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## Report on Questionnaire Answers

Questionnaire: Local Plan 2020

Question: [11: Urban Lifestyles] Do you have any comments on the Urban Lifes...

Respondent Name	User Response: Text	Response Created
A. Ashyon	More green spaces	31 Jan 2021
Adam Gould	n/a	27 Feb 2021
Alan Jones - Hanham & District Greenbelt Conservation Society	<p>The 'Planning for the Future' white paper August 2020, included illustrations of award winning housing developments in urban settings. The majority of these great examples of ambitious redevelopment and new-build projects were architect-led, facilitated by organisations, such as Homes England.</p> <p>The resulting projects achieved cohesive urban neighbourhoods with high densities. At the time these inspiring examples were (dubiously) used to advocate how a revised planning system would deliver high quality homes. In addition, the RIBA Sterling award 2019 was won by a 100 unit council estate in Norfolk, comprising 'passivhaus' sustainable homes.</p> <p>Urban locations are suited to higher density housing, with the average sustainable urban density being 69units/Ha.</p> <p>A common theme between these examples of innovative housing is that the community were involved in the initial planning of the developments, and they collectively demonstrate that great community housing can be achieved with focus, expertise and effort. Reliance on national volume house builders providing the answer to urban rejuvenation will result in 'more of the same' standard-pattern units being provided.</p> <p>An example of innovative housing closer to home, is the Bristol City housing scheme in the car park of St Georges Park - the pre-fabricated units, erected on a deck above parking, provides an example of just what can be done, at the expense of only four car parking spaces - imagine the vast car parking at Emerson's Green, Downend and Yate also providing accommodation, without the need for expanding into our countryside!</p> <p>The availability of public transport in these environments enable a more stringent approach to car ownership, and consequential reductions in provision of parking requirements.</p> <p>However, with the need to facilitate street-side electricity recharging facilities, a major infrastructure initiative will be necessary to provide accessibility within urban areas to provide homes without driveways the advantages of electric vehicle transport.</p>	26 Feb 2021
Alex Child - The Retirement Housing Consortium	<p>As above preference must be given to the optimum development of existing urban areas</p> <p>There should also be a dedicated policy in respect of housing for older people</p>	01 Mar 2021
Andrew Rigler	I fully endorse and support the response from TRAPPD. I would add that housing	31 Jan

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	within town centres is essential, Thornbury High Street being a prime example of the wasteland a town centre becomes without a population.	2021
Andrew Shore	<p>Urbane lifestyles is too compartmentalised an approach. There is time, space and a need for people to want of mix of what you describe as urban lifestyles, but also won't would probably be designated the opposite. Don't try to put all people or communities into these boxes or categories.</p> <p>Need to be especially careful when urbanised near to less urban areas.</p> <p>In reality/practical terms much emphasis is put on urban lifestyles and public transport links as being the be-all and end-all, when actually we know that doesn't work as simply as it is believed to. Our policies need to better reflect the real world.</p> <p>On your issue 2 in this section, don't fall into her trap of thinking all open spaces have to be connected or used. Some can and should simply be left as they are.</p> <p>Insufficient provision of bungalows in the housing stock, so people can live on ground floor when their needs make is necessary or desirable, eg. So more people can live in the community rather than having to go into sheltered accommodation.</p> <p>Too much urbanisation leads to the loss of spaces &amp; greenery, and makes the areas feel too closed-in.</p> <p>Make more use of brownfield development on old industrial, retail sites.</p> <p>Urban lifestyles should be reserved for brand new developments that area away from existing settlements, not be allowed to turn existing areas into over key urbanised areas.</p> <p>Eg. Parkway Station to UWE area is being too urbanised.</p>	01 Mar 2021
Angela Chapman	<p>The answer is in the word "Urban".</p> <p>These areas wherever should remain as villages with surrounding green areas of natural beauty. Everybody's well-being is affected by removing these areas and anywhere near a river should remain rural not build and cause inland flooding!</p>	23 Feb 2021
Angela Crabtree	<p>Please see the Trapp'd Response.</p> <p>(Thornbury Residents Against Poorly Planned Development)</p>	28 Feb 2021
Angie Carroll - Parish Council	Yes. Keep urban and rural separate don't swamp small villages with hundreds of houses	16 Feb 2021
Anne Thomson - Burbank Neighbourhood Watch	No	21 Jan 2021
Ashfield Land	<p>Please see enclosed representations.</p> <p>7.13 As set out, we wholly agree with prioritising Brownfield land opportunities</p>	31 Mar 2021

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	<p>within existing urban areas. Our key concern with the Urban Lifestyles approach at this stage would be that SGC are relying on this option to deliver a significant proportion of growth, without (in our view) actually putting forward an approach for how this land will be identified, and the overall numbers of homes that could be delivered robustly identified. A detailed assessment of this issue is needed urgently so the Council has a clear idea of the scale of growth that needs to be accommodated via other development options.</p> <p>7.14 We acknowledge that there will always be Brownfield opportunities which come to fruition throughout the Plan period which were not identified in the Local Plan, and this can be hard to plan for now. Yet the wording within the document is extremely vague and we are concerned that this will remain the case as the Plan progresses which will not give a direction on how much greenfield land, for example, is needed to ensure the development needs of the area are met.</p> <p>7.15 We therefore require clarification that the identification of sites that will form part of the Urban Lifestyles approach will come from a clear evidence base which sets out available land opportunities (evidenced in the Call for Sites) and a realistic/thorough masterplanning process which can set out a clear number of homes that can be delivered via this source of supply.</p>	
ATA Estates (Longwell Green) LLP and Sovereign Housing Associaton	The Council has acknowledged that the likelihood of meeting all of its needs for new homes and jobs in the urban areas are low. Greenfield extensions to urban areas can offer a sustainable solution for meeting the needs of the District, in particular on the Eastern Fringe of Bristol, and should be investigated further.	06 Apr 2021
Barratt Homes (Bristol) Ltd	Please see enclosed submission.	14 Apr 2021
Barrie Hesketh	No	16 Feb 2021
Barwood Development Securities & The North West Thornbury Landowner Consortium	<p>Urban Lifestyles:</p> <p>The opportunities for redevelopment and regeneration within the existing urban areas is recognised, and as per paragraph 117 (NPPF), the new Local Plan will need to set out a clear strategy to make efficient use of Brownfield land. We support the holistic approach set out in the consultation document – that redevelopment is for a mix of uses, which whilst including some residential development, must also include employment, green spaces, community uses and leisure/retail.</p> <p>Optimising Density:</p> <p>There are competing interests in respect to optimising density and the lessons learnt from Covid in terms of placemaking. It has become evident that the provision of space (including secondary rooms for working from home), green infrastructure and private amenity spaces are central to the delivery of sustainable and resilient new urban places. The pandemic has both highlighted the failures of some of the UK’s main urban centres in achieving this placemaking balance, and is also</p>	12 Apr 2021

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	<p>considered to be fundamentally changing the housing market. Whether the market for urban apartments will be as strong coming out of the pandemic and into the future remains to uncertain, however recent evidence of housing transactions during the pandemic has seen a decline in the sale of flats between April - November 2020 and a commensurate increase in the sale of detached properties. If this pattern remained then it could have a significant impact on the desirability of apartments and consequently the density of housing development.</p> <p>Apartments – Addressing Need:</p> <p>The consultation document indicates that the delivery of apartments will be key to this strategy. Before the Local Plan process progresses to the next stage we recommend that the Council commission research on the need, and market demand for, apartments within the urban fringes of Bristol, and South Gloucestershire’s wider urban areas.</p> <p>In this regard, we note that the evidence base supporting the JSP indicated that the need across the Wider Bristol HMA (Bristol, North Somerset and South Gloucestershire) was split 30% flats and 70% houses. However, historically, the area delivered 58% flats (with 80% of housing completions in Bristol between 2010 - 2018 being flats). At that point in time, existing commitments, windfall and the assumptions underpinning the urban living scenario indicated that the Wider Bristol area would overprovide flats by some 30%.</p> <p>An over-provision of apartments which does not match market demand could have a number of negative consequences. First, it is likely to result in a low rate of housing delivery as the market adjusts to the lack of demand. Secondly, it may result in a decrease in the value of flats – rendering the aspired scale of regeneration less likely to be deliverable. Thirdly, the demand for houses would likely inflate the price of homes on the second hand (aka non-new build) market, resulting in a greater price disparity between the alternative types of accommodation. Finally, there is also potential that house purchasers will look further afield to meet their housing needs, resulting in a greater propensity for long-distance commuting. It is crucial that the proposed split between homes and apartments delivered through densification is based upon robust evidence that the output will match demand (across the entire SDS area).</p> <p>Availability and Deliverability:</p> <p>We recognise that the Urban Lifestyles policy is aspirational, and we support the intention to set out a positive framework for redevelopment proposals to come forward. However, we note that it is predicated on a significant number of sites and development parcels which have never been promoted for development, are already in existing use, and will require complicated land agreements between different parties, tenants etc. Further, there are likely to be significant viability constraints to the redevelopment potential of locations. It will therefore be necessary to adopt very cautious delivery assumptions from this source of housing supply.</p>	
Bloor Homes	Urban Lifestyles:	01 Apr 2021

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	4.1 We recognise that maximising development opportunities within the existing urban areas is a key element of national planning policy and that there has been a great deal of emphasis recently on densification as a source of housing supply. We do not object in principle but would urge caution in this approach and in moving forward, emphasise that the Spatial Strategy must be based upon a robust assessment of 1) deliverability and 2) need.	
Bloor Homes and Maximus Strategic Warmley Ltd	Please see enclosed submission.	29 Mar 2021
Bloor Homes South West Ltd - Land at North West Yate	<p>SECTION 6 – URBAN LIFESTYLES:</p> <p>The ‘Urban Lifestyles’ section of the Plan explains that it sets out a proposed new approach to development in some urban areas. It is not clear how this standalone section relates to the previous Spatial Strategy section (specifically the identification of the first ‘building block’ - focusing development in existing urban areas). Clarification is sought as to whether there is a distinction between the areas identified in the Urban Lifestyles section and those referred to under the first ‘building block.’ If the Urban Lifestyles section is providing further detail for how the first building block will be realised this needs to be made more explicitly clear in the document, as the approach (and evidence of the suitability and capacity for ‘urban lifestyles’ development, will likely have a significant impact on the final Spatial Strategy).</p> <p>The principle of part of the development strategy being to deliver growth in existing urban areas/settlements is supported generally accepted, and accords with relevant policy, guidance and good practice. However, as set out in relation to the first building block, there is likely to be insufficient capacity within urban areas to accommodate the level of growth needed in the District, and other development locations will need to be identified. The level of growth planned for as part of Urban Lifestyles must be derived from a very robust evidence base, at present there does not appear to have been anything presented to explain what the potential capacity is in existing urban areas. In addition to the concerns raised above in relation to over reliance on Brownfield sites, it is important that scheme viability is properly considered if this is a key source of delivery in the Plan. Brownfield sites can take time and cost to remediate and be available for redevelopment and there are often constraints on the type and scale of development which can be achieved, and the areas of the housing market which these products will be attractive to. It is not clear from the existing evidence base supporting both the sub-regional and local policies that viability has properly been considered (it is essential that this is fully done through subsequent stages of the Plan).</p>	25 Mar 2021
Bloor Homes South West Ltd - Land at South Farm	<p>SECTION 6 – URBAN LIFESTYLES:</p> <p>The ‘Urban Lifestyles’ section of the Plan explains that it sets out a proposed new approach to development in some urban areas. It is not clear how this standalone section relates to the previous Spatial Strategy section (specifically the identification of the first ‘building block’ - focusing development in existing urban areas). Clarification is sought as to whether there is a distinction between the areas</p>	26 Mar 2021

