
Report on Questionnaire Answers

Questionnaire: Local Plan 2020

Question: [9: Strategy- Where will development go] Do you think we have miss...

Respondent Name	User Response: Text	Response Created
Adam Gould	Missing key principle - consider areas of developed land not considered due to illogical settlement boundaries and green belt land.	27 Feb 2021
Adam Mead	No	23 Feb 2021
Alan Jones - Hanham & District Greenbelt Conservation Society	Before consideration of where to build, work travel assessments throughout the Council Area will be necessary, to assess the impact of Climate Change legislation over the term of the plan. Only once actual data has been obtained and assessed can future expenditure on infrastructure, to facilitate compliant growth, commence.	26 Feb 2021
Alan Piper	SGC need to consider recent growth in villages like Wickwar and whether this has been carried out in a sustainable manner. If not, then infrastructure improvements are needed in Wickwar before further developments are considered.	20 Feb 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
Amanda Grundy - Natural England	<p>Building blocks:</p> <p>The ‘building blocks’ focus on Brownfield land and increased density in urban areas, but also potential urban extensions at North and East Bristol Fringe, Thornbury and Yate and a new settlement somewhere in the District. Some more limited growth in other smaller and more rural settlements is also likely to be needed.</p> <p>Two options relating to Green Belt are presented – Option 1 to only look outside GB for development sites and Option 2 to look across the District. The Sustainability Appraisal findings are clear that Option 2 is more sustainable in many ways, partly because the Green Belt is close to Bristol where most services and transport links are. Including GB in the search area would also provide more choice of potential development sites, which should help to meet most development needs outside the Cotswold AONB and with less impact on designated sites and important habitats.</p> <p>However, until the location, scale, and type of proposed development is known, there is clearly potential for all options to result in a variety of direct and indirect impacts on the interests of designated sites, species and the Cotswolds AONB.</p> <p>We also note that the Council has jointly commissioned a renewable energy stud, which will help to inform what type of technology should be used and where it should be located. Again, there are many potential landscape and ecological issues</p>	30 Mar 2021

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	that could result from renewable energy development which will depend on its scale, location and design.	
Amy Gould	See above	28 Feb 2021
Andrew Rigler	Multi story (flats) development is required for both low cost & social housing. I also agree with response provided by TRAPPD.	31 Jan 2021
Andrew Shore	<p>Wider planning needed, not just individual site/application development control</p> <p>Move away from pure policy documents and allow councillors more discretion to take into account the feelings, views, desires & priorities of existing local residents, I.e. more localism localism, rather than the current less-flexible, centrally led policy framework which case officers tend to follow like text books, sometimes without sufficient wider context. More consultation with Parish Councils is needed, will help provide the context, and they should have significantly more influence & say in planning policies & planning decisions for their Parishes.</p> <p>Ensure extent of development is not allowed to change existing areas disproportionately</p> <p>Spread development around the district more evenly, respecting the locals areas and transport infrastructure</p> <p>More consideration of open space, to improve overall living standards & recreation, less focus on maximum density</p> <p>Don't allow a whole ward or Parish to be defined as one single building block areas</p> <p>More provision of non revenue generating community provision</p> <p>Don't try to stop use of cars too much, better to encourage use of other means of transport whilst accepting cars are a part of it, and people will want and have their cars, whatever we think</p>	01 Mar 2021
Andrew Stacey	Building on or near common land should be avoided.	08 Feb 2021
Angela Chapman	<p>Yes. No building within a feasible and reasonable distance of the River Severn. You can see what's happened further up the Severn where large areas have been built on the flood planes causing major flooding issues. Consider future household insurance which will probably NOT be granted to homes built on a flood plain. The cost to local authorities and knock on costs to the police, fire service, hospital as a result of flooding!! Huge and unnecessary.</p> <p>Inland towns can be increased around perimeters marginally and cheaper as they already have the main and necessary services installed. They also have the road infrastructure, which is easier to alter.</p> <p>Rural villages should remain as villages. Towns can be increased marginally and likewise cities. Let's no alter the historic villages. They encourage tourism and temporary migration to places of interest, they encourage the local population to enjoy what's on the doorstep. It's part of our heritage which over the years is</p>	23 Feb 2021

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	gradually being lost to accommodate other nationalities and their demands. They need to appreciate our culture as we do theirs. We do not go elsewhere in the world and make demands to change their cultures. We embrace them as being different and create memories. We have lost so much over the years, we need to hang on to what's left.	
Angela Crabtree	Please see the Trapp'd Response. (Thornbury Residents Against Poorly Planned Development)	28 Feb 2021
Angie Carroll - Parish Council	You need to pay more attention as to whether a village has enough infrastructure to cope with ANY new builds. You don't seem to pay enough attention to that point...	16 Feb 2021
Anne Thomson - Burbank Neighbourhood Watch	No	21 Jan 2021
Annette McLaren	Strong focus and renovation of existing urban areas	28 Feb 2021
Ann O'Driscoll - North Bristol SusCom Ltd	We agree on the principles of sustainability and proximity of services and public transport network (current and planned).	01 Mar 2021
Ashfield Land	Please see enclosed representations. 7.10 We agree with the initial guided principles set out but would like to raise a couple of points which require clarifying as part of the stage of the Plan: <ul style="list-style-type: none"> • We agree with guiding principle number 1, which requires development to be placed in sustainable locations. However, it also states 'alternatively in locations where key services and facilities are capable of being provided as part of the new development' – we would like SGC to clarify that any supporting infrastructure required is achievable and viable, without significant funding gaps. This was a key issue identified through the JSP for Buckover and Charfield and we urge the Authorities not to rely too heavily on Central Government funding to support infrastructure projects that may not come to fruition; and • We support the protection and enhancement of ecological, landscape and heritage designations and their settings. However, we would like clarification that this does not necessarily include the Green Belt, primarily as we consider the Green Belt should be reviewed and land allocated for development on the edge of Bristol to contribute to sustainable transport goals. <p>Do you think we have missed any key, initial guiding principles?</p> <p>7.11 We do not consider that any initial guiding principles have been missed.</p>	31 Mar 2021
ATA Estates (Longwell Green) LLP and Sovereign	In general guiding principles are helpful to establish where development should go. However, it is inevitable that development on greenfield land will be required and as a result some variation to the stated six principles should be applied. Once the objectively assessed need for the area and any unmet need is confirmed	06 Apr 2021

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Housing Associaton	<p>development should be located in the most sustainable locations where key services and facilities are easily accessed by walking and cycling or effective Public Transport. Areas at the highest risk of flooding should be avoided along with environmental assets of most importance such as the AONB and SPA, SAC, Ramsar sites etc. Land currently designated as Green Belt should not automatically be discounted from being considered under these principles. Whilst green infrastructure and sense of place are important considerations these are more detailed design considerations which should not influence the locational strategy of the Plan.</p> <p>The guiding principles would be better expressed (in priority order) as follows:</p> <ol style="list-style-type: none"> 1) Locate new homes, jobs or settlements in places where key services and facilities are easily accessed by walking and cycling or effective Public Transport, or alternatively in locations where key services and facilities are capable of being provided as part of the new development; 2) Sequential approach to building on areas at a high risk of flooding; 3) Protect and enhance the most important ecological, landscape and heritage designations and their settings. <p>In addressing the above principles consideration will also be given to the following:</p> <p>? Plan for a better balance between local jobs and resident workers in our communities.</p> <p>? Protect and or enhance the function and connectivity of our Green Infrastructure and Nature Recovery Networks.</p> <p>? Ensuring that we protect or create a ‘sense of place and character’ when we plan for new development.</p>	
Barratt Homes (Bristol) Ltd	<p>Please see enclosed submission.</p> <p>Developing a growth strategy: potential guiding principles:</p> <p>1.35 Whilst again much will depend on progress with the SDS and the Duty to Co-operate, we welcome the Council’s early thoughts on potential guiding principles. Within the context of considering a potential Spatial Strategy and the role that settlements can play, we would highlight that development at Yate is particularly suitable. The Council will wish to undertake further work to look at the options for accommodating growth within the context of these guiding principles, but we would in particular support locating new homes where key services and facilities are easily accessed by walking and cycling or effective Public Transport (principle one) as well as planning for a better balance between local jobs and workers (principle two) as a strong starting point in looking to achieve sustainable development in adopting all of these guiding principles. Particular focus should be given to the opportunities to accommodate growth at Yate as a sustainable location which avoids the constraints identified elsewhere.</p>	14 Apr 2021

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Barrie Hesketh	Possibly.	16 Feb 2021
BDW South West	<p>BDW agree that development should be proposed in locations where key services and facilities are capable of being provided as part of the new development and building block 2 would afford this capability in bringing forward large scale mix use development allocation sites. In reality, allocations of varying scales will be required by the Local Plan in various forms as outline in the guiding principles however it is considered that urban extensions, as has previously been the case for South Gloucestershire, should be considered as a priority notwithstanding current Green Belt boundaries.</p> <p>In line with national guidance, consideration should only be given to building on Green Belt land after Brownfield, urban and non-Green Belt options have first been investigated. However, in line with the above, allocations of varying scales will be required by the Plan and in order to achieve an acceptable quantum of housing it is considered that a proportion of Green Belt land should be released to facilitate this necessary growth.</p> <p>In reality, allocations of varying scales will be required by the Local Plan in various forms as outlined in the guiding principle. Well planned growth can create exceptional places and must respond to the existing natural, built, historic and landscape assets, while enhancing the future character and distinctiveness of each unique area.</p>	19 Apr 2021
Bloor Homes	<p>Potential Guiding Principles:</p> <p>Guiding Principle 1 and 5:</p> <p>3.8 We support the reference that development should be located in proximity to services and facilities and on key Public Transport corridors. The reference on p67 that employment must be in walking and cycling distance is not supported – with the NPPF clear that opportunities to access employment via sustainable travel modes (including Public Transport) should be maximised. There is no requirement that employment is accessible via walking and cycling only; and we consider given the development context of South Gloucestershire, is unlikely to be deliverable in practice. The West of England Local Industrial Strategy (July 2019) indicates that clean, inclusive growth is about connecting communities to jobs, training and services in a sustainable and low Carbon way; and ensuring that homes are located where employment is ‘accessible’ (p20, 33 - 34). That is a more realistic and appropriate objective than connecting homes and employment via active travel measures.</p> <p>3.9 We have raised concerns elsewhere with the principle of ‘balancing’ jobs and housing within individual communities. The NPPF does not provide a basis to support this as a principle, and the regional employment market would appear to indicate that this would not be deliverable in practice, and thus undermine any Spatial Strategy upon which it is based. The need for additional employment land, whether at the strategic or local level, must be informed by a robust assessment of need – in terms of quantum, type and location; to ensure that any allocation for</p>	01 Apr 2021

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	<p>employment land is deliverable.</p> <p>Guiding Principle 3:</p> <p>3.10 In protecting and enhancing the ecological, landscape and heritage of South Gloucestershire, it is important that a proportionate approach is taken depending on the asset's importance.</p> <p>Guiding Principle 4:</p> <p>3.11 We support the development of a Nature Recovery Network in line with paragraph 174 of the NPPF. It is important that any evidence base informing the nLP, including the West of England Green Infrastructure work, is subject to appropriate public consultation, and that it is published as part of the evidence base supporting the nLP. There will clearly be a need to refine the earlier work undertaken by WECA in response to comments made through the due consultation process.</p>	
<p>Bloor Homes and Maximus Strategic Warmley Ltd</p>	<p>Please see enclosed submission.</p> <p>4. DEVELOPING A GROWTH STRATEGY: POTENTIAL GUIDING PRINCIPLES:</p> <p>4.1 In looking at the potential guiding principles, we recognise that the Council is clearly at a very early stage in its new Plan preparation process and moreover, it will be in due course important to reflect the requirements of the WECA SDS. However within that context, we express broad support for the emerging principles as stated below and make the following observations in relation to our clients' land interests at Warmley and the significant potential that exists there to contribute to the emerging Local Plan's needs:</p> <p>PRINCIPLE 1: "Locate new homes, jobs or settlements in places where key services and facilities are easily accessed by walking and cycling or effective Public Transport, or alternatively in locations where key services and facilities are capable of being provided as part of the new development" - We have previously submitted significant evidence pointing to the relative sustainability of accommodating new development in this broad location at Warmley, including the significant benefits arising from links with the MetroBus and a proposed Mobility Station/Hub and Park and Ride facility. At this stage we would highlight the potential opportunities for:</p> <ul style="list-style-type: none"> • Provision of (smart) employment uses to address imbalance between jobs/homes on East Fringe. • Proximity to the Science Park and other employment in the East Fringe and the associated opportunities for further self-containment. • Provision of work-related facilities within the site to enable/encourage/assist home working (e.g. printing, meeting, conferencing facilities), particularly in the aftermath of the Covid-19 lockdown. 	<p>29 Mar 2021</p>

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	<ul style="list-style-type: none"> • Provision of a Mobility Station/Hub to integrate the various forms of transport proposed to/from/within the site and provide “first and last mile solutions” to connect communities to frequent Public Transport services. <p>Transport Opportunities:</p> <ul style="list-style-type: none"> • Proximity to the Bristol - Bath cycle path and other proposed strategic cycle routes. · Provision of hire schemes (electric bike, pedal cycle, e-scooter, e-cargo bike etc) for residents and employees. • Establish an electric car club and car sharing scheme serving the site and surrounds. • New bus service to link to the M3 MetroBus service at Emersons Green in the North and to destinations to the South such as Longwell Green or Keynsham. • Proximity to future extensions to the MetroBus network. • Proximity to the proposed mass transit route from the City Centre to the Ring Road. • Potential Park & Ride facility within the site to connect to the mass transit and bus routes. • Improved and additional pedestrian and cycle connections to local facilities walkable neighbourhoods. • Potential Personalised Travel Planning scheme in surrounding area. • Potential Dynamic Demand Responsive Transport (DDRT) using advanced and real time requests (e.g. dial-a-ride, shared taxis etc). • Use of new mobility technology (e.g. Mobility as a Service – Maas – platform). • Potential off-site highway improvements. <p>4.3 PRINCIPLE 2 “Sequential approach to building on areas at a high risk of flooding” - in this respect we would fully support and expect the approach outlined within the NPPF and PPG to being reflected in the approach to site selection and design. At Warmley when looking at our clients' land interests there are no significant constraints in respect of flooding to deliver circa 1,000 new homes and the associated land uses being proposed. In this respect it has significant advantages.</p> <p>4.4 PRINCIPLE 3 “Protect and enhance ecological, landscape and heritage designations and their settings” - The Council will be aware of the technical evidence we have previously submitted looking in respect of Warmley. This is updated by the submission of the vision attached to these representations. It</p>	

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	<p>demonstrates the benefits that can arise from development responding positively to the approach set out within this emerging Local Plan principle.</p> <p>4.5 PRINCIPLE 4 “Protect and enhance the function and connectivity of our Green Infrastructure and Nature Recovery Networks” - The attached vision demonstrates the scale of new open space which could be provided as part of our clients' development proposal at Warmley and how this integrates to existing green infrastructure and networks within the surrounding area. We support this guiding principle and would wish to see it reflected as part of development proposals at Warmley.</p> <p>4.6 PRINCIPLE 5 “Plan for a better balance between local jobs and resident workers in our communities” - Again we support this principle and believe it should be applied on a number of different tiers. Firstly, it justifies the focus on development locations adjacent to the urban edge of Bristol to address the homes jobs mix across the city and the opportunities in this respect. Second, there is a need to look at the North and East Fringe as a whole and the transportation links, homes and jobs provided in this respect. Third, there is a need to look within particular sites (particularly large-scale new sites being proposed in this emerging Plan). In each respect we would suggest that our clients' land at Warmley could offer significant advantages – it provides much-needed new homes close to the urban edge of Bristol, with good transportation links to large centres of employment, and the opportunity of providing new homes and new employment space on this new strategic site. Again, this highlights the sustainability of locating new development at Warmley.</p>	
<p>Bloor Homes South West Ltd - Land at North West Yate</p>	<p>Guiding Principles:</p> <p>Six guiding principles are set out that the document explains will be used to help assess the suitability of potential development locations. The principles are generally acceptable and based on reasonable priorities such as protecting designated sites and taking a sequential approach to land at risk of flooding. However, we would question how the Council will be making the assessments of each principle when deciding whether or not a site should be allocated for development. There is a danger that blanket application of binary criteria could exclude sites that may, when viewed holistically, be the most sustainable locations for development. For example, if part of a large site is within Flood Zone 3 or in the setting of a heritage asset would this mean the whole site is excluded, regardless of any consideration as to whether the constraint could be sensitively accommodated within the development layout?Furthermore, the first criteria seeks to ensure development locations either have good existing access to services and facilities, or that such access ‘can be provided as part of the new development’ – how will the latter criteria be assessed? Care needs to be taken to ensure that the assessment of development locations is not too broad brush and is based, where possible, on site specific information (i.e. that the policies in the Plan are robustly evidenced and therefore sound).</p> <p>In addition, availability/developer involvement is not cited as a guiding principle and this should be a consideration, as it is fundamental to inform the deliverability of any site options, and this will be important when considering the viability of the</p>	<p>25 Mar 2021</p>

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	<p>Plan, and components of it. It is important to ensure that sites included in the future Plan are capable of delivering much needed new homes in a timely manner. Sites that are available and have evidence of deliverability should be considered favourably, and conversely sites without clear availability or deliverability should be treated with caution.</p>	
<p>Bloor Homes South West Ltd - Land at South Farm</p>	<p>Guiding Principles:</p> <p>Six guiding principles are set out that will be used to help assess the suitability of potential development locations. The principles are generally acceptable and based on reasonable priorities such as protecting designated sites and taking a sequential approach to land at risk of flooding. However, we would question how the Council will be making the assessments of each principle when deciding whether or not a site should be allocated for development. There is a danger that blanket application of binary criteria could exclude sites that may, when viewed holistically, be the most sustainable locations for development. For example, if a small part of a large site is within Flood Zone 3 or in the setting of a heritage asset would this whole site be excluded, regardless of any evidence to demonstrate the constraint could be sensitively accommodated within the development layout?</p> <p>In addition, the first criteria seeks to ensure development locations either have good existing access to services and facilities, or that such access ‘can be provided as part of the new development’ – how will the latter criteria be assessed? Care needs to be taken to ensure that the assessment of development locations is not too broad brush and is based, where possible, on site specific information (i.e. that the policies in the Plan are robustly evidenced and therefore sound).</p> <p>Finally, availability/developer involvement is not cited as a guiding principle and this should be a consideration, as it is fundamental to inform the deliverability of any site options, and this will be important when considering the viability of the Plan, and components of it. It is important to ensure that sites included in the future Plan are capable of delivering much needed new homes in a timely manner. Sites that are available and have evidence of deliverability, such as involvement of a key national housebuilder, should be considered favourably, and conversely sites without clear availability or deliverability should be treated with caution.</p>	<p>26 Mar 2021</p>
<p>Bloor Homes South West Ltd - Land at Wotton Road</p>	<p>Six guiding principles are set out that will be used to help assess the suitability of potential development locations. The principles are generally acceptable and based on reasonable priorities such as protecting designated sites and taking a sequential approach to land at risk of flooding. However, we would question how the Council will be making the assessments of each principle when deciding whether or not a site should be allocated for development. There is a danger that blanket application of binary criteria could exclude sites that may, when viewed holistically, be the most sustainable locations for development. For example, if a small part of a large site is within Flood Zone 3 or in the setting of a heritage asset would this whole site be excluded, regardless of any evidence to demonstrate the constraint could be sensitively accommodated within the development layout?</p> <p>In addition, the first criteria seeks to ensure development locations either have good existing access to services and facilities, or that such access ‘can be provided as</p>	<p>20 Apr 2021</p>

