

Report on Questionnaire Answers

Questionnaire: Local Plan 2020

Question: [15: Creating Sustainable Rural Villages and Settlements] Do you h...

Respondent Name	User Response: Text	Response Created
A. Ashyon	It is very important and the council needs to keep pushing environmental building and settlements.	31 Jan 2021
Adam Gould	I really think you need to enable development in villages which have been artificially segregated due to green belt allocation and an illogical settlement boundary.	27 Feb 2021
Alan Jones - Hanham & District Greenbelt Conservation Society	<p>As stated in Response 3: Comment on Issues, we question the dichotomy of this plan pursuing an approach to build on green spaces and the Green Belt. The approach advocated here is in direct opposition to SGC's current published Strategic Policies.</p> <p>We are staggered that longstanding appreciation and protection of the advantages of the Green Belt is to be swept away to construct unsubstantiated increased housing, to satisfy political promises.</p> <p>Creation of the Villages and Settlements envisaged in these proposals will result in Communities isolated from work opportunities, healthcare and education.</p> <p>Accessing any of these vital services would necessitate individual travel, thereby adding, not reducing emissions.</p> <p>In stark contrast to the consideration being given to the Kleeneze development in Hanham (Q 13 response) is the development at Cribbs Causeway (PT14/0565/0) only recently approved by SGC Planners. This 1000 homes development on land, removed from the Green Belt (which had only a few years earlier had been designated as valuable landscape) now comprises an off the shelf, standard house type development, virtually isolated from facilities, necessitating commuting for all work opportunities. The housing layout demonstrates accommodation fronting the M5 motorway, with scant regard to pollution from noise, vehicle emissions and particulates. A prime example of how not to create sustainable developments! If this demonstrates the new world of 'beautiful' developments.....</p>	26 Feb 2021
Ali Adams - Siston Parish Council	Protecting common and the green belt surrounding it is of vital importance to Siston Parish Council. SPC fears that by prioritising brown land the price the land to increase, encouraging business to move to cheaper sites.	24 Feb 2021
Amy Gould	Unsubstantiated Settlement Boundaries restrict sustainable development on already developed land around villages. I have confirmed there is no methodology held for established settlement boundaries with a chap in the south glos planning team. Unfortunately, south glos failed to keep its previous promise to review all settlement boundaries from its previous local plan	28 Feb 2021
Andrew Humphrey	Best option is to extend current developments such as emerson green, hortham village, bradley stoke etc with an extra couple roads giving 50-100 houses in each of these.	31 Jan 2021
Andrew Shore	More focus needed on flood risk. I agree that growth needs to be controlled in our rural villages, but not stopped in	01 Mar 2021

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	totality. More appropriate for smaller and infill developments. Design is important.	
Angela Chapman	<p>The idea of creating more building on green belt in and around Thornbury is outrageous.</p> <p>I live in the Kington area of Thornbury . We have the most wonderful walks, country lanes, bridle paths . Rare breeds of wild life,. Encouraging locals and others alike to spend time enjoying the countryside. We are on the path fir the migration of many species of birds from across the world. Building in our area would destroy all that. We have badgers, including rare albino deer, foxes, herons who have been breeding, several pairs of buzzards also breeding, flocks of fieldfare, both lesser and great spotted woodpeckers, barn owl, tawny owls, little owl, and migrating geese en masse.</p> <p>In the ten year we have lived in Kington, we've noticed an increase in the wildlife, because the area is unspoilt and natural. The local farming increases the sustainable wildlife. Kington lane experiences major flooding at times which would only increase with further building to the area. The lanes are narrow and cannot cope with further heavier traffic . During lockdown, it has shown just how much people have enjoyed the country walks, and horse riding along the bridge paths . More building, wider roads , roundabouts, traffic lights, pollution, noise.... no more to say. It would ruin what has taken years to achieve. All the children would miss the opportunity to grow in a rural community enjoying all of the above.</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	I agree but you must stop building in green areas, make sure a village has enough infrastructure to sustain a new development as you seem very lacking in your responsibility to this policy of yours.	16 Feb 2021
Anne Thomson - Burbank Neighbourhood Watch	No	21 Jan 2021
Annette McLaren	Development should be limited to expansion of Tree growth and reducing flood risks - Not increase the flood risk which would be inevitable if the development of land south of Thornbury - Kington area was to proceed	28 Feb 2021
Ann Fray	New proposed developments seem to be going against your plan and priorities in Wickwar!	25 Feb 2021
Anthony Mcwhirter	Its one thing to investigate growth of our villages, but not to extend our towns right up to there borders.	26 Feb 2021
Arvin Parmar	<p>It is imperative to ensure any new builds have the appropriate road infrastructure to support the development. Do not allow any new builds that will go against this. A proposed development by Crest Homes in Wickwar, will go through Inglestone Road to get to the new development.</p> <p>The road is highly congested and an absolute hazard during start and finish times at the local primary school (Alexander Hosea). Cars are double parked which is a danger to the primary school children walking to the school as well as cars trying to</p>	13 Dec 2020