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	<p>identified in the Urban Lifestyles section and those referred to under the first ‘building block.’ If the Urban Lifestyles section is providing further detail for how the first building block will be realised this needs to be made more explicitly clear in the document, as the approach (and evidence of the suitability and capacity for ‘urban lifestyles’ development, will likely have a significant impact on the final Spatial Strategy).</p> <p>The principle of part of the development strategy being to deliver growth in existing urban areas/settlements is generally accepted, however, there is insufficient capacity within urban areas to accommodate the level of growth needed in the District, and other development locations will need to be identified. The level of growth planned for as part of Urban Lifestyles must be derived from a very robust evidence base, at present there does not appear to have been anything presented to explain what the potential capacity is in existing urban areas. In addition to the concerns raised above in relation to over reliance on Brownfield sites, it is important that scheme viability is properly considered if this is a key source of delivery in the Plan. Brownfield sites can take time and cost to remediate and be available for redevelopment and there are often constraints on the type and scale of development which can be achieved, and the areas of the housing market which these products will be attractive to. It is not clear from the existing evidence base supporting both the sub-regional and local policies that viability has properly been considered (it is essential that this is fully done through subsequent stages of the Plan).</p>	
<p>Bloor Homes South West Ltd - Land at Wotton Road</p>	<p>The ‘Urban Lifestyles’ section of the Plan explains that it sets out a proposed new approach to development in some urban areas. It is not clear how this standalone section relates to the previous Spatial Strategy section (specifically the identification of the first ‘building block’ - focusing development in existing urban areas). Clarification is sought as to whether there is a distinction between the areas identified in the Urban Lifestyles section and those referred to under the first ‘building block.’ If the Urban Lifestyles section is providing further detail for how the first building block will be realised this needs to be made more explicitly clear in the document, as the approach (and evidence of the suitability and capacity for ‘urban lifestyles’ development, will likely have a significant impact on the final Spatial Strategy).</p> <p>The principle of part of the development strategy being to deliver growth in existing urban areas/settlements is generally accepted, however, there is insufficient capacity within urban areas to accommodate the level of growth needed in the District, and other development locations will need to be identified. The level of growth planned for as part of Urban Lifestyles must be derived from a very robust evidence base, at present there does not appear to have been anything presented to explain what the potential capacity is in existing urban areas. In addition to the concerns raised above in relation to over reliance on Brownfield sites, it is important that scheme viability is properly considered if this is a key source of delivery in the Plan. Brownfield sites can take time and cost to remediate and be available for redevelopment and there are often constraints on the type and scale of development which can be achieved, and the areas of the housing market which these products will be attractive to. It is not clear from the existing evidence base supporting both the sub-regional and local policies that viability has properly been</p>	<p>20 Apr 2021</p>

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	considered (it is essential that this is fully done through subsequent stages of the Plan).	
Brian Hackland	See 7 above. There is value in an 'urban lifestyles' approach as a mechanism for a fresh approach to the renewal of urban areas and developing a better fit with how people in urban areas choose to live, work and play.	26 Feb 2021
Caroline Phillips	Balconies are nothing new. Thought needs to be considered as to the height of these buildings and not detracting the views from existing properties.	12 Mar 2021
Cate Davidson - Sodbury Town Council	There are going to be some huge opportunities in urban areas to re-purpose and/or redevelop certain areas as we come out of this pandemic. The proposals put forward in this document to generate vibrant communities, that thrive during the day and in the evening though the mix of business and residential properties are very exciting. The challenge will be turning this into reality so that these areas benefit from a much needed redevelopment and we don't end up with urban sprawl onto new land, leaving some deprived areas behind.	03 Mar 2021
CEG and the Charfield Landowners Consortium (CEGCLC)	Please see accompanying covering letter.	23 Apr 2021
Chris Rich - Mizmo Communications Ltd	Maximizing development opportunities within existing urban areas is supported. However, the capacity that this will be able to deliver will be limited and alternative opportunities for development, especially employment provision at strategic locations, such as Junction 18A of the M4, will need to be considered as well.	11 Mar 2021
Chris Stow	I agree there is considerable scope to increase the number of homes in and around these urban areas but as long as any homes provided or extended does not reduce the amenities for the new or existing residents. I would also hope that green spaces and recreational areas in and around these urban areas would be retained and/or improved.	08 Jan 2021
Christina Biggs - Friends of Suburban Bristol Railways	<p>Only if the Urban Lifestyle area has a rail station with at least an hourly service, preferably half-hourly or every fifteen minutes. It is irresponsible in the extreme to generate road traffic which will only cause congestion and air pollution in centres like Greater Bristol.</p> <p>Patchway Station must be developed with an adequate bus service and passenger footbridge into Bradley Stoke. The Henbury Loop line must continue to both Avonmouth and the Severn Beach Line, and possibly Severn Beach (via a chord at Holesmouth) as set out in the WECA Rail Plan. Pilning Station must be developed to serve the growing needs of Severnside, to enable commuters to travel in from Wales and cycle to work from the station.</p> <p>There is no mention of the location of employment which must be co-located with housing or risk further gridlock in Northern Bristol. There must be an adequate rail service on the Henbury Line - half-hourly not hourly - connecting to Parkway Station and serving the Brabazon Arena in partnership with YTL.</p> <p>Coalpit Heath station could be located on its previous site on the level ground at</p>	27 Feb 2021

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	Ram Hill business park which is easily reached from Winterbourne and Emersons Green, or nearer to the Badminton Road bus routes.	
Chris Willmore - Yate Town Council	<p>Pages 75 to 90 – Urban lifestyles:</p> <ul style="list-style-type: none"> <li>• We object to presumption of increased housing density despite the acknowledged need for new developments to cater for working at home.</li> <li>• Optimising density” is a misleadingly optimistic terminology – the meaning here is “increasing density,” so why not be clear and say so?</li> <li>• Members note that the Urban Lifestyles video majors on flats above shops and the like, with the private outdoor space that is acknowledged to be needed being concentrated on small balconies – why is this seen to be desirable, compared to gardens and large public open spaces?</li> <li>• It is noted that in Yate one of the town’s most recent dense housing development – Normandy Drive – is seen to be crowded, with an unfriendly layout. Principles are needed to stop this becoming the norm. This is an example of urban density and is a complete failure, with parking problems, nowhere for children to play safely, and no connectivity.</li> </ul>	16 Mar 2021
Claire Normoyle	<p>See pages 76 to 112</p> <p>This section is quite rightly the most extensive of the consultation document, as the need to re-think Urban Lifestyles is the most pressing in the light of the COVID-19 legacy, climate change and concern over the impact of poor air quality on health. The key will be to deliver high density dwellings which will require a retained involvement by the public sector. Not enough emphasis has been made on this point, or in terms of what the appropriate target numbers for dwellings per hectare would be, whilst ensuring the retention of high quality of living.</p> <p>However, the ‘market towns’ of Yate and Thornbury have been included in your analysis for ‘urban lifestyle’. There is a marginal case for Yate to be included, in that it has the largest Tesco superstore (multistorey) and a sizeable multi-storey shopping centre, with an equally sizeable industrial estate, and is spread over an extensive area with a population of 30,000+, and supported by a railway station with direct access to Bristol Gloucester etc. By contrast, this is not true of Thornbury. Thornbury played an important role in our national history and still retains its historical charm. That is not to say there is no scope for brownfield development to meet local need (see response to question 13). However, the idea that new development in Thornbury could facilitate multi-rise development such as suggested for Bristol fringe, is false. There is no capacity to add additional vehicular traffic to the A38 corridor without thwarting the aim of carbon neutrality. By virtue of separation from services or work places, any development will rely heavily on additional ‘vehicle’ miles, which will counter the aspirations of carbon neutrality by 2030, as no mass transit facilities that are sufficiently attractive to effect a modal shift can be made available. In addition, it must be noted that any development within the Severnvale valley will cause additional ‘run-off’ to the river basin.</p>	19 Feb 2021
Claire Smith	Issue 6 changing shopping habits	26 Feb 2021

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	<p>The closure of high street shops should be seen as an opportunity to regenerate those areas. Residential accommodation above shop units help boost the areas due to amenities in the area. The shops that have closed could be turned into residential units to help the remaining shops.</p> <p>Theme 3 Private amenity spaces Areas surrounding properties should be safe, well lit and as usable as possible.</p>	
Clara Goss - Redrow Homes Ltd	<p>The NPPF places an emphasis at Section 11 on ensuring development makes the best use of land including building at appropriate densities, and on achieving well designed places at Section 12.</p> <p>However, Pegasus raise concern, in the light of Covid, of over-densification of urban areas and an over reliance in the emerging SGLP2020 on apartment led regeneration of existing urban areas.</p> <p>While such a policy approach may result in raised land values to encourage investors and landowners to undertake renewal of areas currently developed at low densities the resulting form of development would rely on shared access, lift and communal facilities with a small balcony as the only private outdoor space available. Access to local service and facilities and local open and green space would be shared with existing occupiers of urban areas.</p> <p>Such an approach leads to an increased population living within a constrained urban area. Covid-19 infection rates have been highest in the UK's city and urban areas, such as Bristol, where policies of high density urban living have previously been pursued.</p> <p>There is an argument that well planned and sustainable new development should future proof homes with regard to future pandemics including space for home working and schooling plus sufficient private space for outdoor recreation and leisure as well as providing access to green infrastructure for walking and cycling. This is especially important for families with children and in order to safeguard the mental health of all residents.</p> <p>Moreover, the Plan provides no evidence that there is adequate social infrastructure including Schools and healthcare facilities to support such development in existing urban areas.</p> <p>It will be necessary for the Council to robustly evidence any Urban Lifestyle approach moving forward with details of delivery trajectories from developers in order not to prejudice the soundness of the Plan in terms of its effectiveness to deliver the quantum of new housing development that will be required.</p>	26 Apr 2021
Clifton Homes (SW) Ltd	<p>Please see accompanying representations referenced:</p> <ul style="list-style-type: none"> <li>• 482 A3 CC 250221 FINAL Local Plan Reps – Land North of Haw Lane, Olveston.</li> </ul>	24 Mar 2021
Colin Gardner - TRAPP'D	<p>This section is quite rightly the most extensive of the consultation document, as the need to re-think Urban Lifestyles is the most pressing in the light of the COVID-19</p>	15 Mar 2021

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	<p>legacy, Climate Change and concern over the impact of poor air quality on health. The key will be to deliver high density dwellings which will require a retained involvement by the Public Sector. Not enough emphasis has been made on this point, or in terms of what the appropriate target numbers for dwellings per hectare would be, whilst ensuring the retention of high quality of living.</p> <p>However, the ‘market towns’ of Yate and Thornbury have been included in your analysis for ‘urban lifestyle.’ There is a marginal case for Yate to be included, in that it has the largest Tesco superstore (multi-storey) and a sizeable multi-storey shopping centre, with an equally sizeable industrial estate, and is spread over an extensive area with a population of 30,000+, and supported by a railway station with direct access to Bristol, Gloucester etc. By contrast, this is not true of Thornbury. Thornbury played an important role in our national history and still retains its historical charm. That is not to say there is no scope for Brownfield development to meet local need (see response to question 13). However, the idea that new development in Thornbury could facilitate multi-rise development such as suggested for Bristol Fringe, is false. There is no capacity to add additional vehicular traffic to the A38 Corridor without thwarting the aim of Carbon neutrality.</p> <p>By virtue of separation from services or work-places, any development will rely heavily on additional ‘vehicle’ miles, which will counter the aspirations of Carbon neutrality by 2030, as no mass transit facilities that are sufficiently attractive to effect a modal shift can be made available. In addition, it must be noted that any development within the Severnvalley valley will cause additional ‘run-off’ to the river basin.</p>	
Crest Nicholson South West Ltd - Land at Harry Stoke/East of Harry Stoke (South)	<p>Urban Lifestyles:</p> <p>Both of Crest’s land interests referred to within this document fall within the Bristol North Fringe area which is identified as an area suggested as appropriate for Urban Lifestyles. On the whole, we support the approach contained within this section of the consultation document and endorse the Harry Stoke area as a sustainable and accessible location for new residential development alongside other supporting uses.</p> <p>Optimising Density:</p> <p>There are competing interests in respect to optimising density and the lessons learnt from Covid in terms of placemaking. It has become evident that the provision of space (including secondary rooms for working from home), green infrastructure and amenity spaces have become central to the delivery of sustainable and resilient new urban places. The pandemic has both highlighted the failures of some of the UK’s main urban centres in achieving this placemaking balance, and is also considered to be fundamentally changing the housing market. Whether the market for urban apartments will be as strong coming out of the pandemic and into the future remains to be seen, however recent evidence of housing transactions during the pandemic has seen a decline in the sale of flats between April - November 2020 and a commensurate increase in the sale of detached properties. If this pattern remained then it could have a significant impact on the desirability of apartments</p>	12 Apr 2021