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	<p>part of the new development? – how will the latter criteria be assessed? Care needs to be taken to ensure that the assessment of development locations is not too broad brush and is based, where possible, on site specific information (i.e. that the policies in the Plan are robustly evidenced and therefore sound).</p> <p>Finally, availability/developer involvement is not cited as a guiding principle and this should be a consideration, as it is fundamental to inform the deliverability of any site options, and this will be important when considering the viability of the Plan, and components of it. It is important to ensure that sites included in the future Plan are capable of delivering much needed new homes in a timely manner. Sites that are available and have evidence of deliverability, such as Planning Applications pending determination, should be considered favourably, and conversely sites without clear availability or deliverability should be treated with caution.</p>	
Brian Hackland	See 7 above.	26 Feb 2021
Bristol and England Properties (BEP)	<p>1. Locate new homes, jobs or settlements in places where key services and facilities are easily accessed by walking and cycling or effective Public Transport, or alternatively in locations where key services and facilities are capable of being provided as part of the new development.</p> <p>4.26 Agree. There are numerous benefits associated with locating development in places with either good existing access to services and facilities or the potential to make them accessible.</p> <p>4.27 This goes beyond the general imperative to reduce reliance on the private motor vehicle to combat Carbon emissions and Climate Change which is the obvious key benefit. Greater accessibility to said services and facilities helps combat other social and economic issues such as loneliness and unemployment, especially where the use of a private motor vehicle is not an option (e.g. for younger, older and disabled residents).</p> <p>4.28 Increased use of active modes of transport also supports healthier lifestyles and the closer people live to key services and facilities, the more attractive these options become. This is also true of Public Transport where more frequent and shorter journey times go hand in hand with increased usage. Again, this is likely to be achieved where development is located in close proximity to services, facilities and existing transport routes.</p> <p>4.29 The other advantage is that, where the private motor vehicle is used, journeys will typically be shorter and, therefore, emissions will be lower as a result.</p> <p>4.30 The application of this principle will generally (although not necessarily always) lead to the identification of the more sustainable locations of development and, as such, we support this as a guiding principle.</p> <p>2. Sequential approach to building on areas at a high risk of flooding.</p>	17 May 2021

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	<p>4.31 Agree. Paragraph 157 of the NPPF states that, "all Plans should apply a sequential, risk-based approach to the location of development – taking into account the current and future impacts of Climate Change so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:</p> <p>a) Applying the sequential test and then, if necessary, the exception test as set out below;</p> <p>b) Safeguarding land from development that is required, or likely to be required, for current or future flood management;</p> <p>c) Using opportunities provided by new development to reduce the causes and impacts of flooding (where appropriate through the use of natural flood management techniques); and</p> <p>d) Where Climate Change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations."</p> <p>4.32 Paragraph 158 of the NPPF follows this up by stating that "Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.... The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding."</p> <p>4.33 National Policy is clear in the importance of steering new development away from areas at risk of flooding. Indeed, paragraph 158 is clear in its directive that development should not be allocated or permitted where there are reasonably available sites in areas with a lower risk of flooding.</p> <p>4.34 This is not to say that development within areas at risk of flooding is always unacceptable and indeed there may be good reasons for doing so, say, where there are clear sustainability benefits or a lack of land in areas at lower risks of flooding. However, as a general principle, sites in Flood Zone 1 should take precedence over sites in Flood Zones 2 and 3 when it comes to identifying sites for development.</p> <p>4.35 When applying the sequential approach through the Local Plan process, we would stress that a site's Green Belt designation should not be something which dictates whether it is reasonably available or not. This is because the Local Plan process allows for revisions to Green Belt boundaries where there are exceptional circumstances for doing so.</p> <p>4.36 This is different to the very special circumstances that need to be demonstrated under the development management process in order to allow development in the Green Belt and that would otherwise allow a site to be discounted within any sequential assessment.</p> <p>4.37 Indeed, the need to avoid areas of flood risk can be a contributing factor to</p>	

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	<p>demonstrating the exceptional circumstances for releasing land from the Green Belt as there are sound environmental and social reasons for doing so. The judgment in the 2015 court case Calverton Parish Council v Greater Nottingham Council & Others (EWHC 1078) identifies five matters to consider when assessing whether exceptional circumstances are present. One such identified circumstance was the "consequent difficulties in securing sustainable development without impinging on the Green Belt."</p> <p>4.38 The development of greenfield sites in areas of flood risk is inherently unsustainable given that it exacerbates the potential impacts of Climate Change and increases the risks to human life and property. Assuming that the development needs of the District could not be met on sustainable locations outside the Green Belt on land entirely within Flood Zone 1, then this would constitute an exceptional circumstance that would justify development in the Green Belt.</p> <p>4.39 In short, National Policy is clear in that development should be steered away from areas of high flood risk. Key reasons for this are to mitigate the potential impacts of Climate Change and minimise the risk to human life and property. The need to avoid areas of flood risk would be a contributing factor to justifying the release of Green Belt sites in sustainable locations.</p> <p>3. Protect and enhance ecological, landscape and heritage designations and their settings.</p> <p>4.40 Agree. The level of protection afforded should be proportionate to their relative significance, as dictated by the NPPF and relevant legislation. For all potential strategic allocations, the public benefits may need to be weighed against any harms through the Sustainability Appraisal process.</p> <p>4. Protect and enhance the function and connectivity of our Green Infrastructure and Nature Recovery Networks.</p> <p>4.41 Agree. As above, the level of protection afforded should be proportionate and appropriate to the significance of said asset. Proposals should also be considered on a holistic basis, with the net gains that could be facilitated through the loss of certain features that may be necessary to enable development to come forward.</p> <p>5. Plan for a better balance between local jobs and resident workers in our communities.</p> <p>4.42 Agree. The need to commute to and from work is unavoidable for many and this is often done by the private motor vehicle. Locating development in close proximity to areas with good access to existing employment centres and/or delivering employment alongside new residential development can help to promote the use of walking, cycling and Public Transport as an alternative to the private motor vehicle.</p> <p>4.43 There are also social benefits in achieving a good balance between local jobs and resident workers. Offering alternative (and cheaper) options to the private</p>	

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	<p>motor vehicle will improve accessibility to employment for many people, some of whom may not own a car.</p> <p>4.44 Inherently, development at certain rural villages would appear to run against this principle. However, this does not mean that development should not be directed towards villages where reliance on the private motor vehicle is likely to remain relatively high for the reasons set out above.</p> <p>4.45 Furthermore, there has been a significant shift in working and travel patterns as a result of the pandemic with many working from home on a permanent or semi-permanent basis. As such, the sustainability drawbacks to development at rural settlements have been slightly diminished, especially where digital connectivity is good.</p> <p>6. Ensuring that we protect a ‘sense of place and character’ when we plan for new development.</p> <p>4.46 We support this principle in the sense that the protection of place and character should be sought where the current sense of place and character is worth preserving. Opportunities to enhance, improve and create a new sense of place and character should also be explored where the context dictates.</p> <p>Do you think we have missed any key, initial guiding principles?</p> <p>4.47 Whilst we agree with the guiding principles as a sound way in which to identify sustainable locations for growth, the absence of 'deliverability' as a principle is of some concern. As has been alluded to in the Phase 1 document, deliverability issues have led to the Council being unable to demonstrate a robust housing land supply in recent years. This has led to speculative development at many of the non-Green Belt towns and villages coming forward in recent years. Again, whilst this development is not fundamentally unsustainable in nature, it sits outside of an agreed framework which would most likely deliver more sustainable development in the round.</p> <p>4.48 Deliverability, or rather a failure to deliver the housing to meet the District's needs, also has significant social and economic consequences which we have touched on above and are considered in the latest SA.</p> <p>4.49 We accept that deliverability considerations may not be appropriate for the purposes of identifying potential locations for development. However, it should certainly form part of any site sifting exercise that may be undertaken, once these options have been identified.</p> <p>4.50 We would suggest a deliverability metric be applied to all options considered and those considered to be at significant risk of delivery, should be screened out at an appropriate stage.</p>	
Bristol Zoological Society	<p>Please see enclosed submission.</p> <p>5.10 Second, there is a need for the emerging Plan to consider a much wider range</p>	25 Mar 2021

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	<p>of land uses including those needed to support the tourism and visitor economy (recognising that some attractions will not be able to move location in order to grow but are still worthy of an encouraging policy framework);</p> <p>5.11 Third, if the Council is looking for further housing land as part of its wider strategy rehearsed in this section of the consultation document, there may be an opportunity within the Zoological Society’s wider land interests to the South of Easter Compton to accommodate an element of residential development either independently or as part of a mixed use development (the Society responded to the most recent “Call for Sites” in this respect pointing out that sufficient land may be available to accommodate c.400 to 800 new homes and would welcome the opportunity to explore this further with the Council if this is of interest as part of one or more of the “building blocks” discussed within the consultation documentation).</p>	
Caroline Phillips	<p>As above - depends on context ? Plan for a better balance between local jobs and resident workers in our communities</p> <p>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. Localities of work should be spread across a wider area to avoid unsustainable islands of employment. Back to the same problem of traffic, congestion, noise and air pollution concentrated in a select area. This would also help other businesses to set up and develop across a wider footprint.</p> <p>? 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 to to address this in future developments?</p> <p>I 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>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 (financially) will impact a majority negatively.</p>	12 Mar 2021
Cate Davidson - Sodbury Town Council	<p>2. The principle in regard to areas at high risk of flooding is unclear. Instinctively building in such areas is a folly, and there could be little interest from potential homeowners. House design would have to be such that homes were protected from flooding.</p>	03 Mar 2021
Catherine Graham	<p>beyond building blocks 1 and 2 it becomes vague! Far more structure and commitment required re sustainability and protecting rural areas.</p>	08 Feb 2021
CEG and the Charfield Landowners	<p>Please see accompanying covering letter.</p>	23 Apr 2021

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Consortium (CEGCLC)		
Charlcombe Estates	No comment.	04 Mar 2021
Chris Rich - Mizmo Communications Ltd	<p>A key principle has been omitted form the list.</p> <p>The Plan should also, in addition to the other guiding principles, seek to focus development around infrastructure nodes, and notably maximize the benefit of planned new infrastructure, such as the proposed Junction 18A on the M4.</p> <p>The proposed junction will enable a new pattern of movement around this fringe location and should be fully investigated in regard to the opportunities it will create for new development.</p>	11 Mar 2021
Chris Stow	Please see my comments above in section 7 above.	08 Jan 2021
Christina Biggs - Friends of Suburban Bristol Railways	<p>Yes. There is no mention of existing or potential rail stations in this plan apart from one map which shows only operational stations - and no mention of Pilning as a rail station for incoming commuters to reach Severnside businesses, and a potential Park and Rail site for Thornbury and other villages to the north.</p> <p>For Thornbury to be an "Urban Lifestyle" site the Thornbury Rail line must be reopened at least as far as a Park and Rail at Tytherington Quarry. This in turn needs engagement with WECA and Network Rail to bring the Thornbury freight line into passenger use, initially as a shuttle service to Yate and changing trains to the MetroWest Phase 2 service from Gloucester, and then either making use of the Westerleigh Oil Depot line for light rail to Emerson's Green and down the M32, or reinstating the Ram Hill loop to connect the Oil Depot line back to the main Paddington Line with a new station at Coalpit Heath.</p>	27 Feb 2021
Claire Normoyle	<p>See pages 67 to 73</p> <ul style="list-style-type: none"> • Any new settlements must be based around non car-based transport infrastructure only where it is either currently in place or where funding is irrevocably committed. • The need to preserve and not develop the land that is farming BMV Grades 1-3a in the region. • Plan for locations that are a genuine best fit with the priorities, not for planning convenience because a large tract of land has been offered during the call for sites. 	19 Feb 2021
Claire Smith	<p>1. Locate new homes, jobs, settlements in places where key services and facilities are easily accessed</p> <p>The DAP and transport tables are not right and therefore create a false impression of services in the area. This needs t be correct before it is decided where housing should go.</p> <p>4. Protect and enhance the function and connectivity of our green infrastructure and nature recovery networks</p> <p>We need to protect these, why is the greenbelt on Roundways, Coalpit Heath not</p>	26 Feb 2021

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	<p>shown on the map? It is oftent used by familys and walkers.</p> <p>6. Ensuring we protect a sense of place and character when we plan for new development.</p> <p>The Blackberry Park development and the Woodlands farm development taking place at the moment are both on the boundry of Coalpit Heath but included as Frampton Cotterell. This makes it look like Coalpit Heath have not had their share of development, however these are on the border of Coalpit Heath and they both share the same facilities as Coalpit Heath. Again these have not been included in the DAP.</p>	
Clara Goss - Redrow Homes Ltd	<p>Pegasus support the guiding principles for development in as far as they relate to our client's site at Hambrook which is located in a sustainable location, in close proximity to local services and facilities and served by 4 bus routes as indicated by the plan on p.68 of the consultation document. The site is also situated within close proximity to major employers and safeguarded employment areas as identified above and in the Hambrook Data and Access Profile, including within a 16 - 30 minute bus journey of the Emersons Green Enterprise Area which is home to the Bristol and Bath Science Park.</p>	26 Apr 2021
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. 	24 Mar 2021
Colin Gardner - TRAPP'D	<ul style="list-style-type: none"> • Any new settlements must be based around non car-based transport infrastructure only where it is either currently in place or where funding is irrevocably committed. • The need to preserve and not develop the land that is farming BMV Grades1 - 3a in the region. • Plan for locations that are a genuine best fit with the priorities, not for planning convenience because a large tract of land has been offered during the Call for Sites. 	15 Mar 2021
Colin Waterhouse	<p>Yes, there are no substantive plans for infrastructure and the developers by applying for planning permission for small developments have avoided any statutory requirement. It would seem only pragmatic to consider all the development together ,ie as one large scale development as it makes no difference to the final need, avoid this loophole being exploited, and the council exposed to suggestions of collusion.</p>	20 Feb 2021
Crest Nicholson South West Ltd	<p>CNSW agree that development should be proposed in locations where key services and facilities are capable of being provided as part of the new development but as stated already in this response, recognition must be given to the role that new development can bring about in providing the population required to provide key services and facilities to meet demand.</p> <p>In reality, allocations of varying scales will be required by the Local Plan in various forms as outlined in the guiding principle. With regard to guiding principle 6, we agree that new development must be designed so that it is a positive addition to existing communities, in a way that promotes a sense of place, strengthens</p>	15 Mar 2021

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	<p>community identity and reflects local character and key features.</p> <p>Well planned growth can create exceptional places and must respond to the existing natural, built, historic and landscape assets, while enhancing the future character and distinctiveness of each unique area.</p>	
D. Hemmings	See attached representations.	23 Apr 2021
Dan Erben - Thornbury Market Garden	<p>Clear principles which ensure community and environmental benefits.</p> <p>A principle which prevents bias and corruption, especially through conflict of interest and financial interests of developers, the Council and members of the Council.</p> <p>A principle which supports higher public participation and which ensures that community appeals are reviewed fairly and independently and upheld if sound.</p>	23 Feb 2021
Daphne Dunning - Cromhall Parish Council	Yes. There are clear oversights in the plans, where you are ignoring detrimental effects and consequences highlighted by your own research. Thornbury and the rural north of the county are not suitable for the level of development in plan.	03 Mar 2021
Daphne Dunning - Pucklechurch Parish Council	<p>Yes – previous industrial land use is not always evidenced by brownfield sites at surface level, for example, coal has been mined from the South Gloucestershire and East Bristol coalfield for many centuries: development should be avoided in high risk areas and these should be mapped.</p> <p>As stated above, as long as the guiding principles are adhered to, then each of the 5 building blocks needs to be assessed.</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>	08 Apr 2021
David George	As 7	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	I completely agree with your guiding principles and the order in which they are stated.	27 Feb 2021
David Heape	As above - depends on context	12 Mar 2021

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	<p>? Plan for a better balance between local jobs and resident workers in our communities</p> <p>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. Localities of work should be spread across a wider area to avoid unsustainable islands of employment. Back to the same problem of traffic, congestion, noise and air pollution concentrated in a select area. This would also help other businesses to set up and develop across a wider footprint.</p> <p>? 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 to to address this in future developments?</p> <p>I 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>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 (financially) will impact a majority negatively.</p>	
<p>David Redgewell - South West Transport Network and Railfuture Severnside</p>	<p>Yes there needs to be more Plan making around new developments in the Winterbourne, Frampton Cotterell, and Coalpit Heath. As this is a Growth area with the A432 with a transport corridor upgrade through Winterbourne, Coalpit Heath and Westerleigh. As a walking cycle way MetroBus extension to Yate or rapid transit service and bypass.</p> <p>This needs proper planning for new housing and Development.</p> <p>Severn Beach and Severnside need a master plan business development.</p> <p>Road and rail freight facilities.</p> <p>Tourist facilities must be protected at Severn Beach.</p> <p>Passengers train links to Bristol Temple Meads via Avonmouth and the Henbury loop.to Patchway, Cribbs Causeway new housing development.</p> <p>A bus link from Severn Beach, Cabot Park via Portway, Parkway station new station.</p> <p>A fast MetroBus routes via the Portway South Bristol Metro link to Highridge, Withywood, Hartcliffe, Hengrove, Whitchurch.</p>	<p>28 Feb 2021</p>
<p>Debbie Johnson</p>	<p>Infrastructure, more green spaces, encouraging farming and not building on agricultural land.</p>	<p>26 Feb 2021</p>
<p>Derek Fletcher -</p>	<p>There appears to be a shortfall on the provision of facilities to reduce the potential</p>	<p>18 Feb</p>

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Wickwar Youth Centre	of increased motor traffic.	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, which 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.</p> <p>We broadly support the six guiding principles that are proposed to help determine the Local Plan growth strategy. As summarised below and set out in detail within the Lower Shortwood Vision Document, the concept and vision of Lower Shortwood fully accord with all of the proposed guiding principles:</p> <ul style="list-style-type: none"> - Unlike other locations within South Gloucestershire and the wider Bristol urban area fringe, the Lower Shortwood Site benefits from being well located to a diverse range of existing key employment areas as well as district and local centres. As such, in addition to a new on-site local centre with local community facilities, flexible working areas and services, including a new Primary School, the site is within an easy walking and cycling distance to a wide range of existing facilities and services including local employment areas, convenience and food shops, retail, Primary and Secondary Schools, recreation and public open space. - The Lower Shortwood local centre would include a ‘mobility hub’ that would include bus shelters with electronic information boards, cycle parking, charging points for electric bicycles and cars, and the provision of a car club facility. - Lower Shortwood complements the strategies set out within the Joint Local Transport Plan (January 2020), which proposes a Park and Ride located adjacent to the Carsons Road/A4174 roundabout just South West of the site. The Local Transport Plan also identifies expansion routes for the MetroBus along the A4174 Ring Road passing the Western boundary of Lower Shortwood. - Provision of new pedestrian and cycle routes connecting to the existing strong network of Public Rights of Way and the Dramway. - All of the Lower Shortwood Site is Flood Risk Zone 1 (the lowest level of risk). - The concept masterplan protections and enhances ecological, landscape and 	19 Mar 2021

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	<p>heritage designations and their settings.</p> <p>- 53% of the Lower Shortwood Site would be committed to Green Infrastructure, which would include 47 ha. of new parkland public open space along the sites Eastern boundary, creating a new and enduring Green Belt edge.</p> <p>- In addition to the creation of new employment opportunities within the local centre, the Lower Shortwood Site is less than 5km from a number of town and district centres that provide employment opportunities (Emersons Green, Downend, Staple Hill, Kingswood, and Hanham). The Emerald Business Park and Bristol & Bath Science Park, at Emersons Green is approximately 4km to the North. There are a further size other designated Safeguarded Employment Areas within 5km of Lower Shortwood (Staple Hill, Kingswood, Warmley, and Hanham). In recognition of post Covid-19 changing working practices and greater levels of remote/home working, a shared workspace facility with ultrafast Broadband could be accommodated within the Lower Shortwood local centre.</p> <p>- To create a sense of place and character the vision creates five character area neighbourhoods. These character areas could use variation in grain, perceived density, building height and materials to define a response that is both appropriate to the local context and ‘of the place.’</p> <p>In view of this, the Lower Shortwood Site should be considered as a reasonable option as part of the emerging Local Plan process.</p>	
Donna Simmons - Emersons Green Town Council	No	01 Mar 2021
Edward Ware Homes	<p>4.26 Our comments on the six guiding principles are listed below:</p> <p>1. Locate new homes, jobs or settlements in places where key services and facilities are easily accessed by walking and cycling or effective Public Transport, or alternatively in locations where key services and facilities are capable of being provided as part of the new development.</p> <p>4.27 Agree. There are numerous benefits associated with locating development in places with either good existing access to services and facilities or the potential to make them accessible.</p> <p>4.28 This goes beyond the general imperative to reduce reliance on the private motor vehicle to combat Carbon emissions and Climate Change which is the obvious key benefit. Greater accessibility to said services and facilities helps combat other social and economic issues such as loneliness and unemployment, especially where the use of a private motor vehicle is not an option (e.g. for younger, older and disabled residents).</p> <p>4.29 Increased use of active modes of transport also supports healthier lifestyles and the closer people live to key services and facilities, the more attractive these</p>	05 May 2021