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	<p>leave the village for daily commutes.</p> <p>The above is an issue today without the development of the new build which will only compound the issue and cause a further likelihood of both car accidents and children/pedestrians getting knocked over.</p>	
Ashfield Land	<p>Please see enclosed representations.</p> <p>7.18 We agree with the proposed approach to flood risk and AONBs, however for the reasons we have set out we consider that a thorough review of the Green Belt should be undertaken, and land allocated on the edge of Hanham as part of the Local Plan.</p> <p>7.19 The JSP correctly identified that it would not be achievable to deliver all of the homes required outside of the Green Belt without significantly compromising other sustainability objectives, namely reducing the need to travel. As the number of homes required has increased even further across the WECA as part of the revised standard method, which will result in Bristol’s need overflowing into South Gloucestershire, it is now even more imperative that the Green Belt is reviewed, and land allocated where demand is greatest.</p> <p>Do you have any comments on our proposed approach to investigate an appropriate level of growth in our rural villages and settlements?</p> <p>7.20 We wholly support investigations into rural villages and settlements so that a modest level of growth can be allocated here to sustain existing facilities and services.</p>	31 Mar 2021
ATA Estates (Longwell Green) LLP and Sovereign Housing Associaton	<p>The Council is proposing to investigate appropriate levels of growth in areas where sites have been identified through previous Call for Sites, up to 200m from the edges of existing urban areas. Longwell Green is identified as one such place for investigation; though, as we have noted, it should not be regarded as a “rural village and settlement” under Building Block 4. Indeed, Longwell Green is included in the Urban Place Profiles forming part of the evidence base.</p> <p>The Council’s proposed approach to investigating an appropriate level of growth involves the consideration of key sustainability issues such as; (a) proximity to key services and facilities and; (b) access to effective Public Transport connections, having regard to its Data & Access Profiles (November 2020). No comparison of each assessed location is provided though.</p> <p>Whilst Longwell Green should not be considered as a “rural village and settlement,” it should be regarded as a highly accessible and sustainable location for greenfield urban extension. Our client controls a large parcel of land to the West of the urban area of Longwell Green (see Appendix 1). The land is not within an area of high flood risk, is relatively unconstrained by environmental designations and readily available for development.</p> <p>The site is in close proximity to the centre of Longwell Green. As confirmed within the Council’s Data & Access Profile, a number of local facilities including; (a)</p>	06 Apr 2021