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	<p>and consequently the density of housing development.</p> <p>Another key factor influencing density and housing mix in South Gloucestershire and the West of England more generally is affordability. We would welcome specific acknowledgement of this within the emerging Plan.</p> <p>Apartments – Addressing Need:</p> <p>The consultation document indicates that the delivery of apartments will be key to this strategy. Before the Local Plan process progresses to the next stage we recommend that the Council commission research on the need, and market demand for, apartments within the urban fringes of Bristol, and South Gloucestershire’s wider urban areas.</p>	
Dan Erben - Thornbury Market Garden	I think it is prejudiced towards actually growing and extending urban areas and gives too much weight to the benefits compared to the disadvantages compared to other areas.	23 Feb 2021
Daphne Dunning - Pucklechurch Parish Council	<p>It is important to ensure that our urban areas meet the needs of our communities. If this can be achieved with sustainable infrastructure, then this development should be looked into. We need to look at affordable housing, in a market that is ever increasing, as well as looking at how we are able to meet the needs of our most vulnerable within our community. Each and every person within our community has the right to be catered for and this should be addressed in the development plans going forward.</p> <p>It was noted how run down some of the urban areas are and how much work is needed to improve them and there should be some consideration around affordable rental for people who are trying to run small businesses.</p> <p>Balconies are nothing new. Thought needs to be considered as to the height of these buildings and not detracting the views from existing properties.</p> <p>See above: Issue No. 21, relates to the optimisation of density and walkable neighbourhoods and it should be made clear that the balance which is drawn must be in favour of improving the human quality of life and the local environment rather than intensification for the sake of meeting targets for housing needs – this makes meeting the challenges outlined in No. 22 of paramount importance and especially those relating to the quality of life in urban areas and associated design issues.</p> <p>It is not clear that all we have learned from the Covid-19 experience has been taken account of - higher densities of people and homes in one space with some only having access to a balcony for personal outdoor amenity use does not speak volumes to the mental-health and physical wellbeing agenda. The imagery used to describe these areas, is homogenous, claustrophobic, soulless and without character - functional at best with no green landscaping to speak of.</p>	08 Apr 2021
David George	It would be interesting to explore a science park type Camus with dense medium high rise apartments incorporating active leisure and an evening economy.	15 Feb 2021

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David Heape	Balconies are nothing new. Thought needs to be considered as to the height of these buildings and not detracting the views from existing properties.	12 Mar 2021
David Redgewell - South West Transport Network and Railfuture Severnside	<p>We welcome the need for urban regeneration and higher densities in the provision of New homes and offices especially in North Bristol around the Cribbs Causeway Patchway new Neighbourhood, Stoke Gifford, and around Bristol Parkway, Filton, Bradey Stoke, Cribbs Causeway shopping centre.</p> <p>East Bristol. Kingswood.</p> <p>Yate can also high density building.</p> <p>Land alongside the Ring Road.</p> <p>Kingswood Town centre.</p> <p>Hanham and Staple Hill.</p>	28 Feb 2021
Debbie Johnson	Concentrate on brown sites and redevelopments before building on new areas.	26 Feb 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 and Transport Vision.</p> <p>We agree with the principal of the urban lifestyles approach, particularly given making the best use of previously developed sites and where possible focusing development within existing urban areas and around transport hubs are both long standing national planning policies.</p> <p>However, not all current and future housing needs and preferences can or should be accommodated within existing urban areas and higher density developments. Delivery of family housing with private gardens in urban locations can be challenging. Provision of balconies is not a comparable alternative to private garden space.</p> <p>Due to higher land remediation costs the delivery of affordable housing can also be challenging on urban sites. Delivery of key infrastructure such as expanding existing Schools or providing new Schools can again be difficult to accommodate within urban areas.</p> <p>Appropriately planning for a Covid-19 world is a strong theme throughout the consultation document. Indeed as highlighted within Issue 22, the Covid-19 pandemic is likely to have changed housing demand and preferences. Early data</p>	19 Mar 2021

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	<p>from the Land Registry and Rightmove is indicating decreased demand for high density flat/apartment dwellings within central urban locations and increased demand for houses in suburban/rural locations with private gardens and a wide range of public open space.</p> <p>There needs therefore to be an appropriate balance between focusing growth in urban lifestyle locations and urban fringe/greenfield locations. As set out within our representations in respect of Building Block 2, appropriately sited urban extensions adjoining the main built up areas can complement the urban lifestyle approach and assist with urban area and town centre renewal.</p>	
Donna Simmons - Emersons Green Town Council	<ul style="list-style-type: none"> <li>• Emersons Green Town Council does not agree with ‘high density’ housing.</li> <li>• Current parking standards should not be reduced.</li> <li>• More provision for cycle parking should be included.</li> <li>• Significant improvements to existing infrastructure and public transport links should be included.</li> </ul>	01 Mar 2021
Douglas Homes	<p>Douglas Homes generally support the Council’s proposed “Urban Lifestyles” approach for the Bristol East Fringe area, within which the site is located. The Consultation document rightly recognises the importance of maximising the uses on previously developed land, particularly in highly sustainable locations and in areas which can accommodate a high density character. Douglas Homes also support the Council’s recognition that there needs to be a flexible approach to certain aspects of design to achieve the higher densities required, such as the provision of car parking spaces, particularly in noting that these sites will be in highly sustainable locations, minimising the need to travel by private car.</p>	24 Mar 2021
EG Carter & Co Limited and Sovereign Housing Association	<p>8. Urban Lifestyles:</p> <p>8.1 In considering how to approach the delivery of development and a strategy for doing so, the Consultation focuses on the concept of Urban Lifestyles. As a matter of principle, the urban lifestyles concept is supported.</p> <p>8.2 The promotion of greater levels of development in urban locations and higher density developments in appropriate locations is supported. The Plan in an overall more environmentally sustainable way, including Climate Change, it is right to place increased emphasis on urban regeneration and use of Brownfield sites, albeit it is also recognised that the development needs of South Gloucestershire cannot be met solely within existing urban areas.</p> <p>8.3 Issue 5 identifies the loss of employment land as an ongoing matter. As highlighted throughout these representations, this trend is not merely a consequence of inadequate planning policies or poor development management decisions, and therefore a change in policy will not radically alter the land use balance in the East Fringe. Rather, market factors have driven this trend with East Fringe neighbourhoods no longer providing attractive locations for employers to locate their businesses, or for employment land investors. This trend will likely continue with the draw of the City Centre and Temple Quarter Enterprise Zone attracting office base sectors including professional service, creative, high-tech, and low Carbon industries. This is anchored on Temple Meads station, as well as cycle,</p>	27 Apr 2021

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	<p>pedestrian network, bus, and waterways transport networks. Issue 5 should therefore include an additional objective to promote sustainable travel patterns from neighbourhoods with reduced employment provision. The LP policy relating to the objective to protect existing employment sites needs to be carefully drafted to allow for a degree of flexibility to respond to changing market conditions and also for the control of development on a site-by-site basis which allows for circumstances whereby robust evidence demonstrates there is little or no reasonable prospect for persisting with the long-term protection of the site for employment use.</p> <p>8.4 A prohibitive policy approach to the loss of remnant employment sites will not reverse this trend, but likely result in sites falling into dereliction, and furthermore prevent opportunities to positively address other sustainable development objectives in the LP including sustainably located housing development and affordable housing delivery. In this context, Theme 1: Optimising density and making efficient use of land is supported.</p> <p>8.5 Theme 4: internal living space standards, which requires development to meet NDSS is also supported by Sovereign Housing and EG Carter.</p>	
<p>Ellandi LLP On Behalf of Crestbridge Corporate Trustees Ltd and Crestbridge T...</p>	<p>Increasing the density of development within urban areas while improving the accessibility of public and private amenity space is important. Revised design policy should be flexible enough to respond to local context and allow private and/or public amenity space requirements to reflect local accessibility to existing and strategically planned green and blue infrastructure. This would allow regeneration proposals for places such as Yate to employ bespoke and fitting levels of provision in response to opening up access to the excellent existing green infrastructure throughout the town, alongside the potential for high quality public realm used for place making which would provide significant new amenity space throughout the town centre.</p> <p>Partnership working will be necessary to secure the wider connectivity needed across Yate to enable walkable/cyclable connecting routes for meaningful active travel options.</p> <p>Page 84 of the Issues and Approaches document identified that lower levels of car parking in the North and Eastern Fringes is considered appropriate. We would also request that Yate is considered appropriate for lower levels of car parking as part of the transformational approach to the regeneration of the Town Centre and wider focus on significant improvements to active travel infrastructure and encouragement of sustainable modes of transport.</p>	<p>05 May 2021</p>
<p>Emma Jarvis</p>	<p>No</p>	<p>28 Feb 2021</p>
<p>Fiona Milden - Vistry Homes Limited</p>	<p>We broadly support and welcome the urban lifestyles approach to new development. The urban lifestyle principles adopt a proactive approach towards optimising development densities, creating well-balanced communities, maximising opportunities for walking and cycling and reducing the need to travel. These principles support the Potential Principles of the Plan which crucially include the aim to “pursue a Carbon neutral and resilient future in a changing climate.”</p>	<p>09 Mar 2021</p>

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Fi Riches	Too contrived - planning should be more organic and subject to change as circumstances change - e.g. the demise of the highstreet as we know it.	09 Dec 2020
Gareth Fielding	No	28 Feb 2021
Gary Parsons - Sport England	<p>Sport England along with Public Health England have launched our revised guidance 'Active Design' which we consider has considerable synergy the Plan. It may therefore be useful to provide a cross-reference (and perhaps a hyperlink <a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design">https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design</a>). Sport England believes that being active should be an intrinsic part of everyone's life pattern. This fits with the Council's proposed approach.</p> <p>Playing fields are one of the most important resources for sport in England. They provide the space for team sports on outdoor pitches, and form part of a network of open spaces and wider green infrastructure in an area.</p> <p>Active Environments - Dedicated sport and leisure facilities need to be co-created, well-designed, supported and maintained to benefit the local community and their users.</p> <p>Good design can help to increase activity levels by encouraging walking and cycling.</p> <p>OUR AMBITION. We want to make the choice to be active easier and more appealing for everyone, whether that's how we choose to move around our local neighbourhood or a dedicated facility for a sport or activity.</p> <p>We also have a contribution to make to tackling climate change by influencing how people live and travel, and through the sustainable planning and design of the nation's sport and leisure facilities.</p> <p>Protecting and improving the nation's sport and leisure facilities by using our investment and expertise to revive places to play, and to innovate new designs and operational models which are community-focused, environmentally sound, financially sustainable and contribute to reducing inequalities.</p> <p>Creating opportunities around community spaces by inspiring local communities to influence owners or increase their own capability to use and sustain these spaces themselves, through advice, training and resources.</p> <p>Helping to create better places to live by influencing those who develop and manage local environments to encourage both formal and informal activity close to where we live, maximising the potential of green spaces and walking and cycling.</p> <p>The implications of climate change. The sport and leisure sector must play its part, so we'll adapt our expertise, guidance, tools and support to help our partners rise to the challenge.</p>	11 Feb 2021