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	<p>options become. This is also true of Public Transport where more frequent and shorter journey times go hand in hand with increased usage. Again, this is likely to be achieved where development is located in close proximity to services, facilities and existing transport routes.</p> <p>4.30 The other advantage is that, where the private motor vehicle is used, journeys will typically be shorter and, therefore, emissions will be lower as a result.</p> <p>4.31 The application of this principle will generally (although not necessarily always) lead to the identification of the more sustainable locations of development and, as such, we support this as a guiding principle.</p> <p>2. Sequential approach to building on areas at a high risk of flooding.</p> <p>4.32 Agree. Paragraph 157 of the NPPF states that, "all Plans should apply a sequential, risk-based approach to the location of development – taking into account the current and future impacts of Climate Change so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:</p> <ul style="list-style-type: none"> a) Applying the sequential test and then, if necessary, the exception test as set out below; b) Safeguarding land from development that is required, or likely to be required, for current or future flood management; c) Using opportunities provided by new development to reduce the causes and impacts of flooding (where appropriate through the use of natural flood management techniques); and d) Where Climate Change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations." <p>4.33 Paragraph 158 of the NPPF follows this up by stating that "Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.... The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding."</p> <p>4.34 National Policy is clear in the importance of steering new development away from areas at risk of flooding. Indeed, paragraph 158 is clear in its directive that development should not be allocated or permitted where there are reasonably available sites in areas with a lower risk of flooding.</p> <p>4.35 This is not to say that development within areas at risk of flooding is always unacceptable and indeed there may be good reasons for doing so, say, where there are clear sustainability benefits or a lack of land in areas at lower risks of flooding. However, as a general principle, sites in Flood Zone 1 should take precedence over</p> 	

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	<p>sites in Flood Zones 2 and 3 when it comes to identifying sites for development.</p> <p>4.36 When applying the sequential approach through the Local Plan process, we would stress that a site's Green Belt designation should not be something which dictates whether it is reasonably available or not. This is because the Local Plan process allows for revisions to Green Belt boundaries where there are exceptional circumstances for doing so.</p> <p>4.37 This is different to the very special circumstances that need to be demonstrated under the development management process in order to allow development in the Green Belt and that would otherwise allow a site to be discounted within any sequential assessment.</p> <p>4.38 Indeed, the need to avoid areas of flood risk can be a contributing factor to demonstrating the exceptional circumstances for releasing land from the Green Belt as there are sound environmental and social reasons for doing so. The judgment in the 2015 court case <i>Calverton Parish Council v Greater Nottingham Council & Others</i> (EWHC 1078) identifies five matters to consider when assessing whether exceptional circumstances are present. One such identified circumstance was the "consequent difficulties in securing sustainable development without impinging on the Green Belt."</p> <p>4.39 The development of greenfield sites in areas of flood risk is inherently unsustainable given that it exacerbates the potential impacts of Climate Change and increases the risks to human life and property. Assuming that the development needs of the District could not be met on sustainable locations outside the Green Belt on land entirely within Flood Zone 1, then this would constitute an exceptional circumstance that would justify development in the Green Belt.</p> <p>4.40 In short, National Policy is clear in that development should be steered away from areas of high flood risk. Key reasons for this are to mitigate the potential impacts of Climate Change and minimise the risk to human life and property. The need to avoid areas of flood risk would be a contributing factor to justifying the release of Green Belt sites in sustainable locations.</p> <p>3. Protect and enhance ecological, landscape and heritage designations and their settings.</p> <p>4.41 Agree. The level of protection afforded should be proportionate to their relative significance, as dictated by the NPPF and relevant legislation. For all potential strategic allocations, the public benefits may need to be weighed against any harms through the Sustainability Appraisal process.</p> <p>4. Protect and enhance the function and connectivity of our Green Infrastructure and Nature Recovery Networks.</p> <p>4.42 Agree. As above, the level of protection afforded should be proportionate and appropriate to the significance of said asset. Proposals should also be considered on a holistic basis, with the net gains that could be facilitated through the loss of</p>	

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	<p>certain features that may be necessary to enable development to come forward.</p> <p>5. Plan for a better balance between local jobs and resident workers in our communities.</p> <p>4.43 Agree. The need to commute to and from work is unavoidable for many and this is often done by the private motor vehicle. Locating development in close proximity to areas with good access to existing employment centres and/or delivering employment alongside new residential development can help to promote the use of walking, cycling and Public Transport as an alternative to the private motor vehicle.</p> <p>4.44 There are also social benefits in achieving a good balance between local jobs and resident workers. Offering alternative (and cheaper) options to the private motor vehicle will improve accessibility to employment for many people, some of whom may not own a car. This can, in turn, combat unemployment and the financial hardship/poverty associated with it. It can also improve accessibility to education and extracurricular activities for both younger and older residents who may not be able or have a desire to use the private motor vehicle to access said opportunities.</p> <p>4.45 Given the importance of the North Bristol Fringe as an employment centre for the District, the Local Plan needs to consider how development which is well-related to it can come forward. Again, one may question the merits of strategic development at Buckover Garden Village in this context when many of its residents would likely need to travel to-from the North Bristol Fringe for both work and leisure.</p> <p>Development further South along the A38 corridor would be much better related to an existing employment base and would provide more convenient and viable alternatives to the private motor vehicle to accessing them.</p> <p>6. Ensuring that we protect a ‘sense of place and character’ when we plan for new development.</p> <p>4.46 We support this principle in the sense that the protection of place and character should be sought where the current sense of place and character is worth preserving. Opportunities to enhance, improve and create a new sense of place and character should also be explored where the context dictates.</p> <p>4.47 Whilst we agree with the guiding principles as a sound way in which to identify sustainable locations for growth, the absence of 'deliverability' as a principle is of some concern. As has been alluded to in the Phase 1 document, deliverability issues have led to the Council being unable to demonstrate a robust housing land supply in recent years. This has led to speculative development at many of the non-Green Belt towns and villages coming forward in recent years. Again, whilst this development is not fundamentally unsustainable in nature, it sits outside of an agreed framework which would most likely deliver more sustainable development in the round.</p>	

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	<p>4.48 Deliverability, or rather a failure to deliver the housing to meet the District's needs, also has significant social and economic consequences which we have touched on above and are considered in the latest SA.</p> <p>4.49 We accept that deliverability considerations may not be appropriate for the purposes of identifying potential locations for development. However, it should certainly form part of any site sifting exercise that may be undertaken, once these options have been identified.</p> <p>4.50 We would suggest a deliverability metric be applied to all options considered and those considered to be at significant risk of delivery, should be screened out at an appropriate stage.</p>	
Ellandi LLP On Behalf of Crestbridge Corporate Trustees Ltd and Crestbridge T...	Please refer to our answer to Question 7.	05 May 2021
Emma Jarvis	<p>Yes.</p> <p>The inland SSSI sites are missing off your diagram!</p> <p>Re principle 1. Transport times on any public transport to key facilities should also be a consideration in location. Measured during the rush hour when demand would be at its peak and also measured in terms of alternative options when a key route such as the M5 / A38 is compromised by e.g. an accident or maintenance closure.</p> <p>Re Principle 3 It is good that you have a principle that food and biodiversity are at the heart of all you do, this must go one step further in protecting our good quality agricultural land from development. A further diagram is required here which highlights the best and good agricultural land in the county. This needs to be protected so that the region and the country can provide and protect its own food supply now and for future generations. The good agricultural land is the most efficient and productive at doing this per square metre, it cannot be replaced.</p> <p>Re principle 4 Existing green Infrastructure zones and areas of visual importance in the landscape should be protected from large scale development.</p>	28 Feb 2021
F. Francis	See attached representations.	26 Apr 2021
Fiona Milden - Vistry Homes Limited	<p>Vistry Homes broadly supports the initial guiding principles for development. However, the Local Plan fails to rank the guiding principles by importance, which is necessary to guide the Spatial Strategy and the selection of sites in due course.</p> <p>It is important that the Local Plan establishes a clear framework against which development strategies and potential allocations can be assessed and where proposals are unable to comply with all guiding principles, the principles should be</p>	09 Mar 2021

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	<p>weighted in favour of the most important objectives of the Plan to determine the most suitable locations for development through the Local Plan. This issue was highlighted as an area of concern by the Inspectors for the West of England Joint Spatial Plan Examination in their letter of 11 September 2019, paragraph 8.</p> <p>In our opinion, the guiding principles should be ranked as follows:</p> <ol style="list-style-type: none"> 1. Locate new homes, jobs or settlements in places where key services and facilities are easily accessed by walking and cycling or effective Public Transport.... 2. Sequential approach to building on areas at a high risk of flooding. 3. Protect and enhance ecological, landscape and heritage designations and their settings. 4. Plan for a better balance between local jobs and resident workers in our communities. 5. Protect and enhance the function and connectivity of our Green Infrastructure.... 6. Ensuring that we protect a 'sense of place and character'.... 	
Gareth Fielding	<p>Housing, healthcare and education spaces are certainly all in demand and the high street seems an obvious location for this new development, due to its accessibility.</p> <p>Therefore, in locations where there is much uncertainty facing retail occupation, benchmarking values against residential and mixed-use development values should be a solution as change of use is likely to be the strategy that, in time, is employed.</p> <p>In pursuit of this strategy, the government has been assisting thorough reforms of the planning regime. The already announced Use Class E now groups retail along with offices, light industrial, research and development, clinics and some leisure uses, facilitating flexible change between these once disparately classified land uses.</p> <p>However, we are yet to see permitted development rights being extended to allow the full conversion of retail to residential, as we did with offices some years ago, and we expect further legislative assistance in support of this strategy to follow in due course.</p> <p>Greater development massing is also on the cards in locations that have the population density to support it, leading to higher buildings, greater land values and more public realm.</p> <p>Examples of this can be found in central Bristol where the council has consented to the development of numerous ten-storey plus blocks in what has traditionally been a four-to six storey retail location.</p> <p>Driving this demand for space is residential use, including private rental, student</p>	28 Feb 2021

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	<p>housing and even retirement living. The same trends can be seen around the greater London periphery.</p> <p>High street retail has not been the only part of the retail market to face occupational difficulties in recent months.</p> <p>Distress has also been seen in parts of the retail warehousing sector, although to a lesser extent than on the high street, partly due to the greater inherent robustness of bulky goods shopping against internet retail, as well as its generally lower reliance on public transport.</p> <p>But even though this sector has struggled, we should not be too hasty to completely write it off. Here, the similarities between retail warehousing construction and location and that of the burgeoning logistics sector can be of benefit making the physical conversion of use significantly easier.</p> <p>Facilitated by both planning legislation and realistic landlords, we expect to see a greater extent of mixed-use development in our city centres and because of this, greater diversity of residents with more employment prospects.</p> <p>Alongside all of this, there will of course still be retail property, but it will fulfil a new role in the operations of the industry as a returns hub or click and collect as well as its traditional function.</p>	
Gareth Jackson - Alder King	<p>We agree that development should be proposed in locations where key services and facilities are capable of being provided as part of the new development.</p> <p>In reality, allocations of varying scales will be required by the Local Plan in various forms as outlined in the guiding principle.</p> <p>Well planned growth can create exceptional places and must respond to the existing natural, built, historic and landscape assets, while enhancing the future character and distinctiveness of each unique area.</p>	19 Mar 2021
Gerrit Rollema	<p>Development MUST go hand in hand with infrastructure! - There are so many issues with current infrastructures (roads, public transport, etc etc) that any new and additional developments should only be built at the same time of significant improvements in infrastructure</p>	10 Dec 2020
Hannah Saunders - Dodington Parish Council	<p>Page 66 – INVESTIGATING THE GREEN BELT:</p> <ul style="list-style-type: none"> • While Members feel that any loss of Green Belt should be the last resort they feel that some sympathetic development could be advantageous under strict conditions (Also see comments on pages 113 - 136). <p>Page 72 – Green infrastructure and nature recovery networks:</p> <ul style="list-style-type: none"> • Members strongly support a holistic approach to these aspects. 	25 May 2021

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	<p>Page 72 – Balance between local jobs and resident workers:</p> <ul style="list-style-type: none"> • Members strongly support reducing need to travel for work and strongly support providing more, and more varied, local employment opportunities. 	
Hannick Homes	It is important that sustainable settlements in the rural area have sites identified for housing to ensure that the most sustainable strategy for future development is achieved.	25 Mar 2021
Heather Elgar - Woodland Trust	<p>We would like to see an explicit principle to embed green infrastructure from the earliest stages of all schemes and on landscape scale.</p> <p>We welcome 3. ‘protect and enhance ecological, landscape and heritage designations and their settings’ and 4. ‘protect and enhance the function and connectivity of our Green Infrastructure and Nature Recovery Networks’.</p>	12 Feb 2021
Helen Johnstone - Stroud District Council	<p>3. Protect and enhance ecological, landscape and heritage designations and their settings.</p> <p>SDC suggest that the accompanying diagram should show important ecological, heritage 'and landscape designations' and identify the Cotswolds Area of Natural Beauty (Cotswolds AONB) together with the features shown.</p>	26 Feb 2021
Housley	Lack of recognition of the impact of unplanned/speculative planning approvals that have been implemented in areas (Wickwar is of particular note for this issue) and follow-on impacts of development in areas where there are insufficient jobs to housing ratios to mitigate commuting is not covered in guiding principles. Development must consider the infrastructure required to ensure sustainability - through transport links and realistic access to facilities	19 Feb 2021
IM Land	<p>41. There is varied reference to building and sustaining communities, but we believe this should be a Guiding Principle in its own right. It may include matters such as describing what a walkable neighbourhood is and what land uses it may consist of? It should focus on social and health matters which any good development will address.</p> <p>42. Alternative modes of travel such as, e-bike and e-scooter should form part of Guiding Principle 1 given that they bridge the gap between a walkable neighbourhood and necessary wider travel for employment. IM Land is keen to see a Plan that makes the most of Bristol as the ‘Cycling City’ by offering an extension of this mode of travel into South Gloucestershire and enabling slightly longer distance journeys to become more convenient. When journey to work data is examined, settlements immediately around the Greater Bristol area are most likely to benefit from this. Likewise, it provides much more flexibility than either rail or bus which rely on set times and routes that do not always correspond with where and when people need to travel for work. The work provided in Appendix 2 of these representations provides greater detail on how modal shift could be delivered at Pucklechurch West.</p>	11 May 2021
IM Land Limited	Please see enclosed submission.	26 Mar 2021
Ivywell Capital	1. Locate new homes, jobs or settlements in places where key services and facilities	17 May

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(IC)	<p>are easily accessed by walking and cycling or effective Public Transport, or alternatively in locations where key services and facilities are capable of being provided as part of the new development.</p> <p>4.19 Agree. There are numerous benefits associated with locating development in places with either good existing access to services and facilities or the potential to make them accessible.</p> <p>4.20 This goes beyond the general imperative to reduce reliance on the private motor vehicle to combat Carbon emissions and Climate Change which is the obvious key benefit. Greater accessibility to said services and facilities helps combat other social and economic issues such as loneliness and unemployment, especially where the use of a private motor vehicle is not an option (e.g. for younger, older and disabled residents).</p> <p>4.21 Increased use of active modes of transport also supports healthier lifestyles and the closer people live to key services and facilities, the more attractive these options become. This is also true of Public Transport where more frequent and shorter journey times go hand in hand with increased usage. Again, this is likely to be achieved where development is located in close proximity to services, facilities and existing transport routes.</p> <p>4.22 The other advantage is that, where the private motor vehicle is used, journeys will typically be shorter and, therefore, emissions will be lower as a result.</p> <p>4.23 The application of this principle will generally (although not necessarily always) lead to the identification of the more sustainable locations of development and, as such, we support this as a guiding principle.</p> <p>2. Sequential approach to building on areas at a high risk of flooding.</p> <p>4.24 Agree. Paragraph 157 of the NPPF states that, "all Plans should apply a sequential, risk-based approach to the location of development – taking into account the current and future impacts of Climate Change so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:</p> <ul style="list-style-type: none"> a) Applying the sequential test and then, if necessary, the exception test as set out below; b) Safeguarding land from development that is required, or likely to be required, for current or future flood management; c) Using opportunities provided by new development to reduce the causes and impacts of flooding (where appropriate through the use of natural flood management techniques); and d) Where Climate Change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to 	2021

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	<p>relocate development, including housing, to more sustainable locations."</p> <p>4.25 Paragraph 158 of the NPPF follows this up by stating that "Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.... The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding."</p> <p>4.26 National Policy is clear in the importance of steering new development away from areas at risk of flooding. Indeed, paragraph 158 is clear in its directive that development should not be allocated or permitted where there are reasonably available sites in areas with a lower risk of flooding.</p> <p>4.27 This is not to say that development within areas at risk of flooding is always unacceptable and indeed there may be good reasons for doing so, say, where there are clear sustainability benefits or a lack of land in areas at lower risks of flooding. However, as a general principle, sites in Flood Zone 1 should take precedence over sites in Flood Zones 2 and 3 when it comes to identifying sites for development.</p> <p>4.28 When applying the sequential approach through the Local Plan process, we would stress that a site's Green Belt designation should not be something which dictates whether it is reasonably available or not. This is because the Local Plan process allows for revisions to Green Belt boundaries where there are exceptional circumstances for doing so.</p> <p>4.29 This is different to the very special circumstances that need to be demonstrated under the development management process in order to allow development in the Green Belt and that would otherwise allow a site to be discounted within any sequential assessment.</p> <p>4.30 Indeed, the need to avoid areas of flood risk can be a contributing factor to demonstrating the exceptional circumstances for releasing land from the Green Belt as there are sound environmental and social reasons for doing so. The judgment in the 2015 court case <i>Calverton Parish Council v Greater Nottingham Council & Others</i> (EWHC 1078) identifies five matters to consider when assessing whether exceptional circumstances are present. One such identified circumstance was the "consequent difficulties in securing sustainable development without impinging on the Green Belt."</p> <p>4.31 The development of greenfield sites in areas of flood risk is inherently unsustainable given that it exacerbates the potential impacts of Climate Change and increases the risks to human life and property. Assuming that the development needs of the District could not be met on sustainable locations outside the Green Belt on land entirely within Flood Zone 1, then this would constitute an exceptional circumstance that would justify development in the Green Belt.</p> <p>4.32 In short, National Policy is clear in that development should be steered away from areas of high flood risk. Key reasons for this are to mitigate the potential impacts of Climate Change and minimise the risk to human life and property. The</p>	

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	<p>need to avoid areas of flood risk would be a contributing factor to justifying the release of Green Belt sites in sustainable locations.</p> <p>3. Protect and enhance ecological, landscape and heritage designations and their settings.</p> <p>4.33 Agree. The level of protection afforded should be proportionate to their relative significance, as dictated by the NPPF and relevant legislation. For all potential strategic allocations, the public benefits may need to be weighed against any harms through the Sustainability Appraisal process.</p> <p>4. Protect and enhance the function and connectivity of our Green Infrastructure and Nature Recovery Networks.</p> <p>4.34 Agree. As above, the level of protection afforded should be proportionate and appropriate to the significance of said asset. Proposals should also be considered on a wholistic basis, with the net gains that could be facilitated through the loss of certain features that may be necessary to enable development to come forward.</p> <p>5. Plan for a better balance between local jobs and resident workers in our communities.</p> <p>4.35 Agree. The need to commute to and from work is unavoidable for many and this is often done by the private motor vehicle. Locating development in close proximity to areas with good access to existing employment centres and/or delivering employment alongside new residential development can help to promote the use of walking, cycling and Public Transport as an alternative to the private motor vehicle.</p> <p>4.36 There are also social benefits in achieving a good balance between local jobs and resident workers. Offering alternative (and cheaper) options to the private motor vehicle will improve accessibility to employment for many people, some of whom may not own a car.</p> <p>4.37 Inherently, development at certain rural villages would appear to run against this principle. However, this does not mean that development should not be directed towards villages where reliance on the private motor vehicle is likely to remain relatively high for the reasons set out above.</p> <p>4.38 Furthermore, there has been a significant shift in working and travel patterns as a result of the pandemic with many working from home on a permanent or semi-permanent basis. As such, the sustainability drawbacks to development at rural settlements have been slightly diminished, especially where digital connectivity is good.</p> <p>6. Ensuring that we protect a ‘sense of place and character’ when we plan for new development.</p> <p>4.39 We support this principle in the sense that the protection of place and character</p>	