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	<p>three Pharmacies; (b) two convenience stores; (c) four supermarkets; (d) a Post Office; (e) a community centre and; (f) three Public Houses are located within a short walk of the site. Bristol City Centre and Bath City Centre is a 31 – 45 minute bus ride away from Longwell Green, with Keynsham being accessible by bus within 15 minutes. The site is also within cycling distance of a number of transport hubs including Keynsham train station, and its allocation for housing would provide a real opportunity to enhance the Public Transport network within its vicinity.</p> <p>Having regard to the conclusions of previous technical analysis, summarised in our Promotional Document at Appendix 2 a high-quality sustainable development of around 500 dwellings could be provided on site. The development of the site could secure; (a) the delivery of and increased access to green infrastructure including public open space; (b) the delivery of high-quality housing and; (c) access for its residents to healthcare services, community facilities, education, retail and employment opportunities within and on the edge of Bristol; (d) new community or education facilities.</p>	
Barratt Homes (Bristol) Ltd	Please see enclosed submission.	14 Apr 2021
Barrie Hesketh	Do not allow developments without obligatory shopping and public transport facilities.	16 Feb 2021
BDW South West	<p>It is agreed that at this stage of the Local Plan process, all rural villages and settlements should be considered however it is expected that constraints will be found in a number of more rural, isolated areas in the context of lack of provision of meaningful facilities and transport links than could be considered the case in lesser rural areas.</p> <p>Historically, many of the rural communities have seen comparative lack of growth and this poses difficulties in their ability to facilitate major new growth to the detriment of existing locations. Notwithstanding the above, a degree of growth should absolutely still be focussed in rural areas in order to improve social and economic infrastructure.</p>	19 Apr 2021
Bloor Homes	<p>Creating Sustainable Rural Villages and Settlements:</p> <p>Demographics:</p> <p>5.1 We note the reference to the ageing rural population; and highlight that it will also be necessary to consider the demographic profile arising from housing the unmet needs from the City of Bristol.</p> <p>5.2 Bloor Homes support the delivery of adaptable and accessible housing – and any specific standards that are informed by evidence of need, viability and reflecting site specific factors in accordance with the PPG – 63-009-20190626.</p> <p>Scale of Development:</p> <p>5.3 We recognise that the consultation document is distinguishing between small/</p>	01 Apr 2021

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	<p>medium sized developments, and larger scale growth in rural communities; and this distinction is welcomed.</p> <p>5.4 In considering the suitability of a settlement for development – we consider it necessary to identify village clusters. For example, Coalpit Heath, Frampton Cotterell and Winterbourne; whilst different villages, they are functionally and physically linked to the extent that for the purposes of considering whether a location provides a suitable location for future growth; they should be considered together. This is supported in the NPPF – paragraph 78; and accords with the findings of the Sustainability Appraisal (paragraph 4.115).</p> <p>5.5 The range of factors identified within the consultation document as influencing the scale of growth to be directed to rural communities is broadly supported; with the exception of the reference to the existing size of the settlement (p122). The scale of growth directed to a settlement should consider its accessibility, services/ facilities (existing and potential), and its capacity to support further growth. The existing size of the settlement is not a relevant consideration in determining the future scale of growth.</p>	
Bloor Homes and Maximus Strategic Warmley Ltd	Please see enclosed submission.	29 Mar 2021
Bloor Homes South West Ltd - Land at South Farm	<p>SECTION 7 – CREATING SUSTAINABLE RURAL VILLAGES AND SETTLEMENTS:</p> <p>As is acknowledged in the consultation report, it is important to understand the overall level of growth that will need to be accommodated in the District before deciding what level of development should be accommodated at individual settlements. Wickwar is identified (ref. 57), along with most other settlements in the District on page 121 of the document, subsequent sections of this Chapter categorise which of the settlements are in areas at risk of flooding, within the Cotswold AONB, or within the Green Belt. Wickwar is not within any of these constrained areas. Bloor Homes’ land interests at Wickwar form a logical and sustainable extension to the village. Land at South Farm, is capable of accommodating circa 150 new homes as a first phase, with land for a potential new community shop available adjacent to Sodbury Road.</p> <p>Some level of discussion has already been presented in the consultation report that suggests small and medium scale growth is appropriate at rural settlements. It is too soon to decide what level of growth should be accommodated, it may be appropriate that larger scale development at settlements such as Wickwar may be the most appropriate way of accommodating the requisite growth. At this stage in the Plan, all settlements should be ‘on the table’ to be considered for growth, both inside and outside of the Green Belt.</p>	26 Mar 2021
Bloor Homes South West Ltd - Land at Wotton Road	As is acknowledged in the consultation report, it is important to understand the overall level of growth that will need to be accommodated in the District before deciding what level of development should be accommodated at individual settlements. Charfield is identified (ref. 8), along with most other settlements in the	20 Apr 2021