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Hannah Saunders - Dodington Parish Council	<p>Pages 75 to 90 – Urban lifestyles:</p> <ul style="list-style-type: none"> <li>• Members object to presumption of increased housing density despite the acknowledged need for new developments to cater for working at home.</li> <li>• As already stated members feel “Optimising density” is misleadingly optimistic terminology – the meaning here is “increasing density,” so why not be clear and say so?</li> <li>• Members note that the Urban Lifestyles video majors on flats above shops and the like, with the private outdoor space that is acknowledged to be needed being concentrated on small balconies – why is this seen to be desirable, compared to gardens?</li> <li>• It is noted that in Yate one of the town’s most recent dense housing development –Normandy Drive – is seen to be crowded, with an unfriendly layout. Principles are needed to stop this becoming the norm.</li> <li>• Members would also note that local history is that developers promise major infrastructure but do not deliver. Planning Consents need to be tightened to prevent this happening in the future.</li> </ul>	25 May 2021
Hannick Homes	No.	25 Mar 2021
Helen Johnstone - Stroud District Council	<p>SDC support the principles of making the most effective use of land and maximising the potential of brownfield sites within existing urban areas in accordance with the NPPF.</p> <p>Issue 1: limited access, amenity and overspill impacts This is also supported as an opportunity to improve accessibility to services and amenities and promote healthy lifestyles and social interaction.</p> <p>Issue 2: connecting open spaces and landscapes This is also supported as an opportunity to facilitate the multifunctional use of open space with benefits for the use and maintenance of open space and movement corridors.</p> <p>Issue 4: Inequality and deprivation This is also supported as an opportunity to address wider determinants of health priorities.</p>	26 Feb 2021
Ian Leslie	I agree with the further development of existing urban area in order to make life better for those who now reside there. How trying to attract more and more people into the urban areas makes life better for the residents is not understood.	28 Feb 2021
IM Land	43. As set out above, the Urban Lifestyle approach must form part of a balanced portfolio of growth options. The recent pandemic has taught us that densification in urban areas needs to be balanced with delivering recreational space, green infrastructure, and an avoidance of town-cramming to support communities’ health and well-being. The same high standards that are applied to greenfield development	11 May 2021

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	<p>must be applied to urban/Brownfield development. With a greater proportion of people expected to spend some of their time working from home (or locally to home) in the future, this issue is even more important to plan for.</p> <p>44. As explained elsewhere in this representation, it is important that the Urban Lifestyle approach does not reduce the availability of employment land to the detriment of sustaining balanced communities.</p> <p>45. Representations were submitted previously to the level of ‘Urban Living’ that the JSP promoted and a failure to properly understand the social, health and wellbeing consequences. It is hoped that the SGC Plan does not seek to repeat the same concerns.</p>	
IM Land Limited	<p>Please see enclosed submission.</p> <p>6.0 URBAN LIFESTYLES:</p> <p>QUESTIONS 10, 11, 12 &amp; 13:</p> <p>6.1 As previously set out, whilst we support the principle of the Urban Lifestyles approach, it will need to be ensured that the Local Plan 2020 does not place an over-reliance on previously developed sites and land within the urban area. We reserve the right to comment on this further as and when a quantum of development is allocated for the urban area and specific sites are allocated. However, our client would initially note that:</p> <ul style="list-style-type: none"> <li>• Urban and windfall sites are a finite resource. The Council has suffered from a housing land supply shortage and the more readily available/deliverable urban sites have already been developed;</li> <li>• In order to ensure the Plan’s soundness, it should be based on a proportionate evidence base and the level of new homes to be delivered via Urban Lifestyles should be fully evidenced and scrutinised with a proper account of deliverability and viability constraints;</li> <li>• Delivering Brownfield land often involves developers and landowners reviewing and agreeing the viability of development sites with Local Authorities to agree a viable level of affordable housing, public open space and the appropriate housing mix etc in the light of the viability evidence. This should be factored in when considering how the Plan will deliver on its affordable housing requirement; and</li> <li>• While city centre locations and Brownfield sites are the most appropriate place for higher density development, by their nature, urban developments provide a greater proportion of 1 and 2-bedroom apartments and a limited supply of family homes. The consultation document recognises that one response to the Covid-19 pandemic has been that people are seeking a greater level of private amenity space. The SA states that a key sustainability issue for South Gloucestershire is the “Lack of suitable land remaining within existing settlement limits for development causes additional growth pressures in urban areas. This needs to be balanced with achieving a high quality of life and safeguarding our built and natural assets in</li> </ul>	26 Mar 2021

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	urban locations” (Page 31). Accordingly, locations on the edge of settlements where a lower density of development with adequate private and public outdoor amenity space can be provided will be required to supplement the requirement for other types of housing.	
Jack Turner - Patchway Town Council	With regards to Patchway, please ensure you consult with the Town Council and residents as this is very important.	17 Feb 2021
James Carpenter - Falfield Parish Council	No comment.	14 Apr 2021
James Durant - Cotswold Homes	Fully supportive though see previous comments regarding over reliance on the delivery from such an approach.	19 Apr 2021
John Acton	No.	26 Mar 2021
John Mills - Cotswolds Conservation Board	Please refer to our comments on ‘Building Block 1’, in response to Question 7.	16 Mar 2021
Jonathan Edwardes - Pilning and Severn Beach Parish Council	Challenge for High Streets: part one is what to do with vacant retail premises; part two is what to do with the excess parking demands of converting retail to residential multiples and not requiring appropriate parking provision.	26 Feb 2021
Kate Kelliher	Bearing in mind our need for open space.	31 Jan 2021
Katherine Buff	See pages 76 to 112 This section is quite rightly the most extensive of the consultation document, as the need to re-think Urban Lifestyles is the most pressing in the light of the COVID-19 legacy, climate change and concern over the impact of poor air quality on health. The key will be to deliver high density dwellings which will require a retained involvement by the public sector. Not enough emphasis has been made on this point, or in terms of what the appropriate target numbers for dwellings per hectare would be, whilst ensuring the retention of high quality of living. However, the ‘market towns’ of Yate and Thornbury have been included in your analysis for ‘urban lifestyle’. There is a marginal case for Yate to be included, in that it has the largest Tesco superstore (multistorey) and a sizeable multi-storey shopping centre, with an equally sizeable industrial estate, and is spread over an extensive area with a population of 30,000+, and supported by a railway station with direct access to	26 Feb 2021

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	<p>Bristol Gloucester etc. By contrast, this is not true of Thornbury. Thornbury played an important role in our national history and still retains its historical charm. That is not to say there is no scope for brownfield development to meet local need (see response to question 13). However, the idea that new development in Thornbury could facilitate multi-rise development such as suggested for Bristol fringe, is false. There is no capacity to add additional vehicular traffic to the A38 corridor without thwarting the aim of carbon neutrality. By virtue of separation from services or work places, any development will rely heavily on additional ‘vehicle’ miles, which will counter the aspirations of carbon neutrality by 2030, as no mass transit facilities that are sufficiently attractive to effect a modal shift can be made available. In addition, it must be noted that any development within the Severnvale valley will cause additional ‘run-off’ to the river basin</p>	
Kevin Masters	I have read Trapp'd's response and wish to add my name to it.	25 Feb 2021
Lauren Cook - Stride Treglown	<p>UWE Bristol strongly supports the Urban Lifestyles approach as outlined within the Phase 1: Issues and Approaches document. The focus on optimising development to make the most efficient use of land through balancing higher densities with quality of life and environmental factors is considered a sound approach.</p> <p>UWE believes that the approach needs to be bold and ambitious, to support appropriate density and height in the right locations, should enable co-location of residential and employment uses, and should aim to create a ‘sense of place’ based on ‘urban quarters’ with strong design principles.</p> <p>The opportunity to increase the diversity and choice of housing stock with new styles and forms of housing, including apartments and shared types of accommodation is particularly supported, recognising the need to cater for all members of society.</p>	01 Mar 2021
Lee Taylor	Make sure your data is robust and system engineering is used to define requirements before you make decisions	23 Jan 2021
Lesley Brown	<p>Issue 6: changing shopping habits</p> <p>The closure of high street shops can be seen as an opportunity to regenerate those areas. In many other European countries it is common to have residential accommodation above retail units and this helps to boost such areas by the presence of more amenities instead of an area which is turned in to a 'ghost town' after 6. Those shops that have closed could be turned into residential units and in turn it may help those retail shops that are still present. This links in to Theme 2:mixed</p>	15 Feb 2021

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	<p>uses.</p> <p>Theme 3:private amenity spaces I agree that every effort should be made to make areas surrounding properties as useable, well lit and safe as possible.</p> <p>General comments :- I agree that every effort should be made to minimise the impact on existing properties. Health care facilities will need to be increased to cater for an increased population.</p>	
Lizzie Staley	<p>yes Urban Lifestyles within a town, this is expected to be urban, and people chose to live in an urban area. Not a village or smaller settlements in between, people have not chosen to live in those for the Urban Lifestyle.</p> <p>By creating an urban lifestyle out of a village or rural settlement, or market town, you are lowering the standard of living, which Covid has proven to be highly important. It also would add to climate change, not help it.</p> <p>Is Thornbury really Urban? a couple of bus links, two fairly small supermarkets, small places of worship, not a wide variety of ethnicities or their places of worship, not train links, no large shopping centre (what town centre we did have is no being put out of business by closing the high street).</p>	28 Feb 2021
Louise Powell - Thornbury Town Council	<p>Thornbury should not be classified as an 'urban area' and should not be listed on P76.</p> <p>The Town Council feels that there should be a separate category of 'Market Towns' with the same type of questions that are asked for urban lifestyles and rural villages and settlements.</p> <p>It is important to distinguish that Thornbury is not an 'urban area'. Thornbury does not have good transport links such as railway and infrastructure associated with an Urban area. Elsewhere in the plan it is listed as a rural market town and should be considered as one. For example, it does not have realistic prospects of the infrastructure required to be considered an urban area such as a dedicated metro bus link.</p>	08 Apr 2021
Mactaggart & Mickel - Frampton Cotterell	<p>It is important that sites in the urban area are available and developable in realistic timescales.</p>	07 Apr 2021
Mactaggart & Mickel - Pilning	<p>N/A.</p>	25 Mar 2021
Martyn Hall	<p>Why don't you talk in plain English - Thornbury needs a train ASAP and there is a line alimost there which people will use more than buses - listen to the people !!!!</p> <p>You need to get out of the office more and listen to people</p>	26 Feb 2021
Matt Griffith -	<p>46. We are pleased to read about the Urban Lifestyles approach proposed by South</p>	25 Mar

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Business West	<p>Gloucestershire, it represents an innovative methodology that should help to build the resilience, liveability and growth providing more flexibility and a wider range of uses to the land of our the urban areas.</p> <p>47. We particularly welcome the section outlining the main issues facing our urban areas and the particular opportunities that these can offer. We look forward to a more detailed Plan on how these solutions will be implemented, the level of engagement with local stakeholders needed and investment required.</p> <p>48. We also support the themes and urban transformation listed in this section. From this text we find especially relevant the intention to create urban areas with a better optimisation of density, promoting apartments and looking for a mixed use of land to protect employment and jobs. We also believe it is essential that the new housing development can meet the liveable spaces standards with natural light, home-working spaces and access to green areas.</p> <p>o The compliance to all these guidelines will require strong commitment and co-operation between policy makers, Planners and developers. We look forward to new spaces of dialogue between all relevant stakeholders to make this vision a reality.</p> <p>49. Lastly, the proximity to town centres, Public Transport, and cyclable and walkable paths are planning criteria we also feel strongly about and should be prioritised in the Local Plan.</p>	2021
Matthew Blaken - DJ&P Newland Rennie Ltd	Designing out use of the private car is not a solution until appropriate well funded public transport or other solutions are provided. The private car may still be an appropriate transport method subject to 'greener' principles being applied.	14 Dec 2020
Matthew McCollom	The principles are sound. The manner of implementation is the key.	28 Feb 2021
Maurice Wayne	For long term support on the Urban Lifestyle I am of the opinion that growth should come from with in the community. A post office within reasonable distance enables elderly people to remain with in the community.	08 Feb 2021
Michael Wilberforce - Bristol City Council	<p>Bristol City Council notes the proposals for 'urban lifestyles development' with potential locations identified throughout the North and East Fringes of Bristol.</p> <p>Bristol City Council acknowledges development in the North and East Fringes of Bristol could address a broad range of sustainability objectives. These include locating development close to places with a wide range of services, facilities and job opportunities; enabling and supporting new and improved transport infrastructure; encouraging active travel and reducing long distance commuting. For these reasons proposals for 'urban lifestyles' development in these locations could be supported in principle by Bristol City Council subject to careful consideration of the following matters:</p> <ul style="list-style-type: none"> <li>• Infrastructure – Over time, the cumulative development of new homes in North</li> </ul>	26 Mar 2021