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	<p>should be sought where the current sense of place and character is worth preserving. Opportunities to enhance, improve and create a new sense of place and character should also be explored where the context dictates.</p> <p>4.40 Whilst we agree with the guiding principles as a sound way in which to identify sustainable locations for growth, the absence of 'deliverability' as a principle is of some concern. As has been alluded to in the Phase 1 document, deliverability issues have led to the Council being unable to demonstrate a robust housing land supply in recent years. This has led to speculative development at many of the non-Green Belt towns and villages coming forward in recent years. Again, whilst this development is not fundamentally unsustainable in nature, it sits outside of an agreed framework which would most likely deliver more sustainable development in the round.</p> <p>4.41 Deliverability, or rather a failure to deliver the housing to meet the District's needs, also has significant social and economic consequences which we have touched on above and are considered in the latest SA.</p> <p>4.42 We accept that deliverability considerations may not be appropriate for the purposes of identifying potential locations for development. However, it should certainly form part of any site sifting exercise that may be undertaken, once these options have been identified.</p> <p>4.43 We would suggest a deliverability metric be applied to all options considered and those considered to be at significant risk of delivery, should be screened out at an appropriate stage.</p>	
James Carpenter - Falfield Parish Council	<p>Question 8:</p> <p>However, all Plans are only as good as the people who devise them and if there is contention in the ranks, there will be squabbles and infighting. A question to consider is ,,,,,,'When the makeup of the political parties in South Gloucestershire Council change through local elections, will this exercise have to start all over again, especially as this Consultation is to last through several phases?'</p> <p>Question 9:</p> <p>Yes.</p> <p>The Council must learn from the mistakes of the JSP and reconsider the location of the strategic sites.</p> <p>1. Transport times on any Public Transport to key facilities should also be a factor in considering location. It should be measured during the rush hour when demand would be at its peak. Transport must be interconnected across borders especially for trains to London etc.</p> <p>3.The inland SSSI sites are missing off the diagram, this is misleading. It is good that you have a principle that food and Biodiversity are at the heart of all you do.</p>	14 Apr 2021

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	<p>4. Agree with this principle. However, we note that the maps in the appendix of the WE Joint Green Infrastructure Strategy are appalling quality. They are difficult to zoom into to interpret and identify precise locations. This needs to be improved if it is to be used as a tool.</p> <p>Add new guiding principle or as part of 3. A further diagram is required here which highlights the best and good agricultural land in the County. This needs to be protected so that the region and the country can provide and protect its own food supply. The good agricultural land is the most efficient and productive at doing this per square metre. It is an important asset both for our generation and future generations that once lost cannot be replaced.</p>	
Jenny Raggett - Transport for New Homes	We re-iterate the importance of transit-orientated development as an important guiding principle as to where to build and don't see this yet in the draft text of the Plan. New railway stations, opportunities to extend mass transit and so on, are important in guiding where development should go. There needs to be optimism that new railway stations and mass transit can really be built. Otherwise without firm coordination between public transport provision and new-build, it will be road building and a drift away from the good policies on carbon and sustainability.	01 Mar 2021
John Acton	I think you have the most relevant principles covered, although I would probably have expressed them differently.	26 Mar 2021
John Brimacombe	Consideration for the local generation of green energy.	28 Feb 2021
John Mills - Cotswolds Conservation Board	<p>The Cotswolds Conservation Board broadly agrees with the initial guiding principles identified in the consultation document. In particular, we are pleased to see explicit reference to protecting and enhancing landscape designations and their settings. However, we are disappointed that the consultation document does not explicitly advocate a landscape-led approach to development in the Cotswolds National Landscape and its setting as a guiding principle.</p> <p>We recommend that South Gloucestershire Council should explicitly include this landscape-led approach as a guiding principle in the Local Plan.</p> <p>Further information on this landscape-led approach is provided in response to Question 5.</p>	16 Mar 2021
Jonathan Edwardes - Pilning and Severn Beach Parish Council	<p>We wish to see appropriate growth within our villages permitted, on an 'infill / replacement / previously developed basis.</p> <p>We welcome the proposal for a Local Housing Needs Assessment to inform any development proposals.</p> <p>We fully support the principle of 'duty to cooperate' and hope that this, together with working in partnership' and 'localism' will be explained to all departments of the council.</p> <p>We support the need for provision of more properties equipped to meet the needs of the elderly and disabled, as we predict that an LHNA will demonstrate an unmet need in this area.</p>	26 Feb 2021

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	<p>Walk to work. - The council must ensure that the walking route is possible/safe, i.e., that pavements in built-up areas are continuous, not obstructed by street furniture/signs/euro-bins. Dropped kerbs need to be in place for mobility users, and there must be a crack-down on pavement parking.</p> <p>Bus to work - essential that every bus stop has a safe place to stand, bus boarder kerb desirable, but more important is a bus shelter. The Council should set a target of providing 50% of stops with a shelter by 2026, the end of the plan period we believe.</p> <p>We agree with your comments regarding the ASEA sea wall improvements, and that this shouldn't be an excuse for development of the coastal zone. However, the communities within the coastal zone do need to be allowed evolutionary growth, extensions, infill, replacement, etc, otherwise they will stagnate. Depending on the outturn of the sea-level rise predictions, the next Local Plan after this may have to make plans for re-locating the coastal communities, if the promise to keep us protected proves too costly.</p> <p>You could introduce a building code for the coastal zone requiring all new build to be constructed to floodable standards.</p>	
Kate Kelliher	<p>Yes. People need space, such as green belt for their mental health and wellbeing. If we build thousands of houses in green belt, people will just go further out, as they will only be going into their Bristol office on one or two days a week. Southglos will not provide for their needs.</p> <p>Electric cars are going to be increasingly important. Only areas where an appropriate electricity grid will allow for fast charging will be where people want to live. Much of Southglos grid infrastructure is poor. Likewise our communications infrastructure for internet etc.</p>	31 Jan 2021
Kate Maskell	Feedback from residents in rural areas about potential development into their areas and the effect on the environment as well as flooding risk, road safety and noise pollution	22 Feb 2021
Katherine Buff	<p>See pages 67 to 73</p> <ul style="list-style-type: none"> • Any new settlements must be based around non car-based transport infrastructure only where it is either currently in place or where funding is irrevocably committed. • The need to preserve and not develop the land that is farming BMV Grades 1-3a in the region. • Plan for locations that are a genuine best fit with the priorities, not for planning convenience because a large tract of land has been offered during the call for sites. <p>South Gloucestershire's declared aim in its Local Plan is to encourage leisure activities which "enhance physical and mental well-being of both local people and visitors." Areas which provide quiet relaxation, walking, cycling, running and riding should be protected against speculative developments which result not onlt on the loss of landscape but an increase in traffic and congestion which would adversely impact these activities.</p>	26 Feb 2021

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Kevin Masters	I have read Trapp'd's response and wish to add my name to it.	25 Feb 2021
Kingdon	To not support developments despite an outcome of a planning rejection and overriding this. This should not happen!	25 Feb 2021
Laurence Parsons	The guiding principles appear to concentrate on the availability of the land itself, and not the views and needs of the existing population.	17 Dec 2020
Lauren Cook - Stride Treglown	UWE Bristol supports the six initial guiding principles that have been identified to help the Council's assessment of the suitability of different locations to accommodate new growth and help to meet the Council's priorities.	01 Mar 2021
Lee Taylor	Protection of green areas and avoidance of crowded housing developments Make sure your data is robust and system engineering is used to define requirements before you make decisions	23 Jan 2021
Lesley Brown	<p>1. Locate new homes, jobs, settlements in places where key services and facilities are easily accessed</p> <p>The existing DAPs and Transport tables are extremely inaccurate and give a completely false impression of where housing should go. THE DAPs AND TRANSPORT TABLES MUST BE CORRECTED BEFORE ANY DECISION IS MADE AS TO WHERE HOUSING SHOULD BE. THESE THEN NEED TO BE PUBLISHED BEFORE ANY DECISIONS ARE MADE. I have just looked at the areas I know ie. Winterbourne, Coalpit Heath, Frampton Cotterell and Thornbury. There are many mistakes. I am happy to share the correct information with you. I suspect that this is replicated across many areas and would be interested in know how the DAPs were compiled. Surely access to business rates information would have been useful.</p> <p>4. Protect and enhance the function and connectivity of our Green Infrastructure and nature recovery networks. I agree that it is good to protect these. I am puzzled as to why the Greenbelt opposite Roundways in Coalpit Heath is not shown on the map as it is well used by walkers and families.</p> <p>6. Ensuring that we protect a 'sense of place and character' when we plan for new development. I agree that any development needs to provide a positive addition in the way described although I feel it would be difficult to do this with large scale developments. I would point out here that the Blackberry Park Development of Park Lane and the Woodlands Farm current development have been included in the Frampton Cotterell DAP when it in fact is within the Coalpit Heath boundary. This makes it look as though we have had far less development than we have. There has been a large amount of development in our area increasing the use of our facilities but this is not recognised inthe DAP due to this error.</p>	15 Feb 2021
Lizzie Staley	Where people can truly walk to the local conveniences and services. This includes elderly and families' ability to get to them. This is not "as the crow flies". Or you would be adding 1000s of extra car journeys resulting in carbon emissions and congestion.	28 Feb 2021

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	<p>Concerning Thornbury, Kington and Oldbury:</p> <p>Protect the farm land as it is rich in wildlife. It is also good quality farming with lower emissions and lower strain on the environment as it is organic. This should be encouraged over high intensity farming that strips the land and increases CO2 emissions. If the farm land in the Call for sites is used, it will also harm the farm land and green areas next to it, causing wildlife to disappear and pushing people to overcrowd the fields and footpaths on their exercise out of the town, which puts livelihoods at risk and damages the land and natural habitats.</p> <p>The lanes are not fit for the amount of traffic, especially that cutting through to the motorway. Many dangerous spots are steep and single track. Already there are problems with speeding vehicles and people who don't want to reverse or pull in next to hedges. The roads get eroded especially badly where springs and streams run across fields and out on the road. This would increase with houses on top. How would heavy vehicles get there? What destruction would happen for their access?</p> <p>People's lives and livelihoods are being affected by the traffic as they can't walk, cycle or ride their horses safely. It is a great danger to the elderly and for families as they take children and babies out for exercise or to get to buy things in the village. They can't jump into a ditch or hedge fast enough. The national cycle routes through the area could end up with many incidents.</p> <p>Pollution: The lanes and public footpaths through Kington and Oldbury have had a big increase of litter in the last few years. Oldbury dog bins are overflowing with poo from Thornbury dog walkers. Oldbury residents have to pay for more bins and more regular emptying. There is also more not in the bins, rather hanging from bushes or just on the ground.</p> <p>Noise pollution from vehicles speeding through the lanes to cut through to the motorway and for some, to use as a rally track.</p> <p>Light pollution affecting wildlife.</p> <p>Small areas of woodland, ponds and streams are in the proposed sites and many areas are directly next to the sites. This would disrupt habitats and move animals away with the noise, air pollution, light pollution and damage to ecosystems. Especially when being developed.</p> <p>Some of the animals we have seen and heard on and next to the land include deer, muntjacs, badgers, foxes, owls, bats, skylarks, kestrels, buzzards, a kite, rooks, ravens, woodpeckers, stonechats, flocks of linnets, swallows, herons, mallards, goldfinches , toads, glowworms.</p> <p>Protection for listed buildings: The Castle will be neighbours to hundreds of houses. Will helicopters landing there be an issue to the houses? Conygre Covert is where rabbits were bread for the castle and still woodland,</p>	

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	<p>however it will be directly next to development. Kington House is listed grade 3 and will be near to development.</p> <p>Flooding: Flooding regularly occurs around Kington and the Parkmill farm site. The roads flood enough to prevent cars going through and having to turn back. This would increase drastically with the fields and trees covered over. It would then cause terrible traffic problems. Ice is also causing crashes on the lanes. More so now that more people leave early for their commutes to work and return later in the evening.</p>	
Lorna Gould	There is an area around established villages which contains long standing development but is not allowed to infill like the rest of the village as it has been segregated by a settlement boundary. The current settlement boundaries are not based on any methodology known to south glos council and should be reviewed.	28 Feb 2021
Louise Powell - Thornbury Town Council	The Town Council is concerned that any review of the Green Belt should be holistic. It should not just be used as an opportunity to increase housing allocations but should ensure that all development respects the intrinsic character of the area rather than create 'urban sprawl'. Any Green Belt removed should be replaced elsewhere.	08 Apr 2021
Mactaggart & Mickel - Frampton Cotterell	N/A.	07 Apr 2021
Mactaggart & Mickel Homes England Ltd	<p>See attached representations.</p> <p>3.17 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>3.18 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 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>3.19 Guiding principle no's 3, 4 and 6 relate to the natural and historic environment, green infrastructure/nature recovery and sense of place and character.</p>	05 May 2021

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	All of these principles should explicitly recognise the potential role of new development in enhancing and strengthening these principles as opposed to simply seeing them as constraints that require protection from new development.	
Mactaggart & Mickel - Pilning	N/A.	25 Mar 2021
Marian Gilpin	<p>Maintaining the character of villages is important but this does not mean imitating the style and size of C18 cottages. Sympathetic new designs should be considered.</p> <p>Planning regulations should always now include air source heat pumps, a south-facing roof with the maximum possible number of solar panels (not just the token 4) and a much higher level of insulation in the roofs.</p>	09 Feb 2021
Martyn Hall	Same as above you need to look at all buildings unused	26 Feb 2021
Matt Griffith - Business West	<p>33. Regarding investigating the Green Belt: We warmly support the open approach that the document is taking to the Green Belt, including the evaluation of Green Belt options in Appendix 1. We believe that a revision of the Green Belt is not only needed, but urgent if the new Local Plan wants to ensure South Gloucestershire addresses the sustainability challenges for the region.</p> <p>34. We in particular welcome the recognition and proactivity in the Local Plan document to recognise that Green Belt policy is relatively narrowly conceived as a land use policy and not one that has any inherent landscape or ecological quality, and that these important considerations can be, and are, protected by other, better targeted policies and interventions (page 37).</p> <p>35. We are of the view that maintenance of the Green Belt unchanged creates negative and undesirable consequences – including unsustainable patterns of travel and commuting and pressures on the towns and settlements that lie outside the Green Belt, which are not necessarily the best places for larger scale development.</p> <p>36. Given the extent of the Green Belt alongside constraints arising from the management of natural assets and processes (including for flooding and areas of importance for their natural or environmental assets) and the extent of housing need and housing pressures, this means a Green Belt review is likely to be necessary. We welcome the Local Plan recognition that this is the point at which it should happen (page 37) within the Plan making process.</p> <p>37. We believe in the importance that this is done with a wider set of criteria and objectives in mind – not just focusing on a narrow interpretation of Green Belt functions, but also how sites can best contribute to wider environmental, landscape, transport and sustainability objectives.</p> <p>38. Unless this approach is taken, it is highly likely that South Gloucestershire will fail to meet its wider aims and objectives and not be able to tackle the challenges that this Local Plan sets out.</p> <p>o Given that the Green Belt covers 42% of South Gloucestershire, the existing</p>	25 Mar 2021

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	<p>housing and land pressures that neighbouring Authorities that the City of Bristol and Bath & North Somerset suffer, the shortage of Brownfield land to cover the regions' needs, plus the development constraints that the Cotswolds Area of Outstanding Natural Beauty and Flood risk areas pose – we believe that South Gloucestershire has arguments and evidence to support a Green Belt revision.</p> <p>39. It is therefore highly important that the next stage of the Plan making process sets out clearly the procedure to be followed for dealing with the Green Belt, including its relationship to a Sustainability Appraisal, transport evidence and the Local Plans broader objectives, to make sure the new Plan can be found to be sound when examined independently.</p> <p>40. Encouragingly, there are positive examples of Green Belt reviews happening in other parts of the country, which South Gloucestershire can learn from, and which can help you most effectively meet the challenges that this document clearly sets out.</p> <p>41. One example is the Cambridge experience of Green Belt review and release which prioritised meeting housing needs in a way that prioritised transport infrastructure, services and the needs of local communities. We would be very happy to help contribute to a discussion on national lessons from Green Belt, spatial growth and achieving sustainable development, if this would be helpful for the next stage of Plan making.</p> <p>42. Regarding development in Flood Risk Zones: Flood Risk is well covered in this Local Plan in the issues and key planning designations and considerations sections. We are in complete agreement that careful consideration should be taken for Flood Risk Zones 2 and 3[2], mainly in the Severn Estuary, and further development in these areas can be challenging from a sustainability point of view. Nevertheless, as outlined in the Local Plan, current settlements in these zones need specific support to face their contextual obstacles, and can also attract interesting investment opportunities that cannot be ruled out.</p> <p>43. We are pleased to read that as part of the Avonmouth Severnside Enterprise Area (ASEA) Ecology Mitigation and Flood Defence Scheme work to upgrade the existing flood defences will begin soon, and the recognition that this scheme does not increase, rather maintain, the current level of flood risk in the area. Thus, further tests and mitigation will be needed to consider housing development but should be acceptable for employment and commercial one (pg.129).</p> <p>44. We call on the Council to evaluate the growth needs and set up a plan for future flood defences across all Flood Risk Zones 2 and 3. This is particularly important when considering the Bristol Free Port Bid which could bring a considerable amount of investment to the area. It is imperative to examine how to protect the current and future infrastructure and settlements around the Severn Estuary.</p> <p>[2] Which cover 29% and 22% of South Gloucestershire respectively (Pg. 31).</p>	
Matthew Blaken - DJ&P	See 3 above and the importance of fully considering the opportunities within rural villages as growth opportunities subject to high quality design and not preventative	14 Dec 2020

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Newland Rennie Ltd	methods seeking to retain as a museum to the past.	
Matthew McCollom	Guiding principle 1 about location of new homes is important, but the Covid-19 pandemic has changed many working practices and many employers now recognise the benefits of having their employees working remotely. Guiding principle 6. The green belt surrounding the village of Shortwood ensures that the village is able to retain its individual character and separate identity. Any development in such a small community must be proportionate to the size of the community.	28 Feb 2021
Maurice Wayne	May I suggest In many rural areas water and electricity was not installed until the 1960's and as a result in many cases do not have the capacity to support further expansion. Foul drainage again in rural areas particularly on the higher Cotswold areas is usually by septic tanks, unfortunately the out crops of limestone rock can limit expansion. Single track winding narrow lanes to many linear villages are also a further limit to expansion.	08 Feb 2021
Mel Clinton - Nash Partnership	Potential guiding principles: Provision for sustainable living and working, which accommodates a variety of household types and lifestyles requires a diverse spatial pattern and this is reflected in the suggested building blocks, which range from growth of existing urban areas to development in and around rural villages and settlements. However, to embed this is suggested that an additional principal is added: A Diverse, Sustainable and Resilient Settlement Pattern 'To achieve a diverse, polycentric spatial pattern of development, where residential neighbourhoods have access to central facilities at a range of scales from urban to rural, to accommodate community needs and provide a variety of lifestyle opportunities.' Delivery of the proposed principles and objectives for the Local Plan is the key challenge. This can be assisted and supported by identification of sites to deliver exemplar developments, in terms of social, economic and environmental objectives, to set a standard, disrupt market conventions and help demonstrate what is achievable. It is therefore suggested that a further principal is added under the existing heading on exceptional places and spaces: Creating Exceptional Places and Spaces 'Identify sites for and enable the delivery of exemplar developments to set a high standard, disrupt market conventions and help demonstrate what is achievable in terms of the Local Plan's social, economic and environmental objectives.'	01 Mar 2021
Melinda Evans	Locations that require no further sacrifice of open space/Nature Recovery Networks/Grade 2 agricultural land/Flood risk 3-3b. Where access to essential services and employment if not served by dedicated walking and cycling paths, is achievable through existing or guaranteed, energy efficient, attractive public transport. Locations requiring private cars or speculative infrastructure should be rejected. It is not appropriate to propose new road building to improve access to proposed	01 Mar 2021

