is an opportunity for publicly owned land to be utilised to facilitate Biodiversity net gain in a manner that is well controlled and maintained to secure net gain in perpetuity.</p>	
Waddeton Park Ltd - Land at Hicks Common Road	<p>80. As a matter of principle, we support the creation of well designed places, but the policy wording proposed is again, overly prescriptive and will result in removing the opportunity for innovation. As an example, a Plan should not prescribe a particular way that windows are arranged on all buildings. This should be a matter for independent design review on a scheme-by-scheme basis. It would be more appropriate for this to be contained in a separate design guide.</p> <p>81. Likewise, there is concern that the Urban Lifestyles approach suggests the creation of compact, efficient, and healthy urban areas. As we have seen in recent times, compact and efficient housing does not always lead to a healthy urban area.</p> <p>82. In a similar manner, the movement section of the proposed policy is again too prescriptive and overly complex. The priority for walking and cycling is understood and should be extended to e-cycling and potentially other sustainable travel modes.</p> <p>83. Regarding nature and public spaces, again, Waddeton Park Ltd support the general principles, but the detail is too great for the policy to be workable and relate to every circumstance. There is also a contradiction between seeking lots of incidental open spaces and an expectation elsewhere in the Plan to consolidate space to make it of a meaningful scale for recreation and play. The approach should be rationalised to create clarity for those tasked with delivering development.</p> <p>84. As with other parts of the policy the housing element could be simplified and much of it used as supporting text. It would be helpful to better understand what the term ‘adaptable’ means given that it can have a very significant impact upon viability.</p> <p>85. As with many of the other policies in the Core Strategy Review, we support the application of the M4(2) accessibility standards which is now becoming an industry standard.</p> <p>86. However, the application of the accessibility standard M4(3) to all new housing would have a material impact on the Plan’s delivery. Cost increase estimates provided to the Government’s Housing Standards Review by EC Harris estimated £15,691 per apartment and £26,816 per house. Again, this is something that should be considered as part of the whole Plan viability exercise which is encouraged by national policy. It is noted that the NPPG (ID 56-008-20150327) only requires this for dwellings over which the Council has housing nomination rights. Therefore, it should only be required in these specific circumstances.</p>	17 May 2021
William Howell	No	23 Feb 2021

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