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	<p>and East Bristol is likely to necessitate provision of new or enhanced infrastructure relating to transport, education, healthcare, utilities, green infrastructure, decarbonisation and place making. Decisions relating to the location and amount of growth in this area must be aligned with and informed by detailed infrastructure planning at an Authority and West of England level. Development will need to provide the necessary level of investment to accommodate additional infrastructure demands whilst also addressing existing infrastructure issues for the benefit of existing communities.</p> <ul style="list-style-type: none"> <li>• Affordable housing provision – Any land identified for development in these locations will be well related to Bristol. Consideration should therefore be given to the delivery of affordable housing to meet any unmet need from Bristol as determined by the West of England Local Housing Needs Assessment.</li> <li>• Impact on existing communities in Bristol – Any identification of land for large scale development in the vicinity of Bristol’s administrative boundary should include provisions to ensure that any new development addresses the amenity of existing nearby residential communities and that its delivery over time does not result in harmful impacts on those communities.</li> </ul>	
Michelle Greaves	<p>Answer is not "no" but "it depends" - not yes, not no and not unsure.</p> <p>As previously highlighted there is a conflict between between providing less parking in urban developments where facilities are available, against the decline and lack of local facilities. Parking should be reduced areas where there is access to local shops and businesses, but it where there is effective transport links and a sustainable section of local shops, facilities and services (such as schools and libraries) within walking distance. Needs to be a tailored approach rather than a one size fits all. Also developers need to be held to account on what the intentions are and complying with them, rather than cutting corners one planning is consented.</p> <p>In addition reduction of parking in areas such as Thornbury/ Yate where many will commute to jobs outside of the town needs to be taken into account. Jobs are no longer for life anymore, and whilst someone who purchases a house in an urban development may work in the local town, redundancies mean many have to change jobs and commute and need the use of a car. Its not an easy balance to strike, but I think we need to apply caution to mandating any rules on parking allowances and its unreasonable to say someone who lives in an apartment will use a scooter / bike to get to work (this also does not account for anyone with disabilities who may move into the property).</p> <p>Perhaps urban living can be piloted in urban areas in need of regeneration (Filton, Staple Hill etc) first rather than in wealthy areas such as Thornbury and Yate? This will also help tackle the HMO issue creeping up in areas such as Filton, but needs to be done in collaboration with the university (if they made their current urban living flats on site more affordable, more students may stay on site)</p>	03 Feb 2021
Midland Commercial	<p>Please see enclosed submission.</p> <p>4.29 We welcome much of the content of this section in encouraging appropriate</p>	26 Apr 2021

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	reuse of previously developed land. Much of the section concentrates on increasing the density of our urban areas in South Gloucestershire to accommodate new housing. As mentioned elsewhere, it will be particularly important to monitor and have regard to the scale of employment land being lost to other uses most notably residential development. It may very well be appropriate to provide new employment development to compensate for that lost to other uses.	
Mike Bennewitz	As mentioned Thornbury should not be classified as Urban	23 Feb 2021
Mr. A. D. England	<p>Please see enclosed submission.</p> <ul style="list-style-type: none"> <li>• Whilst our client broadly supports the principle of the Urban Lifestyles approach, it will need to be ensured that the Local Plan 2020 does not place an over-reliance on previously developed sites and land within the urban area – the unintended consequence of which would be a non-resilient housing land supply, lack of affordable housing provision, loss of employment land and job opportunities and a lack of range and mix of housing;</li> </ul> <p>6.1 As previously set out, whilst we support the principle of the Urban Lifestyles approach, it will need to be ensured that the Local Plan 2020 does not place an over-reliance on previously developed sites and land within the urban area. We reserve the right to comment on this further as and when a quantum of development is allocated for the urban area and specific sites are allocated. However, our client would initially note that:</p> <ul style="list-style-type: none"> <li>• Urban and windfall sites are a finite resource. The Council has suffered from a housing land supply shortage and the more readily available/deliverable urban sites have already been developed;</li> <li>• In order to ensure the Plan’s soundness, it should be based on a proportionate evidence base and the level of new homes to be delivered via Urban Lifestyles should be fully evidenced and scrutinised with a proper account of deliverability and viability constraints;</li> <li>• Delivering Brownfield land often involves developers and landowners reviewing and agreeing the viability of development sites with Local Authorities to agree a viable level of affordable housing, public open space and the appropriate housing mix etc in the light of the viability evidence. This should be factored in when considering how the Plan will deliver on its affordable housing requirement; and</li> <li>• While city centre locations and Brownfield sites are the most appropriate place for higher density development, by their nature, urban developments provide a greater proportion of 1 and 2-bedroom apartments and a limited supply of family homes.</li> <li>• The consultation document recognises that one response to the Covid-19 pandemic has been that people are seeking a greater level of private amenity space. The SA states that a key sustainability issue for South Gloucestershire is the “Lack of suitable land remaining within existing settlement limits for development causes additional growth pressures in urban areas. This needs to be balanced with</li> </ul>	29 Mar 2021

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	achieving a high quality of life and safeguarding our built and natural assets in urban locations” (Page 31). Accordingly, locations on the edge of settlements where a lower density of development with adequate private and public outdoor amenity space can be provided will be required to supplement the requirement for other types of housing.	
Mr. Blake - Oldland Parish Council	No	17 Feb 2021
Neil Oviatt	<p>I agree with large scale free standing new settlements with infrastructure built first rather than just bolting on thousands of new homes where the road system is not designed to cope with the volume.</p> <p>I also disagree with the notion that we need Metro routes across the region when current bus services are not running at 50% and never have been! this is not due to COVID! cutting up countryside for Metro lanes is economically ridiculous and harmful to wildlife.</p>	30 Nov 2020
Nicholas Small - Stagecoach West	<p>Densification and making best use of land within the current built-up area obviously needs to be one of the starting points in a sequential approach to identifying development potential in the Plan area. Such a structured approach is mandated by NPPF. It is also one that is most likely to be able to identify development sites that from the very outset are furnished with a range of reasonably good sustainable transport choices.</p> <p>However there are two very strong caveats to be made in the context of South Gloucestershire.</p> <ul style="list-style-type: none"> <li>• Council very rightly recognises that the number of such sites available and the development quantum they could reasonably offer is likely to be constrained. Most of the existing urban areas within South Gloucestershire post-date 1965 and over the last 20 years, strong development pressure and a long-standing focus on developing previously-developed land first has identified and brought forward most of the identifiable larger sites most of which have been released by restructuring and consolidation of large institutions such as UWE and the health service.</li> <li>• The abnormal costs associated with such redevelopment tend to be higher and the Council will need to be able to present robust evidence on viability.</li> <li>• Such sites tend to be “opportunity led” not transport-led. A site’s previously-developed status does not ipso facto place it alongside good sustainable travel choices including bus routes. Frenchay Hospital is a great example of a site where the range and frequency of bus services is not particularly attractive. Hortham Hospital, as a PD site in the Green Belt, is even more problematic, requiring diversion of services from the main A38 Public Transport spine that offer relatively little to residents while only undermining the overall offer for most of the public. It cannot be assumed that previously-developed land will be consistently or able to support radically higher levels of sustainable transport use: each opportunity will need to be carefully screened to ensure that the opportunities for sustainable transport offer credibly realistic choices that will be competitive with car use. This</li> </ul>	01 Mar 2021

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	goes way beyond the simple binary question typically used: “is there a bus route within 400m” being one of them.	
Nick Woodward	This is key to overcome mistakes of the past. Traditional town centres will continue to die as shopping habits change and should not just be used during working hours but amalgamated with living accommodation. These areas would be sustainable and are likely to already have health care, leisure and support services within easy reach, thus reducing reliance upon the car for long distance travel for the majority of the population living in these urban areas.	28 Feb 2021
Nicola Flack	The lack of facilities in for example the new developments in Thornbury is woeful for people who have moved there.	31 Jan 2021
Nicola Jordan	Whilst all areas should be considered there is insufficient detail to comment on.	25 Feb 2021
Nicola O'Connell	I'm alarmed with the suggestion of further development of market towns. Thornbury in particular has seen enough building over the past few years and is at capacity. Further building into greenbelt land will destroy its character and additional cars will effect the idea of carbon neutrality.	27 Feb 2021
North Thornbury Landowners Consortium	An over-reliance on the provision of apartments may not match market demand and recent housing transactions seem to show that after the Covid pandemic there may be a paradigm shift in the housing market away from apartments other than in city-centre locations.	29 Apr 2021
Patrick Williams	The principles seem acceptable, as long as more priority is placed on the environmental and countryside aspects. South Glos must not be turned in to 'Greater Bristol' with the associated destruction to the countryside.	09 Mar 2021
Paula Evans - Rangeworthy Parish Council	Refer to our answer in question 9.	26 Feb 2021
Pauline and Richard Wilson	Recent changes to shopping habits and use of the High Street will mean that buildings become vacant for change of use. Some of this will become converted for housing. These will be in good communication centres and should be encouraged. We are not sure that this has been mentioned in the Plan and may affect calculations.	25 Feb 2021
Persimmon Homes Severn Valley	Please see attached document.	11 May 2021
Peter Box	I think that even the consideration of Urban Lifestyle in the context of South Gloucestershire is inappropriate. With the possible exception of Yate (once a small market town but sadly raped and defiled long ago) South Gloucestershire is essentially a rural area NOT URBAN.	23 Feb 2021
Peter Rawlinson - Gleeson Strategic Land	Gleeson agrees that urban areas are likely to be able to support a higher density than more rural areas. However, if the Local Plan does set a 'density range' for allocated urban sites they will need to be supported with evidence and will need to be realistic so that the right amount of growth is assumed. If sites do not achieve the expected density, this will reduce the number of new homes that can be provided in urban areas and could impact negatively on housing delivery rates.	10 Mar 2021

<b>Respondent Name</b>	<b>User Response: Text</b>	<b>Response Created</b>
Progress Land Ltd	<p>Thornbury challenges include supporting the town centre and key services and facilities whilst also respecting its character and setting. The delivery of a new garden village in close proximity will help provide stronger resilience, jobs and also transport services to key infrastructure.</p> <p>Commentary in the emerging NDP for Thornbury refers to Buckover land promotion but does not take account of it in its evolution. If the wider area and garden village is supported in the emerging Local Plan then it would be appropriate to reconsider the NDP policies which is sensible in terms of housing growth requirements.</p> <p>It is important therefore to reflect in the urban lifestyle approach this credible building block option given the land is outside the Green Belt and appropriately located and sized to deliver new employment opportunities and facilities of its own. The inclusion of new employment at Sycamores/Buckover will help reduce the need to travel to Bristol and elsewhere and help re-balance the movements to and from Thornbury. The development will also help improve accessibility on the A38 and invest in Public Transport/non-car modes to access the North Fringe employment opportunities. This includes assistance with funding to reopen the station at Thornbury.</p>	11 May 2021
R. Brown	<p>Issue 6, Changing shopping habits With the closure of high street shops due to on-line shopping and major shopping centres like Cribbs Causeway empty high street shops should be considered for reallocation to housing. This would help regenerate the centres and support local shops, restaurants and other such facilities as people would be using them. Rather than creating more housing and shops in new locations utilise the existing areas. This would reduce the impact on the environment and be a more cost effective way of providing housing. This also relates to theme 2, mixed uses.</p> <p>Theme 3. Private amenity spaces I agree that surrounding areas of properties should be well lit, safe and useable.</p>	25 Feb 2021
Rebecca Woodward	<p>Town centres in the traditional sense are dying and should not just be used during the day. Developing in these locations so that they combine dwellings and services are essential. These areas are sustainable with health care, leisure and support services within easy reach, negating long distance travel for the majority of the population to access them.</p>	28 Feb 2021
Redcliffe Homes	Please see enclosed representations.	01 Jun 2021
Redrow Homes (SW)	<p>Please see enclosed representations.</p> <p>3.4 We acknowledge and support a further strategy that focuses on these two key options. However, it must be accepted that the more intensive use of existing land within existing Urban Areas can only go so far, and capacity constraints will mean that this source of supply will not be able to meet the overall housing needs that the WoE SDDS, and consequently the SGLP, will be required to accommodate.</p> <p>3.5 The work previously undertaken by NASH Partnerships ‘Maximising the potential of Urban Living,’ whilst a good starting point, was only ever designed to</p>	29 Apr 2021