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	<p>District on page 121 of the document, subsequent sections of this chapter categorise which of the settlements are in areas at risk of flooding, within the Cotswold AONB, or within the Green Belt. Charfield is not within any of these constrained areas. Bloor Homes' land interests at Charfield forms a logical and sustainable extension to the village. Land to the North of Wotton Road has the ability to deliver a range of homes and contribute to a consistent supply within the area which will play a significant role in meeting the needs of the region. Development at this location can address future infrastructure needs for the area, as well as contributing to improving connections through the village.</p>	
Brian Hackland	<p>See responses under Issues 17 and 18, 23 and 24, 25 and 26, and Potential Priorities 4, 5 and 10 above.</p> <p>I understand the need for development of small sites as part of a balanced package. Indeed, many such small developments will be better integrated with rural settlements and sympathetic to local vernacular since they tend to be less formulaic in their design than larger developments and to be undertaken by developers that are local and familiar with the communities and their needs. Rural development should address local need and be planned in collaboration with local communities. Where potential small-scale development would require extinguishment of Green Belt designation it should be assessed rigorously and transparently on the basis set out in the National Planning Policy Framework.</p>	26 Feb 2021
Bristol and England Properties (BEP)	<p>5.1 The approach to areas of flood risk is considered appropriate. We have discussed this in more detail above, however, our position is that development in areas of higher flood risk is inherently less sustainable than development in areas of lower flood risk. The former should, therefore, be avoided where appropriate alternatives are available as per the guidance in the NPPF and PPG.</p> <p>5.2 With regard to AONBs, we support the exploration of a strategy to support growth in rural areas in the interests of maintaining the vitality and viability of these communities and combating affordability issues. However, we note that the need to protect valued landscapes means that development in these locations will need to be relatively small scale.</p> <p>5.3 With regard to rural communities in the Green Belt, we agree that the first stage is to establish whether the District's development needs can be met without impinging upon the Green Belt, or if there are exceptional circumstances that would justify its release.</p> <p>5.4 The guiding principles for identifying potential growth locations strongly indicates that land around the Bristol urban fringe, Yate and key transit routes (e.g. Frampton Cotterell and Coalpit Heath) have clear sustainability benefits over development in non-Green Belt locations that would justify their release.</p> <p>5.5 With regard to smaller settlements, the question is whether their development needs/requirements can be met through the exceptions set out in paragraph 145 of the NPPF (limited infilling, redevelopment of Brownfield sites, rural exceptions sites for affordable housing etc) or if this would dictate a more direct approach (e.g. formal allocations).</p>	17 May 2021

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	<p>5.6 The Phase 1 document suggests that the housing requirement, coupled with constraints at villages beyond the Green Belt, will likely mean a proportion of growth needs to be directed to settlements within the Green Belt as well. This is supported by the Sustainability Appraisal which has indicated clear sustainability benefits associated with directing growth toward villages within the Green Belt (table 4.7 of the SA). This is a welcome start; however, we note that a flaw of the JSP and a common pitfall of other Local Plans is the failure to provide a robust assessment in support of the exceptional circumstances being demonstrated (e.g. Ashfield District Council and Amber Valley Borough Council fell at the Examination in Public stage due to the poor quality of the evidence in respect of Green Belt release). We would suggest a dedicated topic paper be prepared in support of the Plan if, as we expect, Green Belt releases be required to support the development needs of the District.</p> <p>5.7 We agree that the new Local Plan will need to explore the possibility of growth at rural settlements in the Green Belt for a range of development scales to underpin housing delivery from the larger strategic sites that will also be necessary to meet the overall housing requirements.</p> <p>5.8 This will, ultimately, be dictated in part by the scale of the housing requirement and reliance that will be placed on strategic sites. A significant advantage of a dispersed approach to housing distribution is that delivery is likely to be less of an issue. However, we acknowledge that there are trade-offs with achieving wider sustainability objectives and so an appropriate balance will need to be struck.</p> <p>5.9 The obvious advantage for settlements in the Green Belt is that they tend to be better related to the Bristol Urban Fringe and market towns of Yate, Thornbury and Chipping Sodbury where services, facilities and employment opportunities are more readily accessible. There is, therefore, greater potential for development to achieve the sustainability objectives set out in the Phase 1 document through development at rural settlements.</p> <p>5.10 There are a handful of ways in which the Council could manage development at the rural villages; however, we would support the identification of allocations at settlements, either through this Plan or a subsequent site allocations plan. This is more important for the Green Belt villages given that boundaries can only be altered by Local Plans. This may be the preferred approach in the interests of ensuring delivery at these settlements can come forward earlier in the Plan period.</p> <p>5.11 Alternatively, the process of identifying site allocations could be deferred to the Neighbourhood Plan (NHP) process, at least for certain Parishes where these are being progressed. However, it will be important for the Local Plan to establish what the requirement for these areas would be and establish the exceptional circumstances necessary to justify development within the identified Parishes. A view can be taken at a later date as to whether a Site Allocations Plan would need to be progressed if insufficient progress has been made on any emerging NHPs.</p>	
Camilla Allen	Do not feel this has been considered with regards to the proposed development site outside Thornbury in the hamlet of Kington.	23 Feb 2021