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	developments, road building is not compatible with the declared Climate Emergency (Transport Engineering 101: building more roads just results in more cars filling them). This is in acknowledgement that even with the phasing out of the ICE, car usage will also have to decrease in order to meet emission reduction targets.	
Michelle Greaves	Look fair good principles	03 Feb 2021
Midland Commercial	<p>Please see enclosed submission.</p> <p>4.27 Once again it will be important to consider the sub regional SDS in respect of the guiding principles that the new Local Plan will need to reflect, although we welcome the initial ideas presented by the Council in the current consultation document. Within that context, our clients welcome the broad approach to:</p> <p>“Locate new homes, jobs or settlements in places where key services and facilities are easily accessed by walking and cycling or effective Public Transport, or alternatively in locations where key services and facilities are capable of being provided as part of the new development.”</p> <p>4.28 In looking at this in more detail it will be important to reflect the needs of the SDS, the emerging evidence base in respect of employment land as required by the NPPF and PPG, and the deliverability of particular locations having regard to market signals. We would suggest that these points are incorporated into future guiding principles.</p>	26 Apr 2021
Mike Bennewitz	Please see answer to Point 7.	23 Feb 2021
Miller	Affordable homes need to be reconsidered in location and the requirements for occupancy. Whilst I understand many have a genuine need for housing In some cases more often than not the system is abused. These house must also not be forced upon new private developments. I personally have worked hard and recently purchased a £500,000 new home only to look out at affordable (free or as near as) being abused by low life’s who should and could do more. Their homes are stacked with new televisions, kids playing on playstations and sky dishes. If they can afford those things they can afford to rent privately.	01 Dec 2020
Mr. A. D. England	<p>Please see enclosed submission.</p> <p>Guiding Principles:</p> <p>5.13 The enclosed Masterplanning Document broadly summarises how the development of land at Almondsbury would positively respond to the Council’s Guiding Principles.</p>	29 Mar 2021
Mr. and Mrs. Griffiths	We agree that large scale growth locations need to be sustainable to avoid increasing issues that contribute to Climate Change, particularly through increasing a reliance on private car journeys to access key services and facilities. Everyday needs, such as key services and facilities including employment and education, should be provided for within the development, or available in close proximity, so	30 Mar 2021

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	that they can be accessed by walking or cycling and, if travel is required, by effective Public Transport.	
Mr. Blake - Oldland Parish Council	Look after OAP's	17 Feb 2021
Neil Oviatt	<p>I disagree you should further build outside Thornbury ; This has already happened and is continuing to happen. PLEASE PLEASE! Did you walk the roads of Thornbury before producing this document! over 2000 houses already making Thornbury a lopsided town (all traffic goes in the same direction) further extension will make it far worse. There is no infrastructure for greater development!</p> <p>Why do planners not legally bind developers to build schools, hospitals, roads before taking their profit from the residential... this would show true commitment.</p>	30 Nov 2020
Newland Homes - Land at Aust Road	<p>4.19 Our comments on the six guiding principles are listed below:</p> <p>1. Locate new homes, jobs or settlements in places where key services and facilities are easily accessed by walking and cycling or effective Public Transport, or alternatively in locations where key services and facilities are capable of being provided as part of the new development.</p> <p>4.20 Agree. There are numerous benefits associated with locating development in places with either good existing access to services and facilities or the potential to make them accessible.</p> <p>4.21 This goes beyond the general imperative to reduce reliance on the private motor vehicle to combat Carbon emissions and Climate Change which is the obvious key benefit. Greater accessibility to said services and facilities helps combat other social and economic issues such as loneliness and unemployment, especially where the use of a private motor vehicle is not an option (e.g. for younger, older and disabled residents).</p> <p>4.22 Increased use of active modes of transport also supports healthier lifestyles and the closer people live to key services and facilities, the more attractive these options become. This is also true of Public Transport where more frequent and shorter journey times go hand in hand with increased usage. Again, this is likely to be achieved where development is located in close proximity to services, facilities and existing transport routes.</p> <p>4.23 The other advantage is that, where the private motor vehicle is used, journeys will typically be shorter and, therefore, emissions will be lower as a result.</p> <p>4.24 The application of this principle will generally (although not necessarily always) lead to the identification of the more sustainable locations of development and, as such, we support this as a guiding principle.</p> <p>2. Sequential approach to building on areas at a high risk of flooding.</p> <p>4.25 Agree. Paragraph 157 of the NPPF states that, "all Plans should apply a</p>	14 May 2021

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	<p>sequential, risk-based approach to the location of development – taking into account the current and future impacts of Climate Change so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:</p> <p>a) Applying the sequential test and then, if necessary, the exception test as set out below;</p> <p>b) Safeguarding land from development that is required, or likely to be required, for current or future flood management;</p> <p>c) Using opportunities provided by new development to reduce the causes and impacts of flooding (where appropriate through the use of natural flood management techniques); and</p> <p>d) Where Climate Change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations."</p> <p>4.26 Paragraph 158 of the NPPF follows this up by stating that "Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.... The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding."</p> <p>4.27 National Policy is clear in the importance of steering new development away from areas at risk of flooding. Indeed, paragraph 158 is clear in its directive that development should not be allocated or permitted where there are reasonably available sites in areas with a lower risk of flooding.</p> <p>4.28 This is not to say that development within areas at risk of flooding is always unacceptable and indeed there may be good reasons for doing so, say, where there are clear sustainability benefits or a lack of land in areas at lower risks of flooding. However, as a general principle, sites in Flood Zone 1 should take precedence over sites in Flood Zones 2 and 3 when it comes to identifying sites for development.</p> <p>4.29 When applying the sequential approach through the Local Plan process, we would stress that a site's Green Belt designation should not be something which dictates whether it is reasonably available or not. This is because the Local Plan process allows for revisions to Green Belt boundaries where there are exceptional circumstances for doing so.</p> <p>4.30 This is different to the very special circumstances that need to be demonstrated under the development management process in order to allow development in the Green Belt and that would otherwise allow a site to be discounted within any sequential assessment.</p> <p>4.31 Indeed, the need to avoid areas of flood risk can be a contributing factor to demonstrating the exceptional circumstances for releasing land from the Green Belt</p>	

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	<p>as there are sound environmental and social reasons for doing so. The judgment in the 2015 court case Calverton Parish Council v Greater Nottingham Council & Others (EWHC 1078) identifies five matters to consider when assessing whether exceptional circumstances are present. One such identified circumstance was the "consequent difficulties in securing sustainable development without impinging on the Green Belt."</p> <p>4.32 The development of greenfield sites in areas of flood risk is inherently unsustainable given that it exacerbates the potential impacts of Climate Change and increases the risks to human life and property. Assuming that the development needs of the District could not be met on sustainable locations outside the Green Belt on land entirely within Flood Zone 1, then this would constitute an exceptional circumstance that would justify development in the Green Belt.</p> <p>4.33 In short, National Policy is clear in that development should be steered away from areas of high flood risk. Key reasons for this are to mitigate the potential impacts of Climate Change and minimise the risk to human life and property. The need to avoid areas of flood risk would be a contributing factor to justifying the release of Green Belt sites in sustainable locations.</p> <p>3. Protect and enhance ecological, landscape and heritage designations and their settings.</p> <p>4.34 Agree. The level of protection afforded should be proportionate to their relative significance, as dictated by the NPPF and relevant legislation. For all potential strategic allocations, the public benefits may need to be weighed against any harms through the Sustainability Appraisal process.</p> <p>4. Protect and enhance the function and connectivity of our Green Infrastructure and Nature Recovery Networks.</p> <p>4.35 Agree. As above, the level of protection afforded should be proportionate and appropriate to the significance of said asset. Proposals should also be considered on a holistic basis, with the net gains that could be facilitated through the loss of certain features that may be necessary to enable development to come forward.</p> <p>5. Plan for a better balance between local jobs and resident workers in our communities.</p> <p>4.36 Agree. The need to commute to and from work is unavoidable for many and this is often done by the private motor vehicle. Locating development in close proximity to areas with good access to existing employment centres and/or delivering employment alongside new residential development can help to promote the use of walking, cycling and Public Transport as an alternative to the private motor vehicle.</p> <p>4.37 There are also social benefits in achieving a good balance between local jobs and resident workers. Offering alternative (and cheaper) options to the private motor vehicle will improve accessibility to employment for many people, some of</p>	

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	<p>whom may not own a car.</p> <p>4.38 Intuitively, development at certain rural villages would appear to run against this principle. However, this does not mean that development should not be directed towards villages where reliance on the private motor vehicle is likely to remain relatively high for the reasons set out above.</p> <p>4.39 Furthermore, there has been a significant shift in working and travel patterns as a result of the pandemic with many working from home on a permanent or semi-permanent basis. As such, the sustainability drawbacks to development at rural settlements have been slightly diminished, especially where digital connectivity is good.</p> <p>6. Ensuring that we protect a ‘sense of place and character’ when we plan for new development.</p> <p>4.40 We support this principle in the sense that the protection of place and character should be sought where the current sense of place and character is worth preserving. Opportunities to enhance, improve and create a new sense of place and character should also be explored where the context dictates.</p> <p>Do you think we have missed any key, initial guiding principles?</p> <p>4.41 Whilst we agree with the guiding principles as a sound way in which to identify sustainable locations for growth, the absence of 'deliverability' as a principle is of some concern. As has been alluded to in the Phase 1 document, deliverability issues have led to the Council being unable to demonstrate a robust housing land supply in recent years. This has led to speculative development at many of the non-Green Belt towns and villages coming forward in recent years. Again, whilst this development is not fundamentally unsustainable in nature, it sits outside of an agreed framework which would most likely deliver more sustainable development in the round.</p> <p>4.42 Deliverability, or rather a failure to deliver the housing to meet the District's needs, also has significant social and economic consequences which we have touched on above and are considered in the latest SA.</p> <p>4.43 We accept that deliverability considerations may not be appropriate for the purposes of identifying potential locations for development. However, it should certainly form part of any site sifting exercise that may be undertaken, once these options have been identified.</p> <p>4.44 We would suggest a deliverability metric be applied to all options considered and those considered to be at significant risk of delivery, should be screened out at an appropriate stage.</p>	
Newland Homes - Land West of The B4061 Bristol Road	<p>4.18 Our comments on the six guiding principles are listed below:</p> <p>1. Locate new homes, jobs or settlements in places where key services and facilities are easily accessed by walking and cycling or effective Public Transport, or</p>	13 May 2021

Respondent Name	User Response: Text	Response Created
	<p>alternatively in locations where key services and facilities are capable of being provided as part of the new development.</p> <p>4.19 Agree. There are numerous benefits associated with locating development in places with either good existing access to services and facilities or the potential to make them accessible.</p> <p>4.20 This goes beyond the general imperative to reduce reliance on the private motor vehicle to combat Carbon emissions and Climate Change which is the obvious key benefit. Greater accessibility to said services and facilities helps combat other social and economic issues such as loneliness and unemployment, especially where the use of a private motor vehicle is not an option (e.g. for younger, older and disabled residents).</p> <p>4.21 Increased use of active modes of transport also supports healthier lifestyles and the closer people live to key services and facilities, the more attractive these options become. This is also true of Public Transport where more frequent and shorter journey times go hand in hand with increased usage. Again, this is likely to be achieved where development is located in close proximity to services, facilities and existing transport routes.</p> <p>4.22 The other advantage is that, where the private motor vehicle is used, journeys will typically be shorter and, therefore, emissions will be lower as a result.</p> <p>4.23 The application of this principle will generally (although not necessarily always) lead to the identification of the more sustainable locations of development and, as such, we support this as a guiding principle.</p> <p>2. Sequential approach to building on areas at a high risk of flooding.</p> <p>4.24 Agree. Paragraph 157 of the NPPF states that, "all Plans should apply a sequential, risk-based approach to the location of development – taking into account the current and future impacts of Climate Change so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:</p> <ul style="list-style-type: none"> a) Applying the sequential test and then, if necessary, the exception test as set out below; b) Safeguarding land from development that is required, or likely to be required, for current or future flood management; c) Using opportunities provided by new development to reduce the causes and impacts of flooding (where appropriate through the use of natural flood management techniques); and d) Where Climate Change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations." 	

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	<p>4.25 Paragraph 158 of the NPPF follows this up by stating that "Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.... The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding."</p> <p>4.26 National Policy is clear in the importance of steering new development away from areas at risk of flooding. Indeed, paragraph 158 is clear in its directive that development should not be allocated or permitted where there are reasonably available sites in areas with a lower risk of flooding.</p> <p>4.27 This is not to say that development within areas at risk of flooding is always unacceptable and indeed there may be good reasons for doing so, say, where there are clear sustainability benefits or a lack of land in areas at lower risks of flooding. However, as a general principle, sites in Flood Zone 1 should take precedence over sites in Flood Zones 2 and 3 when it comes to identifying sites for development.</p> <p>4.28 When applying the sequential approach through the Local Plan process, we would stress that a site's Green Belt designation should not be something which dictates whether it is reasonably available or not. This is because the Local Plan process allows for revisions to Green Belt boundaries where there are exceptional circumstances for doing so.</p> <p>4.29 This is different to the very special circumstances that need to be demonstrated under the development management process in order to allow development in the Green Belt and that would otherwise allow a site to be discounted within any sequential assessment.</p> <p>4.30 Indeed, the need to avoid areas of flood risk can be a contributing factor to demonstrating the exceptional circumstances for releasing land from the Green Belt as there are sound environmental and social reasons for doing so. The judgment in the 2015 court case <i>Calverton Parish Council v Greater Nottingham Council & Others</i> (EWHC 1078) identifies five matters to consider when assessing whether exceptional circumstances are present. One such identified circumstance was the "consequent difficulties in securing sustainable development without impinging on the Green Belt."</p> <p>4.31 The development of greenfield sites in areas of flood risk is inherently unsustainable given that it exacerbates the potential impacts of Climate Change and increases the risks to human life and property. Assuming that the development needs of the District could not be met on sustainable locations outside the Green Belt on land entirely within Flood Zone 1, then this would constitute an exceptional circumstance that would justify development in the Green Belt.</p> <p>4.32 In short, National Policy is clear in that development should be steered away from areas of high flood risk. Key reasons for this are to mitigate the potential impacts of Climate Change and minimise the risk to human life and property. The need to avoid areas of flood risk would be a contributing factor to justifying the</p>	

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	<p>release of Green Belt sites in sustainable locations.</p> <p>3. Protect and enhance ecological, landscape and heritage designations and their settings.</p> <p>4.33 Agree. The level of protection afforded should be proportionate to their relative significance, as dictated by the NPPF and relevant legislation. For all potential strategic allocations, the public benefits may need to be weighed against any harms through the Sustainability Appraisal process.</p> <p>4. Protect and enhance the function and connectivity of our Green Infrastructure and Nature Recovery Networks.</p> <p>4.34 Agree. As above, the level of protection afforded should be proportionate and appropriate to the significance of said asset. Proposals should also be considered on a holistic basis, with the net gains that could be facilitated through the loss of certain features that may be necessary to enable development to come forward.</p> <p>5. Plan for a better balance between local jobs and resident workers in our communities.</p> <p>4.35 Agree. The need to commute to and from work is unavoidable for many and this is often done by the private motor vehicle. Locating development in close proximity to areas with good access to existing employment centres and/or delivering employment alongside new residential development can help to promote the use of walking, cycling and Public Transport as an alternative to the private motor vehicle.</p> <p>4.36 There are also social benefits in achieving a good balance between local jobs and resident workers. Offering alternative (and cheaper) options to the private motor vehicle will improve accessibility to employment for many people, some of whom may not own a car.</p> <p>4.37 Intuitively, development at certain rural villages would appear to run against this principle. However, this does not mean that development should not be directed towards villages where reliance on the private motor vehicle is likely to remain relatively high for the reasons set out above.</p> <p>4.38 Furthermore, there has been a significant shift in working and travel patterns as a result of the pandemic with many working from home on a permanent or semi-permanent basis. As such, the sustainability drawbacks to development at rural settlements have been slightly diminished, especially where digital connectivity is good.</p> <p>6. Ensuring that we protect a ‘sense of place and character’ when we plan for new development.</p> <p>4.39 We support this principle in the sense that the protection of place and character should be sought where the current sense of place and character is worth</p>	

Respondent Name	User Response: Text	Response Created
	<p>preserving. Opportunities to enhance, improve and create a new sense of place and character should also be explored where the context dictates.</p> <p>Do you think we have missed any key, initial guiding principles?</p> <p>4.40 Whilst we agree with the guiding principles as a sound way in which to identify sustainable locations for growth, the absence of 'deliverability' as a principle is of some concern. As has been alluded to in the Phase 1 document, deliverability issues have led to the Council being unable to demonstrate a robust housing land supply in recent years. This has led to speculative development at many of the non-Green Belt towns and villages coming forward in recent years. Again, whilst this development is not fundamentally unsustainable in nature, it sits outside of an agreed framework which would most likely deliver more sustainable development in the round.</p> <p>4.41 Deliverability, or rather a failure to deliver the housing to meet the District's needs, also has significant social and economic consequences which we have touched on above and are considered in the latest SA.</p> <p>4.42 We accept that deliverability considerations may not be appropriate for the purposes of identifying potential locations for development. However, it should certainly form part of any site sifting exercise that may be undertaken, once these options have been identified.</p> <p>4.43 We would suggest a deliverability metric be applied to all options considered and those considered to be at significant risk of delivery, should be screened out at an appropriate stage.</p>	
Nicholas Small - Stagecoach West	<p>Please refer to the larger response submitted alongside this one.</p> <p>As the rest of our response will make abundantly clear, the guiding principles are inadequate in one crucial respect. To a very great extent they have been used over Decades, but have failed on their own to support anything other than highly car-dependent patterns of movement and travel behaviour.</p> <p>This is because successive development strategies have always failed to anchor the spatial pattern of development on existing and deliverable high quality Public Transport corridors, and supporting transport strategies and Plan-related mitigations have primarily been driven by a “predict and provide” approach, which retrofits transport interventions to the Plan. We need not repeat this again at length.</p>	01 Mar 2021
Nick Hudson	To state that you will not carry on with the same broken system and ways of thinking	15 Jan 2021
Nick Woodward	<p>Rural communities have their right to maintain their historic character and heritage. Locations requiring no further sacrifice of greenfield sites and where access to essential services and employment if not already served by dedicated walking and cycling paths should be achievable through existing or guaranteed emerging energy efficient public transport solutions.</p> <p>Locations requiring the use of private cars or speculative infrastructure should always be rejected</p>	28 Feb 2021

Respondent Name	User Response: Text	Response Created
Nicola Flack	I'm not convinced that major employers are going to wish to set up on a small site in S Glos, particularly given the new normal, post pandemic business landscape. This needs much more research and evaluation over the next year before any conclusions should be drawn.	31 Jan 2021
Nicola Jordan	Areas that do not sacrifice more green belt or build on flood plain. Areas that require over reliance on private car , destroy heritage, negatively impact on wildlife should be rejected.	25 Feb 2021
Nicola O'Connell	Existing urban and brownfield sites and not greenbelt development	27 Feb 2021
P. Church	See attached representations.	27 Apr 2021
Patrick Williams	<p>Not so much missed, but the idea of even contemplating building on Zone 1 and 2 Flood plain, shows a complete disregard for the residents where this is now the case. The public experience every year some major flooding in towns around the UK. This has to stop. It has to be remembered that some of this land, such as the area I live, has only had the risk of flooding increased because of poor building plans in the past recent Decades. Any thought that the Environment Agency being able to offer protection by temporary fences is incorrect. These issues are only likely to increase as Climate Changes occur, so these areas need protection not development.</p> <p>COVID-19 has shown how people need countryside, as a Chipping Sodbury resident I have seen a dramatic increase in the use of local footpaths in 2020. Tearing up countryside has a damaging effect on local populations. Fundamentally it has to be remembered people living in Rural and Market Town locations do so because they do not want to live in Urban developments, or see the environment they live in turned into an urban one, so this has to be respected.</p>	09 Mar 2021
Paula Evans - Rangeworthy Parish Council	This question is too ambiguous to provide a response from a layman's perspective. It requires specialist knowledge of sociology, demographics and Town & Country Planning.	26 Feb 2021
Pauline and Richard Wilson	See above answers	25 Feb 2021
Paul Randall	See comments on vacant office space above	16 Feb 2021
Persimmon Homes Severn Valley	<p>Please see attached document.</p> <p>5. Developing a growth Strategy: potential guiding principles (Section 5):</p> <p>5.1 This section of the Plan seeks to identify six guiding principles for assessing the suitability of different locations to accommodate new growth. We recognise that these are “initial ideas” and would offer what we hope to be constructive comments of the principles that have been identified.</p> <p>Guiding Principle 1: Locate new homes, jobs or settlements in places where key services and facilities are easily accessed by walking and cycling or effective</p>	11 May 2021