Respondent Name	User Response: Text	Response Created
	<p>be a high-level assessment of potential land available in support of the JSP. As the SGC Local Plan is now focusing on site-specific allocations, it is our view that this should be further developed to identify specific sites that are capable of redevelopment or existing committed sites where it is appropriate to increase densities.</p> <p>3.6 Not all urban areas will be appropriate locations within which to elevate densities above the levels we have recently seen. The COVID-19 pandemic has highlighted the need to provide dwellings with both sufficient internal space within which to work from home, and also suitable outdoor space. It is striking how the rates of infection have been so high in densely populated areas and the trend towards a greater prevalence of viruses in society, linked to increasing rates of ineffectiveness in antibiotics and other treatment we rely on to combat these viruses, may continue and planning for more densely populated areas may not be the best response to this.</p> <p>3.7 Separate to this there had already been a trend towards consumers demanding private garden space for their health and wellbeing. Specifically, Redrow have seen strong demand for their Heritage homes as a response to the recent lockdowns and their desire for more garden area and space for home working.</p>	
Richard Bentham	Please promote motorcycles as a mode of efficient, low pollution, less congested commuting. Your plan mentions them twice. Not good enough! Provide secure parking & promote awareness with roadside poster campaign. Your report often states the commuting/shopping distances are too far or difficult to walk. Cycling is suitable for some people travelling a few miles. Not everyone is able to cycle. With new development looking to reduce car parking then more 2 wheelers instead of cars can achieve this	26 Jan 2021
Richard Lloyd	<p>I welcome the Urban Lifestyles approach to development, redevelopment and reuse across appropriate parts of South Gloucestershire's urban areas, optimising development and making the most efficient use of land in a way that ensures that the major urban centres, town centres and high streets can continue to thrive and prosper.</p> <p>This is a very challenging agenda. Each of the areas noted where this approach might be applied is different. I agree that each location merits a bespoke set of Local Plan policies, and where the scale of change envisaged is significant that detailed masterplans should be drawn up. Across all locations, high quality development in terms of design and sustainability should be the norm alongside enhancements to the public realm.</p>	03 Mar 2021
Richard Pendlebury - Anchor Society	<p>It is clear that we need new approaches to urban living - greener, more connected and multiple uses in close proximity.</p> <p>I believe that design is key to this:</p> <ol style="list-style-type: none"> <li>1) People need a sense of place and community - how will this be achieved?</li> <li>2) Given that most of us live in urban environments it is the quality of the surroundings which is important. Poor quality housing and a lack of facilities leads to poor expectations and life chances.</li> </ol>	22 Feb 2021

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	3) As the recent Covid 19 crisis has demonstrated, access to green space within urban areas is of great importance.	
Richard Walker - Lightwood Strategic	<p>The evidence base for the Local Plan should provide robust data on the assumed delivery of additional housing on previously developed land within existing urban areas. Consistency in the methodological approach between South Gloucestershire Council and Bristol City Council, especially within the North and East Fringe, is advisable given the wider SDS context. The higher the risk profile of the assumptions, the more greenfield flexibility will be needed in the Local Plan. One assumes that such an evidence base will have utility as part of the preparation of the West of England Combined Authority's SDS. Bristol City Council's Urban Potential Assessment (2018) appears to present a potential approach, but this did not provide full disclosure of site-specific assumptions making public evaluation difficult (i.e. maps accompanying lists of potential sites).</p> <p>The Council explicitly has to be seen to be optimising the recycling of urban land at Examination, but equally it will get into difficulty if its capacity assumptions are high risk/low probability and the Plan as a whole is not flexible enough to deal with lower than anticipated yields.</p> <p>It is not clear how potential urban lifestyle locations (the purple 'blobs' drawn around the centres) have been identified. A baseline minimum buffering methodology seems to have been applied, with occasional manual adjustment.</p> <p>Sometimes the blobs are stretched out in one direction more than they are in another. The Emersons Green District Centre blob stretches into Lyde Green more than it stretches into Emersons Green itself. A further manual adjustment truncates what the buffer would be like if the Green Belt was not factored in. All of Rock House Farm, Shortwood would be within the sphere of Emersons Green (on the basis of the Lyde Green 'stretch') without such an adjustment. Some of the site would still be within the sphere of Emersons Green without a Lyde Green 'stretch.'</p>	01 Jun 2021
Robert Harris - Olveston Parish Council	<p>The approach adopted seems to be a positive way forward and could ensure best use of the available land and facilities. It will be important that a 'one size fits all' approach is not imposed on what are obviously areas with different needs. The use of brown field sites to their greatest extent must be encouraged but this does not mean exclusively housing. Where possible such land could be used for open and public spaces to enhance the local community. Where this is not possible because of the location or condition of the land it will be extremely important that this land is not just left as an unusable site to blight the area. It will be particularly important that sympathetic development of our town centres and high streets is included from day one so as to ensure that they retain their vibrancy and thrive.</p> <p>Care should be taken where public access sites are developed, e.g., parks, playgrounds, allotments etc. that the local population are involved physically in their development so they "own" the development. In this way there is a better chance of it being used and cared for.</p>	26 Feb 2021
Robert Hitchins Ltd	Please see enclosed submission.	01 Jun 2021

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Robert Hitchins Ltd and Harrow Estates PLC	<p>Please see enclosed submission.</p> <p>We broadly support the principal of the Council’s Urban Lifestyles approach, but the new Local Plan will need to ensure it is not subject to an over-reliance on the delivery of Brownfield land. We would initially note the following:</p> <ul style="list-style-type: none"> <li>• There is an insufficient supply of urban land and windfall sites available. In order to ensure the new Local Plan is able to meet identified housing provision requirements via the Council’s Urban Lifestyle approach, a robust supporting evidence base is necessary. This should reflect the strategic housing land availability assessment which provides specific details regarding deliverability, anticipated timescales and viability constraints;</li> <li>• Any future strategy should have regard to the timescales associated with bringing forward Brownfield sites in order to identify a robust capacity for South Gloucestershire’s existing urban area and appreciation for historic delivery rates to ultimately establish realistic expectations regarding Brownfield regeneration.</li> </ul>	01 Jun 2021
Robin Perry	Urban areas both existing and new development should focus on creating a complete community with local jobs and services to minimise the need for commuting and reduce traffic congestion and pollution.	21 Feb 2021
Robin Winfield	Brown field sites should be used first.	19 Feb 2021
Roger Avenin	If we are forced to build an excess of housing then we must look to build upwards/ higher due to land availability being at a premium.	20 Feb 2021
Roger Hall	See TRAPP'D response.	25 Feb 2021
Rosalyn Pyle	<p>More creative housing is required in nearby Kingswood. The shopping centre and high street is run down and depressing. More investment should be focused on this area – there are only two Parks in Kingswood – the high street should be pedestrian access only as air quality is already poor. More attention should be given to regeneration and creating accommodation near to these local amenities for individuals, professional couples and families.</p> <p>Kingswood is well served with supermarkets – the recent Lidl supermarket is a site that I believe could have been used for housing development. The Sainsburys and Wilkinsons stores are well established. In order re-establish a thriving high street with independent traders, perhaps the Council should stop building supermarkets</p>	28 Feb 2021
Sam Scott - South Glos Labour Group of Councillors	<p>The plan prioritises urban areas for development, but questions how much space there is within urban areas, and how much actual housing capacity there is in urban areas.</p> <p>Urban Development- there is a focus here on high spec properties which of course cost more and make it more likely for developers to argue they can’t deliver affordable housing.</p> <p>On page 80, the plan talks about inequality and deprivation but there is no mention of investment in “levelling up”.</p>	02 Mar 2021

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	<p>The plan talks about apartments in urban areas, which would be multi storey developments, but it also needs to think about access to green space, public or private outdoor space, and homes that are conducive to home working – Covid 19 has shown the necessity of both access to outdoor space and sufficient indoor space for home working.</p> <p>Mixed use viability – for housing and employment, but local developers don't deliver land for employment purposes. We need to be planning for homes near employment hubs.</p> <p>Page 84 – What the plan says here implies that a lower level of parking is appropriate in priority neighbourhoods, whereas minimum car parking standards for leafy areas. The current Metrobus does not link many priority neighbourhoods with employment or educational hubs.</p> <p>Urban lifestyles housing – what are the numbers?</p> <p>Page 93 – the plan fails to mention pocket parks which provide a lifeline for many people.</p> <p>Page 94 – Very little support for employment opportunity.</p>	
Sarah Hardcastle - Friends of Ridge Wood	Sounds ok for some areas, but need to ensure development is in keeping with the existing settlement	28 Feb 2021
Sara May	<p>Your vision of an ideal “Urban living” scenario pretty much describes the old Thornbury (the town built before the new housing estates were added in the last 9 years) which having many different styles and ages of housing from the 18th century up 2010 and though not particularly posh all incorporate quality public space and walks and an abundance of linking direct pathways for walking and cycling which also serve as wildlife corridors BUT the new estates built since 2013 on the north and east edges of town markedly do not share these features. In these estates tarmac and accommodation to the car seem to be the main drivers. They do have some green space and this has been very much appreciated in lockdown by their residents but these tend to be islands of green space in the midst of the tarmac dominated estate. They definitely don't have any direct ways or short cuts to get about by foot or bike safely as are integral in the older part of town.</p>	01 Mar 2021
Simon Fitton - YTL Developments (UK) Ltd	<p>YTL fully endorses the benefits identified under the seven key issues. The challenges are equally well recognised but these must be weighed against an appreciation that many of those challenges can be overcome. All of the challenges are capable of resolution through careful design but it is incumbent on the new Local Plan to establish clear policies that reflect a deviation from current adopted standards in relation to matters such as parking, open space and private amenity. A relaxation of such standards is appropriate given the likely availability of facilities, urban parks, and Public Transport accessibility ‘on the doorstep’ within existing urban areas. The references to an emphasis on the quality of the public realm and open spaces within and in proximity to a site are a welcome reference; it is clear it would not be appropriate to apply the rather blunt quantitative standards set out in</p>	16 Mar 2021