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	<p>Kington would effectively lose its rural aspect and part of the Oldbury-on-Severn parish and become a suburb of Thornbury instead.</p> <p>There has already been a huge amount of housing development in Morton and around Butt Lane providing traffic disruption/inconvenience over the last few years. Further development out to Kington and Oldbury-on-Severn will extend years of noise/traffic disruption etc to these villages/hamlets.</p>	
Carol Harries	<p>Green Belt may need to be reallocated to allow some rural settlements to experience growth. The almost random allocation of the original green belt area is now out of date and needs to be revisited</p>	26 Jan 2021
Caroline Phillips	<p>National Planning Policy requires all Local Plans to demonstrate that brownfield, urban and non-Green Belt land has been explored prior to proposing changes to the Green Belt. I'm not convinced this has been or is fully reviewed as Greenfield/ Green Belt is repeatedly mentioned throughout documentation.</p> <p>Why are rural villages and settlements not currently thriving - I question this argument. In what sense are they not, on what evidence is this based? Large new developments will overwhelm a smaller setting or hamlet restricting its ability to thrive.</p> <p>Example - new development in Pucklechurch has caused anxiety and anti-social behaviour due to a lack of space, parking and poor design. Areas on Oaktree avenue have become undesirable locally.</p> <p>Shortwood and areas closely linked to the Bristol fringe are already extremely sustainable.</p> <p>To be honest, people who live in this locality would strongly argue against development!. In fact areas locally are already over burdened with development with some planning applications having been previously rejected due to lack of sustainable infrastructure i.e. for Cosham Street behind Mangotsfield Football club.</p> <p>Who benefits from growth in the above areas. Development appears to be at the detriment of those who live in these locations, how does this create a thriving community? People who have moved to these semi-rural areas, will surely leave if large scale development is planned!</p>	12 Mar 2021
Cate Davidson - Sodbury Town Council	<p>At this point the plan sets out some guiding principles and issues for consideration which are hard to argue with. The real test will be how these are applied, what takes precedence and how much of a say communities will have about development in their area.</p> <p>All development in any settlement needs to be proportionate to the existing size of the settlement and the facilities available. It should also take into account the character and history of the village or settlement, so don't put large housing estates on the fringe of a village that has no housing estates.</p> <p>Rural villages and settlements must be allowed to maintain their identities and individuality. To achieve this any development in the AONB or of Green Belt land must not allow villages to be swallowed up by larger adjacent towns. Development</p>	03 Mar 2021