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	<p>Public Transport, or alternatively in locations where key services and facilities are capable of being provided as part of the new development.</p> <p>5.2 We support this principal as being key to the consideration and assessment of alternative locations for accommodating growth. Indeed, such an approach lies at the heart of those Buildings Blocks aimed at optimising opportunities within urban areas as well as sustainable growth around the market towns.</p> <p>5.3 We note, however, that much of the commentary on this guiding principle is focussed on entirely new services and facilities provided as part of a development including the statement “... the larger the scale of growth proposed, the more local services and facilities, including opportunities for local employment would be expected to be provided.”</p> <p>5.4 Whilst we do not disagree with such a statement, the Plan should also highlight the desirability of locating development where it is accessible to existing services and facilities which can be more sustainable than having to provide entirely new facilities. The Plan should also reference the fact that new development can benefit and support existing services and facilities, both directly and indirectly, including through increased patronage.</p> <p>5.5 Finally we note and support the Diagram on page 68 “Accessing Services and Facilities” which demonstrates the high levels of connectivity of Chipping Sodbury/Yate.</p> <p>Guiding Principle 2: Sequential approach to building on areas at a high risk of flooding.</p> <p>5.6 This principle is supported not least because it effectively repeats National Policy Guidance. However, we believe that it should acknowledge that, in some cases, only a small part of a much larger site may be affected by flood issues and therefore, with appropriate design (i.e. avoiding areas that may be prone to flooding) and appropriate mitigation, such sites should not be prevented from coming forward for development.</p> <p>5.7 We further suggest that this principle should acknowledge that new development can have significant benefits for existing properties that are already subject to flooding. For example, work undertaken in support of the land at East Chipping Sodbury, in association with the Environment Agency, has concluded that the development of the site offers the opportunity to reduce existing flooding in Chipping Sodbury including properties on St. John’s Way. This is entirely consistent with National Planning Policy which states that Local Planning Authorities should use:</p> <p>“Opportunities provided by new development to reduce the causes and impacts of flooding (where appropriate through the use of natural flood management techniques)...” (NPPF para 157 (c)).</p> <p>Guiding Principle 3: Protect and enhance ecological, landscape and heritage</p>	

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	<p>designations and their settings.</p> <p>5.8 We support the aspiration of this Guiding Principle.</p> <p>Guiding Principle 4: Protect and enhance the function and connectivity of our Green Infrastructure and Nature Recovery Networks.</p> <p>5.9 We generally support the aspirations of this Guiding Principle.</p> <p>Guiding Principle 5: Plan for a better balance between local jobs and resident workers in our communities.</p> <p>5.10 We support the aspiration of this Guiding Principle which also enforces the need to identify locations for new homes which have access, including by cycling, walking and Public Transport, to employment opportunities. As stated previously, this supports the allocation of land at East Chipping Sodbury.</p> <p>Guiding Principle 6: Ensuring that we protect a ‘sense of place and character’ when we plan for new development.</p> <p>5.11 We support the aspiration of this Guiding Principle. Land at East Chipping Sodbury offers the opportunity for a high quality new residential area that integrates well with the existing community as well as accessing and supporting existing services in the Town and in Yate. Further, and notwithstanding the physical connectivity of the Town with Yate, development at East of Chipping Sodbury will ensure the retention of the historic character of Chipping Sodbury.</p>	
Peter Box	For the country in general and South Gloucestershire in particular, to stand a chance of meeting Climate Change targets, New Developments (housing) MUST be sited in order to minimise commuter travel: i.e. adjacent to existing transport networks AND developments of new Business Parks or Enterprise Zones. In the original WECA JSP these new 'Job Centres' were concentrated within the Bath, Bristol and Weston Super Mare triangle: i.e. not within South Gloucestershire at all.	23 Feb 2021
Peter Rawlinson - Gleeson Strategic Land	<p>The guiding principles need to consider the change in lifestyle and travel to work patterns that have accelerated over the last year due to Covid-19. A larger number of people are now able to work from home and have become used to using online shopping and home delivery services. These all reduce the need to travel by private car through a fundamental lifestyle shift. This has the potential to reduce travel by private car by a significant amount; potentially more so than improving Public Transport connections and services because a large number of people will still choose to use their car when they need to travel for the convenience and flexibility private car travel provides.</p> <p>This change in lifestyles could also have significant positive benefits to small local businesses in the villages and rural communities. Existing and new residents working from home are now able to make more use of local shops, cafes, facilities etc. because they are now local more often, compared to having to travel long distances to urban areas where places of employment are located. The guiding principles should therefore allow for the potential for new housing to be developed</p>	10 Mar 2021

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	<p>in areas that may not have excellent Public Transport connections but could support the general day to day needs of new residents using a combination of local services and facilities and delivery services. The change to working from home essentially delivers the benefits of placing housing near employment without having to develop a mixed-use community. Whilst home working is not compatible for every job it will have an overall positive impact to the use of private cars.</p>	
Phil Saunders - Safeagent	<p>Firms are required, at the request of the complainant, to refer the complaint to a redress scheme once their in-house procedure has been exhausted. They are also required to comply with any award determined by the redress scheme, within the timescale prescribed. Under co-regulation schemes, safeagent has undertaken to review any complaints that have been adjudicated upon by any of the redress schemes. Under such an arrangement, safeagent can report to the Council on the number of complaints reaching this stage and on the adjudications made. Non-compliance with a redress scheme's adjudication would eventually lead to disqualification of the agent from safeagent. We would be happy to come to a similar arrangement with South Gloucestershire. CONCLUSION It seems to us that many of the issues raised in the report highlight how important it is for landlords to work with reputable agents such as safeagent members. safeagent would welcome a collaborative approach with South Gloucestershire Council, based on shared objectives. We believe that agents who are members of a recognised body are more likely to embrace improvement initiatives and less likely to generate complaints or regulatory breaches. As a result, the Council would experience reduced administration and compliance costs and further measures such as Article 4 Directions may not be necessary. CONTACT DETAILS safeagent Cheltenham Office Park Hatherley Lane Cheltenham GL51 6SH Tel: 01242 581712 Email: info@safeagentcheme.co.uk APPENDIX 1 – COMPATIBILITY OF SAFEAGENT SERVICE STANDARDS WITH TYPICAL SCHEME CONDITIONS Example Scheme Conditions SAFEAGENT Service Standard Requirements Fees SAFEAGENT promotes complete transparency in agency fees. Members provide landlords with a statement of account as often as agreed. Rent Liabilities and Payments SAFEAGENT agents collect the rent and pass it on every month or as otherwise agreed. The agent will keep a separate clients' account to hold all monies. Contact Details SAFEAGENT agents are expected to respond to tenant and other legitimate enquiries in a timely manner. Up to date contact details will enable them to respond to tenants' requests for maintenance or repairs which might in some cases have to be referred to the landlord for approval. State of Repair SAFEAGENT agents visit the property with landlords 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 be confident that SAFEAGENT agents have provided advice to the landlord concerning any repairs or refurbishments which are necessary. Access and Possession arrangements SAFEAGENT agents will visit the property periodically during the course of the tenancy as often as agreed with the landlord. Tenants will be fully aware of access arrangements. 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. Repairs and Maintenance 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. Access, Cleaning and Maintenance of Common</p>	26 Feb 2021

Respondent Name	User Response: Text	Response Created
	<p>Parts SAFEAGENT agents will arrange in advance a time for access to the property in order to inspect the condition of the property in accordance with the tenancy agreement. Level of Facilities SAFEAGENT agents ensure that tenants are provided with copies of safety certificates on gas and electrical appliances before you commit to the tenancy. They 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. Deposits SAFEAGENT agents provide and fill in a tenancy agreement and take a deposit to protect against possible damage. They will explain the basis on which it is being held and the purpose for which it is required. References SAFEAGENT agents choose a tenant in a way agreed with the landlord, taking up references or checking the tenant's rent payment record. Complaints & Dispute Handling SAFEAGENT agents 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. During the tenancy, they will arrange to check the condition of the property and draw up a schedule to outline any deductions to be made from the tenant's initial deposit. They will return the deposit as soon as possible, less any appropriate deductions.</p>	
Progress Land Ltd	<p>The first section provides commentary on investigating the Green Belt and states:</p> <p>However, in line with national guidance, 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.</p> <p>Whilst the list is comprehensive in our view and includes the premise of using or providing services to reduce car use, avoiding flood areas and protecting the environment, it does not appear to include the above statement as a guiding principle.</p> <p>In our view if there is an opportunity to provide a sustainable garden village on non-Green Belt land which accords with the guiding principles set out then this should take priority over release of Green Belt land. As a result, whether to release Green Belt land or not should come after considering all other options and this should therefore be a growth strategy to make the Plan sound. If after review, there are no other options then Green Belt could be considered.</p> <p>Principle 4 (p. 71) indicates Green Infrastructure and nature. The land to the West of the A38 and North East of Thornbury should be considered as an area for growth and appropriate green infrastructure allocated around development to provide connectivity.</p>	11 May 2021
R. Brown	<p>1. Locate new homes, jobs, settlements in places where key services & facilities are easily accessed</p> <p>The existing DAPs & transport details are inaccurate. The use of this data would result in new housing being in the wrong areas thus causing more problems of overstretched facilities and poorer living conditions. This information must be accurately researched and the correct and up to date details thus providing good supporting information. Having looked at the information for Winterbourne,</p>	25 Feb 2021

Respondent Name	User Response: Text	Response Created
	<p>Frampton Cotterll Coalpit Heath and Thornbury there are many mistakes. If this is typical of the accuracy of the information on which the local plan is based it is unlikely to result in a good outcome.</p> <p>4 Protect & enhance the function & connectivity of our green infrastructure & nature recovery networks It is good to protect these. However again the information on the maps is lacking. The area opposite Roundways in Coalpit Heath is not shown on the map. I have seen the area used by many walkers and families over the years.</p> <p>Ensuring we protect a 'sense of place & character' when we plan for new developments I agree but this will be difficult with any large scale development. The Frampton Cotterall DAP includes Woodlands Farm and Blackberry Park developments which are actually in Coalpit Heath. Another misleading mistake. Again this needs to be corrected.</p>	
Rachel Beard	<p>Yes. There should be a guiding principle not to build on flood plain areas, greenbelt sites and sites of historic interest. Currently all three of these points are totally disregarded by the list of prosed development sites included in the plan.</p>	28 Feb 2021
Rebecca Woodward	<p>Once destroyed, green field sites can never be recovered. Rural communities have the right to maintain their character and heritage. Not everyone wants to live in densely populated areas. Development must be sustainable and supported.</p>	28 Feb 2021
Redcliffe Homes	<p>No comment.</p>	04 Mar 2021
Redcliffe Homes	<p>Please see enclosed representations.</p>	01 Jun 2021
Redrow Homes (SW)	<p>Please see enclosed representations.</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 Bull - Environment Agency	<p>We would like to provide a more detailed approach to integrated catchment management, spatial planning, planning policy and future projects in time for the next phase of this consultation. For all allocated and windfall sites within SGC, we would like the opportunity to develop with SGC a set of rules developers would have to follow for their Applications to be considered. Please find below examples. These rules would enhance the quality of the proposal and would drive the development to be more environmentally friendly:</p> <p>No urban extension should take place in Flood Zone 2 and 3.</p>	13 Apr 2021

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	<p>If an urban extension site includes a small area of Flood Zone 2 and 3, all development should be:</p> <ul style="list-style-type: none"> - Limited to Flood Zone 1 areas. - Have a wildlife corridor enhancing Biodiversity and the environment alongside main rivers and Flood Zone 2, to be provided for 8m from the edge of Flood Zone 2 into Flood Zone 1 where no development is allowed except for surface water attenuation and play areas. - Minimum Finished Floor Levels (FFL) for dwellings should be raised 300mm above 1 in 100 year flood level, with appropriate allowance for Climate Change. - De-culverting of watercourses should be encouraged. - No culverting of watercourses unless required for access. - Safe access to the site should be provided for all flood events. <p>Town centre sites in Flood Zone 2 and 3:</p> <ul style="list-style-type: none"> - Only Brownfield sites should be allowed. - Compensate for the loss of floodplain and Climate Change impact. - Minimum FFL for dwellings should be raised 300mm above 1 in 100 year flood level with appropriate allowance for Climate Change. - De-culverting of watercourses should be encouraged. - No culverting of watercourses unless required for access. - Safe access to the site should be provided for all flood event. <p>However, SGC have indicated that new locations for large scale growth may need to consider development in Green Belt and rural villages and settlements, which may be in Flood Zone 2 or 3.</p> <p>We would still expect the sequential testing of buildings out of areas at high risk of flooding (build within FZ1). Therefore, it would be an opportunity for SGC and EA to consider strategic flood risk of proposed locations based on more up to date modelling (ASEA and Severn House Farm) to see how best the Sequential Test is applied. We would advise that SGC emerging SFRA is available for developers to consider as part of their ST planning.</p> <p>Section 35 states that with the impact of Covid-19 on retail and leisure, the Local Plan needs to consider how to repurpose town centres and High Streets. If this results in change of use of existing premises to residential areas, this may provide alternative reuse of existing Brownfield sites that are likely to be already located in</p>	

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	lower flood risk areas and perhaps should be the preferred option when considered alongside proposed development in areas that may be difficult to achieve the sequential test.	
Richard Lloyd	The list of guiding principles looks comprehensive: the principles are supported. In relation to Green Infrastructure, the area marked 4 on the map would appear to cover the Cotswolds AONB. The Cotswolds AONB is one of a family of AONBs (now called National Landscapes) and there needs to be a consistency of policy across the whole AONB. See comments on the Cotswolds AONB in Question 15.	03 Mar 2021
Richard Pendlebury - Anchor Society	No	22 Feb 2021
Robert Harris - Olveston Parish Council	The identified list of initial guiding principles seems to have encapsulated the current situation and needs and are therefore supported. The list must however, be regularly reviewed in order to ensure that they remain fit for purpose as circumstances develop.	26 Feb 2021
Robert Hitchins Ltd	Please see enclosed submission.	01 Jun 2021
Robert Hitchins Ltd and Harrow Estates PLC	Please see enclosed submission.	01 Jun 2021
Robert Keen - Elms NHW	Infrastructure - public transport, cycling and walking need more emphasis	23 Feb 2021
Robin Perry	See answer to 7. Currently it appears we build first and subsequently try to resolve the lack of services and infrastructure caused by that development. This is totally a wrong approach. Development should only go where infrastructure and services have been created to support that development.	21 Feb 2021
Robin Winfield	Yes. Villages need protecting from being swamped by new building of houses.	19 Feb 2021
Roger Hall	See TRAPP'D response.	25 Feb 2021
Rosalyn Pyle	No	28 Feb 2021
Roy Irwin	The document talks of scale being important in order to support enhanced public service infrastructure. This may be the hypothesis but it is hard to see any evidence that public service investment (other than roads, and even they are not always adopted by SGS in new developments) is connected to a specific development. There have been hundreds of homes built in Thornbury in the past 5 years. What infrastructure has followed on from this? SGS should set up an account for each location where development of scale (say over 50 homes/commercial properties) is planned so that the broader benefits are explained and delivered to those communities most affected by the development.	01 Mar 2021

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Ruth Hall - Wessex Water	Guiding principle 2 identifies the need to consider flood risk. Flood risk considerations should include areas of high groundwater, please see comments above under Building Block 4.	02 Mar 2021
Sarah Blackmore	The DAPs and Sustainable Transport Charts need to be thoroughly investigated and checked and verified to ensure they are fit for purpose before they can be used to make any decisions on where housing should be built. We also believe that comparative retail sites should still be included in the DAPs as many services such as opticians, solicitors, restaurants, etc. would entail more car use if these facilities are not present in an area. Public transport often isn't convenient for appointment times for these facilities.	08 Dec 2020
Sarah Blackmore - VALID Action Group	<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>Sustainable transport charts:</p> <p>Having looked at these charts it appears that they also suffer from numerous errors. According to the planners, Winterbourne has no buses reaching Bristol City Centre within an hour. This is simply not true. Having looked at the First Bus timetable we note that Winterbourne currently has 25 return buses, all but one is in the light green category of 16 - 30minute journey time. The first return journey bus starts at 5.41 and the last at 22.37.</p> <p>Thornbury is tabled as having no buses to the City Centre/Bus station within an hour. Again, I have checked the First Bus timetable and they have 42 return buses starting at Thornbury Rock Street (there are other stops in Thornbury) and these begin at 5.17 with the last being 22.33. Of these 24 are in the yellow zone (31 - 45 mins) and 18 in the red, 46 mins - 1 hour category.</p> <p>Coalpit Heath is said to have a service to Filton and has been listed as the yellow 31 -45 minute zone. However, having looked at the timetable, the quickest journey is 43 minutes and the longest 1 hour 23 minutes. The majority are around the 57 minute mark and many involve 2 buses (1 also involves a train). Many of them involve a walk of about 15 minutes both to the initial bus stop and another 15 minute walk to the destination. This might be suitable for occasional use but would be unlikely to be used as a daily commute.</p>	26 Feb 2021
Sarah Raymond	Green belt should not be an option	25 Feb 2021
Sean and Jacqueline Rinaldi	<ul style="list-style-type: none"> Any new settlements must be based around non car-based transport infrastructure only where it is either currently in place or where funding is irrevocably committed. Plan for locations that are a genuine best fit with the priorities, not for planning 	26 Mar 2021

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	convenience because a large tract of land has been offered during the Call for Sites.	
Simon Moore	<p>These are not set out in the document referred to above so I don't know if these are right - but the guiding principles should be:</p> <ol style="list-style-type: none"> 1. To rebuild our degraded natural environment. 2. Prevent any further development on agricultural land. 3. Target a zero carbon future for the county by a specific date. 	28 Feb 2021
Simon Steele-Perkins - Waddeton Park Limited	<p>The guiding principles could hardly be otherwise as these are all reflections of national planning policy.</p> <p>We support these provided they are used in determining the location and form of development, but not in seeking to reduce the amount of provision below what the demographic and economic evidence shows is needed for the future communities of the District as part of a wider and connected functional area.</p> <p>We are a little wary of the sequential approach to flood risk as this suggests that there are some circumstances in which the increased risk of flooding arising from development would be put aside. This is dubious in terms of public health and safety and seems to be at odds with all of the Council's sound words on adaptation to the consequences of Climate Change.</p> <p>6.1.1 As well as making provision for all of the identified housing needs to be met, the Local Plan must ensure that a supply of housing flows steadily throughout the Plan period, and that there is always a five-year supply of genuinely deliverable housing sites. Whilst the consultation envisages very large sites being a necessary part of the provision to make up the numbers, it also acknowledges the well-established empirical evidence that large sites have long lead times and may have lower sales rates. Large sites require more infrastructure to be provided from scratch, and ensuring the infrastructure is in place when early stage residents expect it to be available raises viability and hence planning issues.</p> <p>6.1.2 Medium sized sites clearly have a significant part to play in getting the mix right – neither too large to have the problems above, nor too small to achieve community benefits or to make an impact on the overall needs – they meet the Goldilocks test. Our expectation however, is that the Council will have the choice of relatively few medium sized sites in its area that are well related to existing communities and facilities and which are genuinely available and deliverable from the outset.</p> <p>6.1.3 In moving forward from the consultation, the Council should be clear that:</p> <ul style="list-style-type: none"> • It will be particularly seeking to identify available medium sized sites that are predictably deliverable especially in the early stages of the Plan period, and which support existing community infrastructure and promote its continued enhancement. 	06 May 2021
Sophia Rees - B N P Paribas Real Estate	Further depth on greentbelt review.	01 Mar 2021
Sophie Spencer -	Locations that require no further sacrifice of green land and where access to	02 Mar

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CPRE Avon and Bristol [South Gloucestershire District]	essential services and employment if not served by dedicated walking and cycling paths, is achievable through existing or guaranteed, energy efficient, attractive public transport. Locations requiring private cars or speculative infrastructure should be rejected.	2021
Sophie Wainwright - South Glos Disability Equality Network	<p>- Sufficient and accessible public toilets should be incorporated into plans for new/existing developments; changing places toilets incorporated into new public Council venues.</p> <p>- Community cohesion/hubs should be encouraged in any new or significantly expanded areas.</p>	13 Apr 2021
South West Strategic Developments (SWSD)	<p>Please see enclosed representations.</p> <p>8.10 We agree with the initial guided principles set out but would like to raise a couple of points which require clarification as part of the next stage of the Plan:</p> <ul style="list-style-type: none"> • We agree with guiding principle number 1, which requires development to be placed in sustainable locations. However, it also states ‘alternatively in locations where key services and facilities are capable of being provided as part of the new development’ – we would like SGC to clarify that any supporting infrastructure required is achievable and viable, without significant funding gaps. This was a key issue identified through the JSP for Buckover and Charfield and we urge the Authorities not to rely too heavily on Central Government funding to support infrastructure projects that may not come to fruition. • We support the protection and enhancement of ecological, landscape and heritage designations and their settings. However, we would like clarification that this does not necessarily include the Green Belt, primarily as we consider the Green Belt should be reviewed and land allocated for development on the edge of Bristol to contribute to sustainable transport goals. <p>Do you think we have missed any key, initial guiding principles?</p> <p>8.11 We do not consider that any initial guiding principles have been missed.</p>	31 Mar 2021
St. Modwen Developments and The Tortworth Estate	<p>The proposed approach of using the presence of overarching constraints (including flood risk, Green Belt, heritage, ecology) and proximity to key connections/ services, or where existing connections can be easily enhanced to guide development, appears to be logical and generally in accordance with national guidance. As noted within our answer to Q1, the Green Belt should only be developed if the Council’s (or any required growth from Bristol) development needs cannot be met once all other reasonable options have been explored, as per the NPPF. Even where proximity to connections and services may perform well, consideration must also be given to the ability of existing infrastructure to accommodate development, noting for example the inherent infrastructure capacity and constraints within the Bristol North Fringe.</p> <p>As demonstrated by our Call for Sites Submission, new development at Buckover would align with these guiding principles as the site is not in the Green Belt, it has no overarching constraints and there is potential for a network of sustainable</p>	05 Mar 2021