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	<p>current policy.</p> <p>The ‘overspill’ elements that are described in the issues are highly relevant but will need to be seen in the context of each individual development proposal. In the case of the Brabazon development at the former Filton Airfield, the site is of such a scale that all stakeholders can be confident that surrounding neighbourhoods and communities will only benefit from increases in density (e.g. through significant investment and improvement in Public Transport accessibility, education and healthcare provision, and a wider mix of commercial uses).</p> <p>It is a matter for the Council and this Local Plan to determine whether each urban location be subject to a specific density range is appropriate (Theme 1). The approach is logical to a degree but an emphasis on achieving high quality placemaking through careful, innovative and appropriate design can also set the necessary controls without being unnecessarily prescriptive at Plan making stage.</p> <p>Ensuring that every property has access to some form of amenity space is a laudable objective. Again this objective must be balanced ‘in the round’ and some flexibility must be built into any such standards. In the case of a large scale development such as Brabazon at the former Filton Airfield, there should be scope to consider the applicability of such standards when assessing what is proposed for the development as a whole. For example, where there is ready access to high quality public space as part of a carefully planned development, then requiring every property to have private amenity space may not always be necessary. Certainly setting a minimum standard for every property to adhere to is likely to lead to unhelpful conflicts and compromise that could affect the quality of immediate built and natural environment. If such standards are to be imposed, deviation from such prescription should be allowable on a site by site (or block by block) basis.</p> <p>Applying rigid standards is not always helpful in achieving high quality placemaking and some flexibility in policy formulation is undoubtedly necessary. It is equally important to consider the role of communal amenity spaces in any assessment; such spaces can offer a greater quantum and quality of private amenity space to households in blocks of apartments compared to any rigid standards for balconies and the like.</p>	
Simon Moore	There should be no further development or expansion of our urban areas.	28 Feb 2021
Simon Steele-Perkins - Waddeton Park Limited	Fine, provided the assessment of the scale of the opportunity takes proper account of the need to promote and maintain a mix of uses consistent with short trip lengths and equitable accessibility, the maintenance and enhancement of green infrastructure (for the benefit of urban wildlife and public access and movement), and the retention of employment rather than allowing sites to be displaced by housing; and involves a realistic assessment of deliverability.	06 May 2021
Sophie Spencer - CPRE Avon and Bristol [South Gloucestershire	<p>CPRE is very supportive of this change in emphasis, better use of our urban space is the key to overcoming the mistakes of the past:</p> <ul style="list-style-type: none"> <li>• The higher the density, the more land is saved: space is used more efficiently.</li> </ul>	02 Mar 2021

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District]	<ul style="list-style-type: none"> <li>• The higher the density, the bigger range of shops and services that can be supported.</li> <li>• Local energy schemes become feasible.</li> <li>• Of most significance is the cost of personal transport which diminishes rapidly as density increases.</li> <li>• Better transport means better access to jobs, amenities, leisure, etc. At high densities fast, frequent, reliable public transport systems become fully effective with dramatic reductions in energy &amp; costs.</li> <li>• As density increases the per capita cost of providing services such as water, gas, electricity, and waste disposal reduces.</li> <li>• The cost of transporting materials and goods also declines. As the costs go down so does the consumption of energy.</li> <li>• As density increases, isolation and social exclusion is reduced for people without a car.</li> <li>• Density can also impact on affordability as the cost of land is lower per dwelling, and space is not needed for parking cars.</li> <li>• Higher density creates more vitality and diversity. “Bigger concentrations of people stimulate and support the provision of more services and facilities making possible a wider choice of restaurants, theatres, cinemas, and other recreational opportunities. They support specialist centres and services for minorities, which are not possible where such minorities are dispersed in low density sprawl.</li> <li>• In turn all this stimulates interdependent economic development that creates new employment opportunities and greater choice of employment.</li> <li>• Above all, in higher density urban areas, all this diversity is within easy reach of where most people live. Ease of access is a key factor, which has critical implications for a sustainable quality of urban life.</li> </ul> <p>Higher density as CPRE has long argued, does not come at the expense of achieving higher standards for internal space or beauty and we welcome the declared intention to extend the scope to include private developments.</p> <p>Many urban commercial areas are wasteful of space, large surface car parks that lie unused for large parts of the day and single storey buildings. There is scope for reassessing these areas for homes in the same way as high streets.</p>	
South West Housing Association Planning Consortium (HAPC)	<p>New Urban Lifestyle themes: Theme 4: Internal living space size:</p> <p>If the Council seeks to require the Nationally Described Space Standard (NDSS) across all residential development on New Urban Lifestyles’ developments, it must be demonstrated that it is being done to address a clearly evidenced need, as set out in Planning Practice Guidance (Paragraph: 002 Reference ID: 56-002-20160519). In the absence of this evidence, the application of NDSS might undermine the viability of development schemes and through viability testing of application proposals, will result in fewer affordable homes being delivered across South Gloucestershire. The NDSS is not a building regulation and remains solely within the planning system as a form of technical planning standard. It is not therefore essential for all dwellings to achieve the standard in order to provide good quality living. For affordable housing in particular, there may be instances where achieving NDSS is impractical and unnecessary.</p>	14 May 2021

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	<p>We recommend that the Council reviews the Local Plan viability assessments with regard to these matters in accordance with the PPG tests which require that where a need for the standards is identified, Local Planning Authorities should justify inclusion of a policy, taking account of need, viability and timing:</p> <ul style="list-style-type: none"> <li>• “Need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.</li> <li>• Viability – the impact of adopting the space standard should be considered as part of a Plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local Planning Authorities will also need to consider impacts on affordability where a space standard is to be adopted.</li> <li>• Timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.”</li> </ul> <p>(Paragraph: 020 Reference ID: 56-020-20150327)</p>	
South West Strategic Developments (SWSD)	<p>Please see enclosed representations.</p> <p>8.13 As set out, we wholly agree with prioritising Brownfield land opportunities within existing urban areas. Our key concern with the Urban Lifestyles approach at this stage would be that SGC are relying on this option to deliver a significant proportion of growth, without (in our view) actually putting forward an approach for how this land will be identified and the overall numbers of homes that could be delivered robustly identified. A detailed assessment of this issue is needed urgently so the Council has a clear idea of the scale of growth that needs to be accommodated via other development options.</p> <p>8.14 We acknowledge that there will always be Brownfield opportunities which come to fruition throughout the Plan period which were not identified in the Local Plan, and this can be hard to plan for now. Yet the wording within the document is extremely vague and we are concerned that this will remain the case as the Plan progresses which will not give a direction on how much greenfield land, for example, is needed to ensure the development needs of the area are met.</p> <p>8.15 We therefore require clarification that the identification of sites that will form part of the Urban Lifestyles approach will come from a clear evidence base which sets out available land opportunities (evidenced in the Call for Sites) and a realistic/ thorough masterplanning process which can set out a clear number of homes that can be delivered via this source of supply.</p>	31 Mar 2021
St. Modwen Developments and The Tortworth Estate	We support this approach and its underlying principles.	05 Mar 2021
Stephen	Urban life style is severely compromised when development goes ahead without	26 Jan

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Hickmans	massively improving amenities such as water pressure, drainage and electricity supply. These amenities are very poor within Coalpit Heath and no consideration was given on the previous spacial plan.	2021
Steve Seward	Existing Urban Areas have already been extensively exploited over many years, however some of these are now suffering from bad design at the expense of low cost, high profit drivers. It would be reasonable to assume that people living in these areas would welcome a level of sympathetic refurbishment that would enhance their lifestyle, however this is unlikely to satisfy our ongoing population growth issue alone.	13 Feb 2021
Sue Green - Home Builders Federation	The Council has identified 6 Lifestyle Themes, which are (1) Optimising density and making efficient use of land, (2) Mixed uses, (3) Private amenity spaces & public realm, (4) Internal living space size (NDSS), (5) Adaptability, views & natural light and (6) Reduced car parking.  The Council is referred to the HBF's answer to Question 7 above on optimising density and making efficient use of land. As set out above, the Council's Urban Lifestyle approach should not revert to an overly ambitious intensification of site densities. It is critical that the Council's approach is robustly evidenced and supported by parties responsible for delivery of housing.  Under Lifestyle Theme (4) if the Council wishes to apply Nationally Described Space Standards (NDSS) to new build dwellings, then this should only be done in accordance with the 2019 NPPF (para 127f & Footnote 46). Footnote 46 states that "policies may also make use of the NDSS where the need for an internal space standard can be justified". As set out in the 2019 NPPF, all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focused tightly on supporting and justifying the policies concerned (para 31). The NPPG sets out that "where a need for internal space standards is identified, the authority should provide justification for requiring internal space policies. Authorities should take account of the following areas need, viability and timing" (ID: 56-020-20150327). The Council should provide a robust local assessment evidencing its case (see HBF answer to Q18 below).  With reference to Lifestyle Theme (6), the Council is referred to the HBF's answer to Question 27 below on car parking standards.	05 Mar 2021
Sue Simmons - Westerleigh Parish Council	No comments.	23 Feb 2021
Susan Smith	No	16 Feb 2021
Swanmoor Stoke Ltd	Please see section 8 of the accompanying Representation.  Urban Lifestyles is a sensible concept to support the delivery of further growth within the urban areas. However, this should also be considered in a wider context and many of the same principles could be adopted in the delivery of a new garden community. There is synergy with a number of the principles being promoted at Swanmoor Stoke, which could also help support the delivery of Urban Lifestyles in	06 Apr 2021

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	<p>the North Fringe through improvements to strategic infrastructure and connecting key recreational and employment assets.</p> <p>A holistic approach will play an important role in delivering a sustainable Spatial Strategy which considers the geography of existing key assets and how to make effective use of them.</p>	
Taylor Wimpey UK Ltd - Land at Mangotsfield	<p>SECTION 6 – URBAN LIFESTYLES:</p> <p>The ‘Urban Lifestyles’ section of the Plan explains that it sets out a proposed new approach to development in some urban areas. It is not clear how this standalone section relates to the previous Spatial Strategy section (specifically the identification of the first ‘building block’ - focusing development in existing urban areas). Clarification is sought as to whether there is a distinction between the areas identified in the Urban Lifestyles section and those referred to under the first ‘building block.’ If the Urban Lifestyles section is providing further detail for how the first building block will be realised this needs to be made more explicitly clear in the document, as the approach (and evidence of the suitability and capacity for ‘urban lifestyles’ development, will likely have a significant impact on the final Spatial Strategy).</p> <p>The principle of part of the development strategy being to deliver growth in existing urban areas/settlements is supported generally accepted, and accords with relevant policy, guidance and good practice. However, as set out in relation to the first building block, there is likely to be insufficient capacity within urban areas to accommodate the level of growth needed in the District, and other development locations will need to be identified. The level of growth planned for as part of Urban Lifestyles must be derived from a very robust evidence base, at present there does not appear to have been anything presented to explain what the potential capacity is in existing urban areas. In addition to the concerns raised above in relation to over reliance on Brownfield sites, it is important that scheme viability is properly considered if this is a key source of delivery in the Plan. Brownfield sites will usually require additional time and cost in order that they are remediated and are available for new housing development, and there are often constraints on the type and scale of development which can be achieved, and the areas of the housing market which these products will be attractive to. It is not clear from the existing evidence base supporting both the sub-regional and local policies that viability has properly been considered (it is essential that this is fully done through subsequent stages of the Plan).</p> <p>Whilst it is not completely clear how this section of the document relates to the building blocks we do support the identification of the East Fringe as a key location suitable for accommodating additional development in the new Plan period. We support the intention to ‘investigate further growth and change’ in urban areas including the East Fringe as it is a key location within the existing and future settlement hierarchy for South Gloucestershire. Where relevant this can include consideration of how ‘urban lifestyles’ development may be appropriate, but if this is solely part of an approach to use of existing urban sites, then there are likely to be only limited Brownfield options available on the urban edge of Bristol, and the main potential for additional growth will be on sites adjacent to the existing urban</p>	20 Apr 2021

Respondent Name	User Response: Text	Response Created
	<p>edge.</p> <p>Taylor Wimpey's land interests at Mangotsfield lie to west of the A4174 Ring Road, set back from this route by land currently in use for playing pitches. The site directly adjoins the existing settlement boundary and is in close proximity to the existing facilities and services within the built up edge of Bristol. The only current barrier to development of the site is considered to be its historic inclusion within the Green Belt, the designation of this site does not meet the Green Belt purposes and does not reflect the position 'on the ground' where the site is contained on all sites by existing development. There are no technical or environmental reasons why this site could not be released for residential development, the development of the site would form a logical extension to the existing urban area of greater Bristol.</p>	
Taylor Wimpey UK Ltd - Land at Vilner Farm	<p>The 'Urban Lifestyles' section of the Plan explains that it sets out a proposed new approach to development in some urban areas. It is not clear how this standalone section relates to the previous Spatial Strategy section (specifically the identification of the first 'building block' - focusing development in existing urban areas). Clarification is sought as to whether there is a distinction between the areas identified in the Urban Lifestyles section and those referred to under the first 'building block.' If the Urban Lifestyles section is providing further detail for how the first building block will be realised this needs to be made more explicitly clear in the document, as the approach (and evidence of the suitability and capacity for 'urban lifestyles' development, will likely have a significant impact on the final Spatial Strategy).</p> <p>The principle of part of the development strategy being to deliver growth in existing urban areas/settlements is generally accepted, and accords with relevant policy, guidance and good practice. However, as set out in relation to the first building block, there is likely to be insufficient capacity within urban areas to accommodate the level of growth needed in the District, and other development locations will need to be identified. The level of growth planned for as part of Urban Lifestyles must be derived from a very robust evidence base, at present there does not appear to have been anything presented to explain what the potential capacity is in existing urban areas. In addition to the concerns raised above in relation to over reliance on Brownfield sites, it is important that scheme viability is properly considered if this is a key source of delivery in the Plan. Brownfield sites will usually require additional time and cost in order that they are remediated and are available for new housing development, and there are often constraints on the type and scale of development which can be achieved, and the areas of the housing market which these products will be attractive to. It is not clear from the existing evidence base supporting both the sub-regional and local policies that viability has properly been considered (it is essential that this is fully done through subsequent stages of the Plan).</p>	20 Apr 2021
Theodore Butt Philip - South Gloucestershire Liberal Democrat Council Group	Yes we believe there is potential, though greater density use of urban areas, to provide more sustainable development, however it is important to ensure that this does not undermine the quality of life for South Gloucestershire residents and increased densification by itself, is not enough to make transport and other facilities viable.	12 Mar 2021

Respondent Name	User Response: Text	Response Created
	<p>It is essential that we develop models of transport, infrastructure and service provision which enable all our residents, regardless of where they live, to access them, rather than pursuing a policy which seeks to force all but the most affluent to live in urban areas.</p> <p>We welcome the suggestion that such development (where they do happen) should include significant private amenity space.</p>	
The Tortworth Estate	We support this approach and its underlying principles, however this should be in combination with sustainable growth in rural locations to enhance the vitality of rural communities. We understand sustainable rural growth to be a key focus of the current Administration and this should be reflected in the Local Plan 2020.	05 Mar 2021
Tom Cotton - Road Haulage Association	No comment.	01 Mar 2021
Top To Bottom Ltd and Hanham Community Trust	<p>See attached representations.</p> <p>Overall, the proposed approach is supported at this stage as a positive and proactive method by which to realise the urban lifestyle approach in certain communities within South Gloucestershire. The approach is supported by the NPPF which is clear that policies should make optimal use of previously developed land, and where possible look to increase density around town centres and Public Transport hubs.</p>	11 May 2021
Tristan Clark - South Gloucestershire Council	<p>When redeveloping our urban areas Priority Neighbourhood status in South Gloucestershire should feed into decisions about the provision of affordable housing. There is arguably a greater need for affordable housing within Priority Neighbourhoods due to the presence of multiple forms of social deprivation in those areas. Developers should not be able to circumvent their affordable housing obligations in Priority Neighbourhoods by advancing highly selective economic arguments that ignore the presence of multiple forms of social deprivation in these areas.</p> <p>With regards to commercial car parking South Gloucestershire Council should seek to maximise the potential of Park &amp; Ride facilities across the authority. It should also explore the potential for financing multistorey underground car parks in our urban shopping centres and high streets to address the pressure for car parking in those areas and free up above ground space for other purposes.</p> <p>In terms of residential car parking requirements officers should not assume that the provision of car parking spaces can be reduced without strong empirical evidence to justify that. It is imperative that we do not adopt a one-size-fits-all approach across all urban areas within the authority that disregards the respective availability of alternative forms of transport available to residents (whether by foot, bicycle, or public transport) in different areas. Officers must also weigh the needs of residents with limited mobility are dependent on the capacity to park near their homes. Any changes to current planning policies on parking must take care to avoid unintended consequence such as excessive demand for limited spaces (which often has a knock-on effect into surrounding roads) and heavy congestion (accompanied by</p>	01 Mar 2021

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	areas of poor air quality).	
Trystan Mabbitt - Hanson UK - Heidelberg Cement Group	No comment.	18 Mar 2021
Victoria Bailey - Oldbury on Severn Parish Council	This is not really an issue for a Rural Parish although there could be consequences e.g. 'invasion of space' for leisure etc. Really need to see more information at Phase 2 to constructively comment.	24 Mar 2021
Vistry Group	<p>Please refer to enclosed representations.</p> <p>Section 6: Urban Lifestyles:</p> <p>Do you have any comments on the Urban Lifestyle approach to investigate further growth and change in our urban areas?</p> <p>Vistry's comments on the principle of urban living as a building block are set out above under Section 5. Delivery of increased densification in the urban areas, while reasonable in principle, is complex and multi-faceted. Reliance on urban living as a significant component of the growth strategy cannot be supported until such time that evidence confirms that this approach is effective and deliverable. There are numerous factors that will influence the deliverability of the Council's suggested approaches to achieve increased density in the urban areas, which should be tested robustly through evidence, notably viability. In accordance with the NPPF, all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). For example, under Lifestyle Theme (4) if the Council is seeking to apply Nationally Described Space Standards (NDSS) to new build dwellings, then this should be in accordance with the NPPF (para 127f &amp; Footnote 46). Footnote 46 states that "policies may also make use of the NDSS where the need for an internal space standard can be justified." The PPG[5] states that "where a need for internal space standards is identified, the Authority should provide justification for requiring internal space policies. Authorities should take account of the following areas need, viability and timing."</p> <p>[5] ID: 56-020-20150327.</p> <p>Focusing on the delivery of apartments as an 'easy fix' to achieve higher densities could unduly skew the distribution and mix of housing that is available. Changing lifestyle habits and demand profiles emerging in the aftermath of the Covid-19 pandemic are also likely to mean that more people will be seeking a home with a greater degree of flexibility and adaptability (for example to be able to work from home), and with access to private outdoor space (not just balconies).</p> <p>The Consultation Document cites walking distances of between 800 metres and 1km (a 10-minute walk) as appropriate when assessing accessibility to existing shops and services, as determinants of 'Urban Lifestyles.' Recognition should, however, be given to the increasing role of cycling and in particular e-bikes and e-</p>	06 May 2021

Respondent Name	User Response: Text	Response Created
	<p>scooters. Active travel is becoming increasingly prevalent and should, therefore, be factored into the locational strategy. The availability of Public Transport links to the town centres, particularly those that are capable of being enhanced through investment, should also be a key consideration.</p>	
<p>Vistry Group - Land at Post Farm</p>	<p>SECTION 6 – URBAN LIFESTYLES:</p> <p>The ‘Urban Lifestyles’ section of the Plan explains that it sets out a proposed new approach to development in some urban areas. It is not clear how this standalone section relates to the previous Spatial Strategy section (specifically the identification of the first ‘building block’ - focusing development in existing urban areas). Clarification is sought as to whether there is a distinction between the areas identified in the Urban Lifestyles section and those referred to under the first ‘building block.’ If the Urban Lifestyles section is providing further detail for how the first building block will be realised this needs to be explicitly clear in the document, and evidence of the suitability and capacity for ‘urban lifestyles’ development should be provided, since this will likely have a significant impact on the final Spatial Strategy.</p> <p>The principle of part of the development strategy being to deliver growth in existing urban areas/settlements is generally accepted, and accords with relevant policy, guidance and good practice. However, as set out in relation to the first building block, there is likely to be insufficient capacity within urban areas to accommodate the level of growth needed in the District, and other development locations will need to be identified. The level of growth planned for as part of Urban Lifestyles must be derived from a robust evidence base, but at present, there does not appear to have been assessment of the potential capacity in existing urban areas. In addition to the concerns raised above in relation to over reliance on Brownfield sites, it is important that scheme viability is properly considered if this is a key source of delivery in the Plan. Brownfield sites can take time and cost to remediate ready for redevelopment, and there are often constraints on the type and scale of development which can be achieved, and the areas of the housing market which these products will be attractive to. It is not clear from the existing evidence base supporting both the sub-regional and local policies that viability has properly been considered and it is essential that this is fully undertaken through subsequent stages of the Plan.</p> <p>Whilst it is not completely clear how this section of the document relates to the building blocks, we do support the identification of Thornbury as a key location suitable for accommodating additional development in the new Plan period. We support the intention to ‘investigate further growth and change’ at Thornbury, as it is a key town within the existing and future settlement hierarchy for South Gloucestershire. Where relevant this can include consideration of how ‘urban lifestyles’ development may be appropriate, but if this is solely part of an approach to use existing urban sites, then there are likely to be only limited options available at Thornbury, and the main potential for additional growth (beyond areas within or near to the town centre) will be on sites adjacent to the existing urban edge.</p> <p>Vistry’s land interests at Post Farm are very well placed to provide for additional development that can integrate with the existing urban edge and has access to the facilities and services nearby at the town.</p>	<p>29 Apr 2021</p>

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Vistry Group - Land at Yew Tree Farm	<p>SECTION 6 – URBAN LIFESTYLES:</p> <p>The ‘Urban Lifestyles’ section of the Plan explains that it sets out a proposed new approach to development in some urban areas. It is not clear how this standalone section relates to the previous Spatial Strategy section (specifically the identification of the first ‘building block’ - focusing development in existing urban areas). Clarification is sought as to whether there is a distinction between the areas identified in the Urban Lifestyles section and those referred to under the first ‘building block.’ If the Urban Lifestyles section is providing further detail for how the first building block will be realised this needs to be explicitly clear in the document, and evidence of the suitability and capacity for ‘urban lifestyles’ development should be provided, since this will likely have a significant impact on the final Spatial Strategy.</p> <p>The principle of part of the development strategy being to deliver growth in existing urban areas/settlements is generally accepted, and accords with relevant policy, guidance and good practice. However, as set out in relation to the first building block, there is likely to be insufficient capacity within urban areas to accommodate the level of growth needed in the District, and other development locations will need to be identified. The level of growth planned for as part of Urban Lifestyles must be derived from a robust evidence base, but at present, there does not appear to have been assessment of the potential capacity in existing urban areas. In addition to the concerns raised above in relation to over reliance on Brownfield sites, it is important that scheme viability is properly considered if this is a key source of delivery in the Plan. Brownfield sites can take time and cost to remediate ready for redevelopment, and there are often constraints on the type and scale of development which can be achieved, and the areas of the housing market which these products will be attractive to. It is not clear from the existing evidence base supporting both the sub-regional and local policies that viability has properly been considered and it is essential that this is fully undertaken through subsequent stages of the Plan.</p> <p>Whilst it is not completely clear how this section of the document relates to the building blocks, we do support the identification of Thornbury as a key location suitable for accommodating additional development in the new Plan period. We support the intention to ‘investigate further growth and change’ at Thornbury, as it is a key town within the existing and future settlement hierarchy for South Gloucestershire. Where relevant this can include consideration of how ‘urban lifestyles’ development may be appropriate, but if this is solely part of an approach to use existing urban sites, then there are likely to be only limited options available at Thornbury, and the main potential for additional growth (beyond areas within or near to the town centre) will be on sites adjacent to the existing urban edge. Vistry’s land interests at Post Farm are very well placed to provide for additional development that can integrate with the existing urban edge and has access to the facilities and services nearby at the town.</p>	29 Apr 2021
Waddeton Park Ltd	As per the response to Q7 above, the Council’s Urban Lifestyle approach should not revert to an overly ambitious intensification of site densities.	11 Mar 2021
Waddeton Park	44. As set out above, the Urban Lifestyle approach must form part of a balanced	17 May

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Ltd - Land at Hicks Common Road	portfolio of growth options. The recent pandemic has taught us that densification in urban areas needs to be balanced with delivering recreational space, green infrastructure, and an avoidance of town cramming to support communities' health and well-being. The same high standards that are applied to greenfield development must be applied to urban/Brownfield development. With a greater proportion of people expected to spend some of their time working from home (or locally to home) in the future, this issue is even more important to plan for.	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

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