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	connections to the surrounding area, including cycleways and extensions to existing bus routes.	
Stephen Hickmans	Brown field sites should be uppermost priority	26 Jan 2021
Steven Freke	<p>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.</p> <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>	27 Feb 2021
Steve Seward	<p>key principles should focus on recognising that only sympathetic redevelopment of existing structures and new remote settlements may be the only options remaining, avoiding the over population of already heavily populated areas and the protection of villages and their immediate surrounding countryside.... Its knowing when to declare there is no more available space.</p> <p>Green Belt zones were introduced to protect certain areas from becoming over developed.</p> <p>This is the key point – if Green Belt is ignored and lost forever then developed, this is an obvious indicator that strategic decision principles ignore the fact that we will and are rapidly running out of space and therefore strong resistance to any national targets and compulsory development should be promoted.</p> <p>Green Belt must remain in place forever.</p>	13 Feb 2021
Strongvox Homes	<p>4.15 Our comments on the six guiding principles are listed below:</p> <p>1. Locate new homes, jobs or settlements in places where key services and facilities are easily accessed by walking and cycling or effective Public Transport, or alternatively in locations where key services and facilities are capable of being provided as part of the new development.</p> <p>4.16 Agree. There are numerous benefits associated with locating development in places with either good existing access to services and facilities or the potential to make them accessible.</p> <p>4.17 This goes beyond the general imperative to reduce reliance on the private motor vehicle to combat Carbon emissions and Climate Change which is the obvious key benefit. Greater accessibility to said services and facilities helps combat other social and economic issues such as loneliness and unemployment, especially where the use of a private motor vehicle is not an option (e.g. for younger, older and disabled residents).</p>	11 May 2021

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	<p>4.18 Increased use of active modes of transport also supports healthier lifestyles and the closer people live to key services and facilities, the more attractive these options become. This is also true of Public Transport where more frequent and shorter journey times go hand in hand with increased usage. Again, this is likely to be achieved where development is located in close proximity to services, facilities and existing transport routes.</p> <p>4.19 The other advantage is that, where the private motor vehicle is used, journeys will typically be shorter and, therefore, emissions will be lower as a result.</p> <p>4.20 The application of this principle will generally (although not necessarily always) lead to the identification of the more sustainable locations of development and, as such, we support this as a guiding principle.</p> <p>2. Sequential approach to building on areas at a high risk of flooding.</p> <p>4.21 Agree. Paragraph 157 of the NPPF states that, "all Plans should apply a sequential, risk-based approach to the location of development – taking into account the current and future impacts of Climate Change so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:</p> <ul style="list-style-type: none"> a) Applying the sequential test and then, if necessary, the exception test as set out below; b) Safeguarding land from development that is required, or likely to be required, for current or future flood management; c) Using opportunities provided by new development to reduce the causes and impacts of flooding (where appropriate through the use of natural flood management techniques); and d) Where Climate Change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations." <p>4.22 Paragraph 158 of the NPPF follows this up by stating that "Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.... The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding."</p> <p>4.23 National Policy is clear in the importance of steering new development away from areas at risk of flooding. Indeed, paragraph 158 is clear in its directive that development should not be allocated or permitted where there are reasonably available sites in areas with a lower risk of flooding.</p> <p>4.24 This is not to say that development within areas at risk of flooding is always unacceptable and indeed there may be good reasons for doing so, say, where there</p> 	

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	<p>are clear sustainability benefits or a lack of land in areas at lower risks of flooding. However, as a general principle, sites in Flood Zone 1 should take precedence over sites in Flood Zones 2 and 3 when it comes to identifying sites for development.</p> <p>4.25 When applying the sequential approach through the Local Plan process, we would stress that a site's Green Belt designation should not be something which dictates whether it is reasonably available or not. This is because the Local Plan process allows for revisions to Green Belt boundaries where there are exceptional circumstances for doing so.</p> <p>4.26 This is different to the very special circumstances that need to be demonstrated under the development management process in order to allow development in the Green Belt and that would otherwise allow a site to be discounted within any sequential assessment.</p> <p>4.27 Indeed, the need to avoid areas of flood risk can be a contributing factor to demonstrating the exceptional circumstances for releasing land from the Green Belt as there are sound environmental and social reasons for doing so. The judgment in the 2015 court case <i>Calverton Parish Council v Greater Nottingham Council & Others</i> (EWHC 1078) identifies five matters to consider when assessing whether exceptional circumstances are present. One such identified circumstance was the "consequent difficulties in securing sustainable development without impinging on the Green Belt."</p> <p>4.28 The development of greenfield sites in areas of flood risk is inherently unsustainable given that it exacerbates the potential impacts of Climate Change and increases the risks to human life and property. Assuming that the development needs of the District could not be met on sustainable locations outside the Green Belt on land entirely within Flood Zone 1, then this would constitute an exceptional circumstance that would justify development in the Green Belt.</p> <p>4.29 In short, National Policy is clear in that development should be steered away from areas of high flood risk. Key reasons for this are to mitigate the potential impacts of Climate Change and minimise the risk to human life and property. The need to avoid areas of flood risk would be a contributing factor to justifying the release of Green Belt sites in sustainable locations.</p> <p>3. Protect and enhance ecological, landscape and heritage designations and their settings.</p> <p>4.30 Agree. The level of protection afforded should be proportionate to their relative significance, as dictated by the NPPF and relevant legislation. For all potential strategic allocations, the public benefits may need to be weighed against any harms through the Sustainability Appraisal process.</p> <p>4. Protect and enhance the function and connectivity of our Green Infrastructure and Nature Recovery Networks.</p> <p>4.31 Agree. As above, the level of protection afforded should be proportionate and</p>	

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	<p>appropriate to the significance of said asset. Proposals should also be considered on a wholistic basis, with the net gains that could be facilitated through the loss of certain features that may be necessary to enable development to come forward.</p> <p>5. Plan for a better balance between local jobs and resident workers in our communities.</p> <p>4.32 Agree. The need to commute to and from work is unavoidable for many and this is often done by the private motor vehicle. Locating development in close proximity to areas with good access to existing employment centres and/or delivering employment alongside new residential development can help to promote the use of walking, cycling and Public Transport as an alternative to the private motor vehicle.</p> <p>4.33 There are also social benefits in achieving a good balance between local jobs and resident workers. Offering alternative (and cheaper) options to the private motor vehicle will improve accessibility to employment for many people, some of whom may not own a car. This can, in turn, combat unemployment and the financial hardship/poverty associated with it. It can also improve accessibility to education and extracurricular activities for both younger and older residents who may not be able or have a desire to use the private motor vehicle to access said opportunities.</p> <p>4.34 Again, this makes development at Yate in general, and specifically development to the North/West of Yate, a particularly sustainable option as it benefits from an strong employment base as well as Public Transport access to other key areas (e.g. Bristol and its urban fringes).</p> <p>6. Ensuring that we protect a ‘sense of place and character’ when we plan for new development.</p> <p>4.35 We support this principle in the sense that the protection of place and character should be sought where the current sense of place and character is worth preserving. Opportunities to enhance, improve and create a new sense of place and character should also be explored where the context dictates.</p> <p>Do you think we have missed any key, initial guiding principles?</p> <p>4.36 Whilst we agree with the guiding principles as a sound way in which to identify sustainable locations for growth, the absence of 'deliverability' as a principle is of some concern. As has been alluded to in the Phase 1 document, deliverability issues have led to the Council being unable to demonstrate a robust housing land supply in recent years. This has led to speculative development at many of the non-Green Belt towns and villages coming forward in recent years. Again, whilst this development is not fundamentally unsustainable in nature, it sits outside of an agreed framework which would most likely deliver more sustainable development in the round.</p> <p>4.37 Deliverability, or rather a failure to deliver the housing to meet the District's</p>	

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	<p>needs, also has significant social and economic consequences which we have touched on above and are considered in the latest SA.</p> <p>4.38 We accept that deliverability considerations may not be appropriate for the purposes of identifying potential locations for development. However, it should certainly form part of any site sifting exercise that may be undertaken, once these options have been identified.</p> <p>4.39 We would suggest a deliverability metric be applied to all options considered and those considered to be at significant risk of delivery, should be screened out at an appropriate stage.</p>	
Sue Green - Home Builders Federation	The HBF have no comments on the Council's 6 potential guiding principles identified as (1) Locate new homes, jobs or settlements in places where key services and facilities are easily accessed or are capable of being provided, (2) Sequential approach to building on areas at a high risk of flooding, (3) Protect & enhance ecological, landscape & heritage designations & their settings, (4) Protect & enhance the connectivity of Green Infrastructure & Nature Recovery Networks, (5) Plan for a better balance between local jobs & resident workers and (6) Protect a "sense of place and character" when planning new development.	05 Mar 2021
Sue Hope	Good to see Climate Emergency issues addressed, however these must hold priority in all future development.	26 Feb 2021
Sue Simmons - Westerleigh Parish Council	<p>As stated above – there should be guiding principles that develop where it is wanted not where it not and will have a negative impact on a rural village or settlement without reason.</p> <p>The principle of "A village or hamlet should remain a village or hamlet" should be respected.</p>	23 Feb 2021
Susan Smith	No	16 Feb 2021
Swanmoor Stoke Ltd	<p>See above.</p> <p>Potential Guiding Principles:</p> <p>7.6 SSL recognise the concept of applying the six guiding principles which could help inform the development of a new growth strategy. However, it is important that these principles are considered in the context of planned and committed investment, including the realistic prospect of largescale delivery at Severnside Economic Area generally, but also the Westgate area as well which will significantly increase the level of development on the Eastern side of the M49 around the new Motorway Junction. This will also provide further opportunities for connectivity with Severnside.</p> <p>7.7 Similarly, the approach to flood risk sequential assessment is recognised, but this should be applied in an appropriate context of delivering wider sustainability objectives. This is recognised, to an extent, in terms of meeting the needs of the existing settlements within areas of flood risk. However, it does not consider the strategic context of Severnside and wider infrastructure provision, where extensive</p>	06 Apr 2021

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	<p>additional economic development is already planned and will come forward over the Plan period. SSL consider that the only tension between proposals at Swanmoor Stoke and the building blocks set out is the prospect of interpreting the approach to the Flood Risk Sequential Test too narrowly. The approach set out at Appendix 2 includes a reasonable application of the Test, including a range of case studies setting out practical examples of it. SSL would welcome further discussion on this matter moving forward.</p> <p>7.8 Flood resilience and safety of development proposals are also important matters, alongside the sequential test, in considering the acceptability of locations such as Swanmoor Stoke. These are matters which have been considered from the outset and provide comfort that future residents will not be at risk from flooding. This also relates to Building Block 4 which promotes the enhancement and protection of the function and connectivity of Green Infrastructure, including Blue Infrastructure. SSL are supportive of this approach and have developed a strategy to deliver a useable network of Blue and Green Infrastructure to enhance the recreational, social and environmental credentials of the scheme, facilitated by the delivery of the new community. An important component of this is flood attenuation, which will be incorporated to protect against the risk of flooding.</p> <p>7.9 SSL recognise the importance of planning for a better balance between local jobs and resident workers (Guiding Principle 5). Taking account of even modest growth at Severnside, there is nowhere in the region where this issue will be more acute. If the full extent of projected job growth in the area is realised this comparison can be extended to an almost national level (i.e. the job to resident worker density ratio will be comparable to urban locations such as Westminster and regional city CBDs). This issue is considered in more detail at Appendix 3. It is considered that a Spatial Strategy which fails to recognise and address the imbalance of jobs to residents, particularly at Severnside, could struggle to address a range of strategic sustainability objectives in practice. It is a cornerstone of a sound approach to the Spatial Strategy.</p>	
Taylor Wimpey UK Ltd - Land at Mangotsfield	<p>Guiding Principles:</p> <p>Six guiding principles are set out that the document explains will be used to help assess the suitability of potential development locations. The principles are generally acceptable and based on reasonable priorities such as protecting designated sites and taking a sequential approach to land at risk of flooding. However, we would question how the Council will be making the assessments of each principle when deciding whether or not a site should be allocated for development. There is a danger that blanket application of binary criteria could exclude sites that may, when viewed holistically, be the most sustainable locations for development. For example, if part of a large site is within Flood Zone 3 or in the setting of a heritage asset would this mean the whole site is excluded, regardless of any consideration as to whether the constraint could be sensitively accommodated within the development layout? Furthermore, the first criteria seeks to ensure development locations either have good existing access to services and facilities, or that such access 'can be provided as part of the new development' – how will the latter criteria be assessed? Care needs to be taken to ensure that the assessment of development locations is not too broad brush and is based, where possible, on site</p>	20 Apr 2021

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	<p>specific information (i.e. that the policies in the Plan are robustly evidenced and therefore sound).</p> <p>The above approach will need particular care when considering the proposed Green Infrastructure and Nature Networks discussed as part of Guiding Principle 4. Whilst this approach is supported by various aspects of national policy and guidance, and is also building on the principles and priorities within the West of England Joint Green Infrastructure Strategy 2020 - 2030, the diagram included on page 71 of the consultation document is, by its nature, broad and high level, and so should not be seen to imply any level of detail or prescription beyond its indicative status. It should be recognised by the Plan that carefully planned and designed new development is very well placed to make a significant contribution to the delivery of enhanced Green Infrastructure, whether that is new public open space and recreational facilities, or areas designed for enhanced Biodiversity value.</p> <p>In addition, availability/developer involvement is not cited as a guiding principle and this should be a consideration, as it is fundamental to inform the deliverability of any site options, and this will be important when considering the viability of the Plan, and components of it. It is important to ensure that sites included in the future Plan are capable of delivering much needed new homes in a timely manner. Sites that are available and have evidence of deliverability should be considered favourably, and conversely sites without clear availability or deliverability should be treated with caution.</p>	
Taylor Wimpey UK Ltd - Land at Vilner Farm	<p>Six guiding principles are set out that the document explains will be used to help assess the suitability of potential development locations. The principles are generally acceptable and based on reasonable priorities such as protecting designated sites and taking a sequential approach to land at risk of flooding. However, we would question how the Council will be making the assessments of each principle when deciding whether or not a site should be allocated for development. There is a danger that blanket application of binary criteria could exclude sites that may, when viewed holistically, be the most sustainable locations for development. For example, if part of a large site is within Flood Zone 3 or in the setting of a heritage asset would this mean the whole site is excluded, regardless of any consideration as to whether the constraint could be sensitively accommodated within the development layout? Furthermore, the first criteria seeks to ensure development locations either have good existing access to services and facilities, or that such access 'can be provided as part of the new development' – how will the latter criteria be assessed? Care needs to be taken to ensure that the assessment of development locations is not too broad brush and is based, where possible, on site specific information (i.e. that the policies in the Plan are robustly evidenced and therefore sound).</p> <p>The above approach will need particular care when considering the proposed Green Infrastructure and Nature Networks discussed as part of Guiding Principle 4. Whilst this approach is supported by various aspects of national policy and guidance, and is also building on the principles and priorities within the West of England Joint Green Infrastructure Strategy 2020 - 2030, the diagram included on page 71 of the consultation document is, by its nature, broad and high level, and so should not be seen to imply any level of detail or prescription beyond its indicative status. It</p>	20 Apr 2021

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	<p>should be recognised by the Plan that carefully planned and designed new development is very well placed to make a significant contribution to the delivery of enhanced Green Infrastructure, whether that is new public open space and recreational facilities, or areas designed for enhanced Biodiversity value.</p> <p>In addition, availability/developer involvement is not cited as a guiding principle and this should be a consideration, as it is fundamental to inform the deliverability of any site options, and this will be important when considering the viability of the Plan, and components of it. It is important to ensure that sites included in the future Plan are capable of delivering much needed new homes in a timely manner. Sites that are available and have evidence of deliverability should be considered favourably, and conversely sites without clear availability or deliverability should be treated with caution.</p>	
Terry Chamberlain and Alan Jobbins	<p>4.19 Our comments on the six guiding principles are listed below:</p> <ol style="list-style-type: none"> 1. Locate new homes, jobs or settlements in places where key services and facilities are easily accessed by walking and cycling or effective Public Transport, or alternatively in locations where key services and facilities are capable of being provided as part of the new development. <p>4.20 Agree. There are numerous benefits associated with locating development in places with either good existing access to services and facilities or the potential to make them accessible.</p> <p>4.21 This goes beyond the general imperative to reduce reliance on the private motor vehicle to combat Carbon emissions and Climate Change which is the obvious key benefit. Greater accessibility to said services and facilities helps combat other social and economic issues such as loneliness and unemployment, especially where the use of a private motor vehicle is not an option (e.g. for younger, older and disabled residents).</p> <p>4.22 Increased use of active modes of transport also supports healthier lifestyles and the closer people live to key services and facilities, the more attractive these options become. This is also true of Public Transport where more frequent and shorter journey times go hand in hand with increased usage. Again, this is likely to be achieved where development is located in close proximity to services, facilities and existing transport routes.</p> <p>4.23 The other advantage is that, where the private motor vehicle is used, journeys will typically be shorter and, therefore, emissions will be lower as a result.</p> <p>4.24 The application of this principle will generally (although not necessarily always) lead to the identification of the more sustainable locations of development and, as such, we support this as a guiding principle.</p> <ol style="list-style-type: none"> 2. Sequential approach to building on areas at a high risk of flooding. <p>4.25 Agree. Paragraph 157 of the NPPF states that, "all Plans should apply a sequential, risk-based approach to the location of development – taking into</p>	05 May 2021

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	<p>account the current and future impacts of Climate Change so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:</p> <p>a) Applying the sequential test and then, if necessary, the exception test as set out below;</p> <p>b) Safeguarding land from development that is required, or likely to be required, for current or future flood management;</p> <p>c) Using opportunities provided by new development to reduce the causes and impacts of flooding (where appropriate through the use of natural flood management techniques); and</p> <p>d) Where Climate Change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations."</p> <p>4.26 Paragraph 158 of the NPPF follows this up by stating that "Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding... The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding."</p> <p>4.27 National Policy is clear in the importance of steering new development away from areas at risk of flooding. Indeed, paragraph 158 is clear in its directive that development should not be allocated or permitted where there are reasonably available sites in areas with a lower risk of flooding.</p> <p>4.28 This is not to say that development within areas at risk of flooding is always unacceptable and indeed there may be good reasons for doing so, say, where there are clear sustainability benefits or a lack of land in areas at lower risks of flooding. However, as a general principle, sites in Flood Zone 1 should take precedence over sites in Flood Zones 2 and 3 when it comes to identifying sites for development.</p> <p>4.29 When applying the sequential approach through the Local Plan process, we would stress that a site's Green Belt designation should not be something which dictates whether it is reasonably available or not. This is because the Local Plan process allows for revisions to Green Belt boundaries where there are exceptional circumstances for doing so.</p> <p>4.30 This is different to the very special circumstances that need to be demonstrated under the development management process in order to allow development in the Green Belt and that would otherwise allow a site to be discounted within any sequential assessment.</p> <p>4.31 Indeed, the need to avoid areas of flood risk can be a contributing factor to demonstrating the exceptional circumstances for releasing land from the Green Belt as there are sound environmental and social reasons for doing so. The judgment in</p>	

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	<p>the 2015 court case Calverton Parish Council v Greater Nottingham Council & Others (EWHC 1078) identifies five matters to consider when assessing whether exceptional circumstances are present. One such identified circumstance was the "consequent difficulties in securing sustainable development without impinging on the Green Belt."</p> <p>4.32 The development of greenfield sites in areas of flood risk is inherently unsustainable given that it exacerbates the potential impacts of Climate Change and increases the risks to human life and property. Assuming that the development needs of the District could not be met on sustainable locations outside the Green Belt on land entirely within Flood Zone 1, then this would constitute an exceptional circumstance that would justify development in the Green Belt.</p> <p>4.33 In short, National Policy is clear in that development should be steered away from areas of high flood risk. Key reasons for this are to mitigate the potential impacts of Climate Change and minimise the risk to human life and property. The need to avoid areas of flood risk would be a contributing factor to justifying the release of Green Belt sites in sustainable locations.</p> <p>3. Protect and enhance ecological, landscape and heritage designations and their settings.</p> <p>4.34 Agree. The level of protection afforded should be proportionate to their relative significance, as dictated by the NPPF and relevant legislation. For all potential strategic allocations, the public benefits may need to be weighed against any harms through the Sustainability Appraisal process.</p> <p>4. Protect and enhance the function and connectivity of our Green Infrastructure and Nature Recovery Networks.</p> <p>4.35 Agree. As above, the level of protection afforded should be proportionate and appropriate to the significance of said asset. Proposals should also be considered on a wholistic basis, with the net gains that could be facilitated through the loss of certain features that may be necessary to enable development to come forward.</p> <p>5. Plan for a better balance between local jobs and resident workers in our communities.</p> <p>4.36 Agree. The need to commute to and from work is unavoidable for many and this is often done by the private motor vehicle. Locating development in close proximity to areas with good access to existing employment centres and/or delivering employment alongside new residential development can help to promote the use of walking, cycling and Public Transport as an alternative to the private motor vehicle.</p> <p>4.37 There are also social benefits in achieving a good balance between local jobs and resident workers. Offering alternative (and cheaper) options to the private motor vehicle will improve accessibility to employment for many people, some of whom may not own a car. This can, in turn, combat unemployment and the</p>	

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	<p>financial hardship/poverty associated with it. It can also improve accessibility to education and extracurricular activities for both younger and older residents who may not be able or desire to use the private motor vehicle to access said opportunities.</p> <p>4.38 Given the importance of the North Bristol Fringe as an employment centre for the District, the Local Plan needs to consider how development which is well-related to it can come forward. Again, development at Hambrook should be explored on this basis.</p> <p>6. Ensuring that we protect a ‘sense of place and character’ when we plan for new development.</p> <p>4.39 We support this principle in the sense that the protection of place and character should be sought where the current sense of place and character is worth preserving. Opportunities to enhance, improve and create a new sense of place and character should also be explored where the context dictates.</p> <p>Do you think we have missed any key, initial guiding principles?</p> <p>4.40 Whilst we agree with the guiding principles as a sound way in which to identify sustainable locations for growth, the absence of 'deliverability' as a principle is of some concern. As has been alluded to in the Phase 1 document, deliverability issues have led to the Council being unable to demonstrate a robust housing land supply in recent years. This has led to speculative development at many of the non-Green Belt towns and villages coming forward in recent years. Again, whilst this development is not fundamentally unsustainable in nature, it sits outside of an agreed framework which would most likely deliver more sustainable development in the round.</p> <p>4.41 Deliverability, or rather a failure to deliver the housing to meet the District's needs, also has significant social and economic consequences which we have touched on above and are considered in the latest SA.</p> <p>4.42 We accept that deliverability considerations may not be appropriate for the purposes of identifying potential locations for development. However, it should certainly form part of any site sifting exercise that may be undertaken, once these options have been identified.</p> <p>4.43 We would suggest a deliverability metric be applied to all options considered and those considered to be at significant risk of delivery, should be screened out at an appropriate stage.</p>	
The Badminton Estate	<p>Please see accompanying representation.</p> <p>4.3. The six guiding principles following on from this are proposed as a guide on how sites will be considered suitable for development as well helping to meet the ‘Potential Priorities’ as above.</p> <p>4.4. Of those, guiding principle 1 seeks to “locate new homes, jobs or settlements in</p>	04 May 2021

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	<p>places where key services and facilities are easily accessed by walking and cycling or effective Public Transport, or alternatively in locations where key services and facilities are capable of being provided as part of the new development.” It is understood that this principle is a common strategy used across all Local Authorities in determining where growth should be concentrated. We agree that this approach is appropriate and necessary to achieve sustainable development. However, in a diverse District such as South Gloucestershire, that principle should not disregard locations where housing could be located “where it will enhance or maintain the vitality of rural communities.” As stipulated at Paragraph 78 of the NPPF “Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.” In that regard, sites that are situated within or adjacent to smaller villages, and which may have access to fewer services and facilities or less frequent Public Transport services, should still be considered suitable locations for development which is proportionate to the settlement size and its function, allowing for incremental growth which will help sustain and enhance rural villages. The NPPF makes clear at Paragraph 103 that opportunities to maximise sustainable transport solutions will vary between urban and rural areas and this should be taken into account during Plan-making and also when looking to support the sustainability of existing communities.</p> <p>4.5. Such principles can be effective within rural communities, allowing persons to work from home comfortably or have a ‘community employment hub’ that locals can use to work effectively and sustainably. Consequently, a reduction in the need to travel can be achieved which overall reduces Carbon emissions, having a positive impact upon Climate Change. It should also be noted that having the ability to work from home has become increasingly more important during the COVID pandemic and our planning policies will need to respond rapidly to accommodate this change within all our communities.</p> <p>4.6. Finally, guiding principle 6 aims to ensure that development protects a “sense of place and character.” Within this, we support the Council’s recognition that development should respond to the “existing natural, built, historic and landscape assets, while enhancing the future character and distinctiveness of each unique area” and that the context of an existing community and the ability for an existing area to accommodate further growth are key factors in achieving sustainable development. The importance of this has recently been highlighted through the proposed changes to the NPPF. Irrespective of this, the Estate firmly believes that new development in smaller communities should reflect the existing architecture and building pattern and ensure that they are of a high quality and sustainable design that assimilates well with the host community.</p> <p>4.7. To that end, it is respectfully requested the Council deliver guiding principles 1 and 5 and do not use guiding principle 6 to unnecessarily restrict growth in rural areas to ensure sustainable housing and employment growth is achieved within the District which is proportionate and helps sustain and enhance the viability and viability of those settlements. Doing so will help the District achieve a greener economy and help respond to the implications of COVID-19, as well as providing</p>	

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	balanced and healthy communities as advocated at Paragraph 91 of the NPPF.	
Theodore Butt Philip - South Gloucestershire Liberal Democrat Council Group	<p>We believe in the need for a balanced approach to development.</p> <p>Development should not be overly-concentrated in just one or two areas, but should allow communities to develop organically at a rate sympathetic to the nature of those communities.</p> <p>We reject the idea of excessively focusing ever more development in a small number of places, which risk growing beyond what is reasonable. Equally, we are concerned about the prospect of abandoning some rural communities so that they will never grow to provide the new homes for (in particular) young families which will help keep those communities sustainable.</p> <p>Areas which currently do not have sufficient low/no carbon transport links or community facilities, should be supported to develop them, rather than assuming that an area which doesn't have infrastructure will never have it.</p>	12 Mar 2021
The Tortworth Estate	The proposed approach of using the presence of overarching constraints (including flood risk, Green Belt, heritage, ecology) and proximity to key connections/ services, or where existing connections can be easily enhanced to guide development, appears to be logical and generally in accordance with national guidance. As noted within our answer to Q1, the Green Belt should only be developed if the Council's (or any required growth from Bristol) development needs cannot be met once all other reasonable options have been explored, as per the NPPF. Even where proximity to connections and services may perform well, consideration must also be given to the ability of existing infrastructure to accommodate development, noting for example the inherent infrastructure capacity and constraints within the Bristol North Fringe.	05 Mar 2021
Tiro Bestonso	<p>Yes impact on Listed buildings and Heritage</p> <p>Protected and Endangered Species Protection - Great Crested Newts - Many along Kington Lane - Long Eared Bats - along Kington Lane</p>	27 Feb 2021
Tom Cotton - Road Haulage Association	No comment.	01 Mar 2021
Tony Kerr	<p>Council should be able to take the value uplift arising from allocation of land for development, not the lucky land owner.</p> <p>Policy to ignore speculative developer proposals which are not compliant with policy aspirations for quality and sustainability.</p>	17 Feb 2021
Top To Bottom Ltd and Hanham Community Trust	See attached representations.	11 May 2021
Trevor James	See above comment.	26 Feb 2021
Tristan Clark -	There needs to be much stronger sequential/ordering principles about the use of	01 Mar

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South Gloucestershire Council	greenfield and brownfield sites for large scale development both inside and outside of the Green Belt. Furthermore, any adjustments to defined settlement boundaries and the Green Belt boundaries ought to as conservative as possible which is to say they should be undertaken as the last, rather than as the first, resort.	2021
Trystan Mabbitt - Hanson UK - Heidelberg Cement Group	<p>Guiding Principle 1. Locate homes sustainably:</p> <p>Broadly supported in that this principle promotes the allocation of land in sustainable locations for development based on proximity [should be sustainable accessibility] to key services and facilities, train stations, key Public Transport corridors, strategic cycle network and key walking routes.</p> <p>Guiding Principle 2. Sequential approach to building on areas at a high risk of flooding:</p> <p>Supported.</p> <p>Guiding Principle 3. Protect and enhance ecological, landscape and heritage designations and their settings:</p> <p>Supported in that there may be sites comparatively less sustainably located than others, but which offer considerable opportunity to enhance these existing designations and their settings, rendering them favourable.</p>	18 Mar 2021
Victoria Bailey - Oldbury on Severn Parish Council	This approach seems logical and will become clearer in Phase 2.	24 Mar 2021
Vistry Group	<p>Please refer to enclosed representations.</p> <p>Section 5: Where will new development go?</p> <p>Do you agree with the five building blocks (Urban Areas, Urban Extensions, Market Towns, Rural Villages, New Settlements)?</p> <p>The starting point for determining the location of strategic growth in the District should be the SDS. If the SDS is to be successful in delivering an overarching strategy and framework for the sub-region, which is necessary in the interests of achieving significant growth in a sustainable way, decisions regarding the location of development should be made on a collaborative sub-regional basis. It should not be the case that the SDS simply identifies a housing and job requirement for each constituent Authority (as implied by the Consultation Document) with locational factors deferred to lower tier Plans. Further comments in this regard are detailed below in response to the ‘initial guiding principles.’</p> <p>Do you have any comments on the five building blocks (Urban Areas, Urban Extensions, Market Towns, Rural Villages, New Settlements)?</p> <p>The building blocks should not be considered in isolation – to achieve a sustainable growth strategy the West of England Authorities should be exploring all reasonable</p>	06 May 2021

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	<p>options equally and with an open mind. The likelihood is that a combination of the building blocks will be necessary to achieve a constant supply of homes and jobs across the Plan period to achieve the strategic objectives. It is important that any future locational growth strategy facilitates a wide range of opportunities to help balance the need to deliver homes in the short, medium, and long term.</p> <p>The provisions set out under Chapter 11 of the NPPF do not ‘require’ Brownfield land to be considered ahead of other spatial options. It is appropriate, under the terms of the NPPF, to explore a strategy that makes ‘an effective use of land’ in accordance with paragraph 117 but this is not equivalent to a Brownfield first approach. Indeed, such a strategy has potential to undermine other sustainability objectives, including those relating to the availability of employment land and other uses that are fundamental to achieve a balanced urban community. There are also viability considerations and infrastructure capacity matters that require assessment before undue reliance is placed on urban living as a significant component of any housing supply strategy. An over-reliance on this source of supply could also have negative impacts on, for example, the delivery of affordable housing and health and wellbeing priorities (such as access to appropriate outdoor amenity space). The COVID-19 pandemic has already heightened the importance of access to private and public amenity space in the interests of physical and mental health.</p> <p>With regard to building block 3, in the context of South Gloucestershire the Market Towns should perform an important role in the delivery of both strategic and non-strategic growth during the next Plan period. In the case of Thornbury, the town is well established with a good range of existing services and facilities within the town centre and across the wider urban area. It also has an established transport network (walking, cycling, Public Transport) that is capable of being significantly improved and enhanced through investment.</p> <p>The Consultation Document raises questions about the impacts of recent ‘speculative’ developments on the market towns, using the term pejoratively to suggest that such developments are harmful and exploitative. It is essential to acknowledge that such developments have arisen only as a consequence of the failed strategy that the Council sought to deploy through previous iterations of the Local Plan. Taking Thornbury as an example, the growth around the town has occurred simply because the Council’s planning strategy articulated through the development plan has chronically failed to achieve a five-year housing land supply. The over-reliance on a handful of large sites that were not deliverable in the timeframes suggested by the Plan created the need for alternative development proposals to come forward to address the shortfalls created by the deficiencies within the Plan. These locations have demonstrated an ability to deliver homes without delay, responding positively to market demand in situations where other ‘planned’ locations in the District have failed to achieve the outcomes forecast by the Council.</p> <p>The formulation of a new Local Plan is the opportunity to devise a strategy that can use previous experience to deliver a balanced, effective, and sustainable growth platform from which the wider objectives can be achieved. To ensure that the Plan is able to guarantee continuous housing supply, sensitively planned development in</p>	

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	<p>the Market Towns should be a key component of a Spatial Strategy that can be delivered efficiently and effectively in Plan-making terms.</p> <p>The Market towns will continue to adapt as increases in the local population enhance the sense of community and local economy. There is an opportunity as part of the emerging Plan to invest in locations such as Thornbury through the implementation of a co-ordinated growth strategy that in turn brings further investment in infrastructure (including Schools, Public Transport, and health care). The quantum of development directed to Thornbury should be commensurate with the level of investment required to viably and successfully deliver new and improved infrastructure that will significantly benefit both existing and future residents.</p> <p>With reference to Building Blocks 2 and 5, experience suggests that delays can occur in delivering large scale ambitious schemes, including standalone new settlements and significant urban extensions. This is recognised in Issue 32 where the Council acknowledges the housing trajectory in both the adopted Core Strategy and predecessor Local Plan have been consistently overoptimistic about the rate of housing delivery, leading to shortfalls in five-year housing land supply. Existing allocations in the Northern and Eastern Fringes have long lead in periods and have been slow in delivering the homes expected by the Core Strategy. As noted in issue 33 the delivery and build out, particularly of large-scale sites with significant amounts of infrastructure, and/or multiple land ownerships, has taken longer than planned, meaning that the Spatial Strategy of the Plan has failed to achieve the intended outcomes.</p> <p>Housing delivery in the District has fallen consistently short of the Core Strategy housing target and continues to do so. In headline terms this has become less of an issue for the Council because the Plan is now more than five years old as a consequence of which the Council’s five-year housing land supply requirement is generated using the local housing need figure derived from the standard methodology (SM). The application of the SM allows the Authority to set-aside all past shortfalls that have accumulated annually against the Core Strategy requirement, meaning that past under-performance is not considered directly, as would be the case with an up-to-date Local Plan housing requirement. On the face of it the Council is able to claim that housing land supply is adequate, while continuing to under-perform against its own Core Strategy housing requirement. The Plan-making process must address this anomaly.</p> <p>Large scale new settlements and urban extensions by their very nature require upfront infrastructure before dwellings can be delivered on site, which has a direct impact on housing delivery in the short and medium terms. While new settlements and urban extensions could form a component of the Spatial Strategy in the latter part of the Plan period and beyond (consistent with the draft revised NPPF paragraph 22), it is equally important that any strategy does not rely entirely on new homes from these sources. To achieve the strategic objectives for the area it is essential that a broad range of sites is available to deliver consistently across the Plan-period. Opportunities to deliver short term housing that can also facilitate notable improvements in infrastructure for communities in market towns, and in</p>	

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	<p>turn rural hinterlands, should also be explored fully. At this stage in the Plan-making process it is critical that the Councils do not disregard the opportunities presented via the expansion of existing market towns such as Thornbury that contain a good range of existing facilities and services and are capable of accommodating further growth alongside enhancements to existing infrastructure.</p> <p>Do you agree with the initial guiding principles? Do you think we have missed any key, initial guiding principles?</p> <p>As set out above, the principles guiding the distribution and location of development should be determined by WECA on a sub-regional basis. It is not appropriate for each Authority to establish a Spatial Strategy specific to each District independently of the SDS process. Wider sub-regional sustainability objectives, including housing need, economic recovery, infrastructure delivery, and the environment, are all matters that will directly inform the locational strategy – as set out within the Statement of Common Ground for Strategic Planning (September 2020) these are cross boundary issues that require joined up thinking and collaboration if the SDS is to succeed in delivering a spatial development strategy for the sub-region. Such an approach would then enable the constituent Authorities to deliver a joined up and holistic approach via the preparation of the Local Plans.</p> <p>The guiding principles listed in the Consultation Document may form a component of the sub-regional strategy, but it is inappropriate to pre-determine these at the local level in advance of a draft SDS and associated evidence base (including the Sustainability Appraisal) being prepared.</p>	
Vistry Group - Land at Post 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. 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 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 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>	29 Apr 2021

Respondent Name	User Response: Text	Response Created
	<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 consideration of urban extensions, growth at market towns, rural villages and settlements and also possibly 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 now as part of preparing a new Plan, although it is very clear that there are sustainable non-Green Belt options available, including land directly to the North of Thornbury beyond the existing Vistry development at Post Farm, which should be fully explored and utilised first.</p> <p>Guiding Principles:</p> <p>Six guiding principles are set out that the document explains will be used to help assess the suitability of potential development locations. The principles are generally acceptable and based on reasonable priorities such as protecting designated sites and taking a sequential approach to land at risk of flooding. However, we would question how the Council will be making the assessments of each principle when deciding whether or not a site should be allocated for development. There is a danger that blanket application of binary criteria could exclude sites that may, when viewed holistically, be the most sustainable locations for development. For example, if part of a large site is within Flood Zone 3 or in the setting of a heritage asset, would this mean the whole site is excluded, regardless of any consideration as to whether the constraint could be sensitively accommodated within the development layout? Furthermore, the first criterion seeks to ensure development locations either have good existing access to services and facilities, or that such access ‘can be provided as part of the new development’ – how will the latter criteria be assessed? Care needs to be taken to ensure that the assessment of development locations is not too broad brush and is based, where possible, on site specific information (i.e. that the policies in the Plan are robustly evidenced and therefore sound).</p> <p>In addition, availability/developer involvement is not cited as a guiding principle and this should be a consideration, as it is fundamental to inform the deliverability of any site options, and this will be important when considering the viability of the Plan, and components of it. It is important to ensure that sites included in the Plan are capable of delivering much needed new homes in a timely manner. Sites that are available and have evidence of deliverability should be considered favourably, and conversely sites without clear availability or deliverability should be treated with caution.</p>	
Vistry Group - Land at Yew Tree Farm	<p>SECTION 5 – STRATEGY - WHERE WILL NEW DEVELOPMENT GO?</p> <p>Building blocks:</p>	29 Apr 2021

Respondent Name	User Response: Text	Response Created
	<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 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 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 consideration of urban extensions, growth at market towns, rural villages and settlements and also possibly 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 now as part of preparing a new Plan, although it is very clear that there are sustainable non-Green Belt options available, including land directly to the North of Thornbury beyond the existing Vistry development at Post Farm, which should be fully explored and utilised first.</p> <p>Guiding Principles:</p> <p>Six guiding principles are set out that the document explains will be used to help assess the suitability of potential development locations. The principles are generally acceptable and based on reasonable priorities such as protecting designated sites and taking a sequential approach to land at risk of flooding. However, we would question how the Council will be making the assessments of each principle when deciding whether or not a site should be allocated for development. There is a danger that blanket application of binary criteria could exclude sites that may, when viewed holistically, be the most sustainable locations for development. For example, if part of a large site is within Flood Zone 3 or in the</p>	

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Waddeton Park Ltd - Land at Hicks Common Road	<p>42. There is varied reference to building and sustaining communities, but we believe this should be a Guiding Principle in its own right. It may include matters such as describing what a walkable neighbourhood is and what land uses it may consist of? It should focus on social and health matters which any good development will address.</p> <p>43. Alternative modes of travel such as, E-bicycle and e-scooter should form part of Guiding Principle 1 given that they bridge the gap between the walkable neighbourhood and necessary wider travel. Our Client is keen to see a Plan which supports Bristol as the 'Cycling City' and offering the extension of this mode of travel into South Gloucestershire by enabling slightly longer distance journeys to become more convenient. When journey to work data is examined, settlements immediately around the Greater Bristol area are most likely to benefit from this. Likewise, it provides much more flexibility than bus which rely on set times and routes that do not always correspond with where and when people need to travel for work. The benefits of this approach are set out in the technical note in Appendix 2.</p>	17 May 2021
William Howell	No	23 Feb 2021
William Sharpe-Neal	Do not agree to develop new housing at the land to the west of Thornbury Castle 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.	28 Feb 2021

Report run at 4 Feb 2022 10:11:07. Total records: 189