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	<p>of any of this environmentally important land needs to be considered extremely carefully.</p> <p>As there has been a level of speculative development already this should be considered as part of any allocation of housing that might be made under the Local Plan. If a village has already had a level of development very recently, which is a reasonable contribution to the overall numbers required, then further development should be prohibited.</p>	
Catherine Bird	DO NOT BUILD IN OR AROUND THORNBURY!!!!!!!!!!	28 Feb 2021
Catherine Graham	It is very vague and non committal. The areas outside urban development, depending on the 5 year supply, need far more careful consideration in terms of sustainability and realistic infrastructure support. There would be very little point in building 300/400 houses in a village with limited or no facilities in terms of employment, a shop, health care, school places, bus services, foot/cycle paths to neighbouring amenities. If there is no realistic way of funding or ensuring these services can definitely be provided.	08 Feb 2021
CEG and the Charfield Landowners Consortium (CEGCLC)	Please see accompanying covering letter.	23 Apr 2021
Charlcombe Estates	<p>Support is given to the identification of a suitable level of housing growth in the rural areas.</p> <p>Those villages within the AONB and Green Belt should only be considered for limited housing growth due to these constraints.</p> <p>There are a range of rural settlements which lie outside of these obligations and not subject to any other constraints i.e. flooding.</p> <p>Charlcombe Estates control land to the South of Tanhouse Lane, Engine Common which has no such constraints and has had limited development over the last 20 years. There are a range of services in close proximity and the Council has previously granted permission for residential development on adjacent sites e.g. land to the rear of Holmelea House, Tanhouse Lane (PK18/0504/F).</p>	04 Mar 2021
Charterhouse Strategic Land (1) Ltd	25. Indeed, we would suggest that the Green Belt boundaries are subject to a process that removes (i.e. cuts out) settlements from the Green Belt which do not require that level of restriction. This would for example include Olveston. In defining a Green Belt boundary for the settlement this should include development land and safeguarded land where this is appropriate. The boundaries should be defined such that they are recognisable and permanent.	07 Apr 2021
Chris Rich - Mizmo Communications Ltd	As part of the consideration of overall growth for the District, opportunities in and around rural villages should be investigated. However, in addition to this opportunities on the fringe of Bristol should be considered, especially where they are well served by a range of transport modes. This should include consideration of	11 Mar 2021

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	sustainable locations and should be undertaken on the basis of known investment priorities, such as Junction 18A and a review of Green Belt. In this way, the most sustainable locations for development can be identified and growth planned.	
Chris Stow	I believe that all rural/semi rural settlements, villages or recognised groups of houses should be considered for an appropriate level of growth.	08 Jan 2021
Christina Biggs - Friends of Suburban Bristol Railways	Only if new housing is located near a railway station or on a light rail route, to avoid generating more road traffic.	27 Feb 2021
Claire Normoyle	See pages 112 to 136 The appropriate walking and cycling distances (page 124) should realistically specify the maximum likely distance of the majority of journeys to be undertaken on foot or cycle, taking into account the return distance. We don't see any opportunity for large scale development in the rural villages and settlements but have no objection in principle to small scale development that is appropriate to the needs of the village or settlement itself.	19 Feb 2021
Claire Smith	You video states you are looking at greenbelt to take the pressure off of greenfield sites but this goes against the NPP! Again, it seems crazy decisions are made on incorrect DAPs, i was at an online meeting with planners recently several people commented that the DAPs were incorrect. There must be access to the correct information through business rates, it would be good to know where the information for DAP's come from? Green Belt The aim of the greenbelt is to avoid urban sprawl as stated n the NPP. Only option 1 Building outside of the greenbelt should be considered. Option 1 Outside the Greenbelt Coalpit heath is given as an option but it is in fact in the greenbelt. The chart of non greenbelt correctly omits its. The planners are recommending option 2, but Coalpit Heath does have many listed buildings and a SAM - The Rm Hill Colliery. Option 2 Both inside and outside the greenbelt Building in the greenbelt should not be used to avoid urban sprawl as stated in the NPP, there are large housing estates close by which could end up with areas merging. The SAMs listed in option 2 have omitted to include the SAM in Coalpit Heath, The Ram Hill Colliery.	26 Feb 2021
Clara Goss - Redrow Homes Ltd	Pegasus support the sustainable development of rural villages including the provision of small and medium scale sites. Pegasus agree that planning for a level of growth can;	26 Apr 2021

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	<p>"Play an important role in making sure that the long term vitality, vibrancy and overall sustainability of our rural communities is maintained..."</p> <p>Pegasus also support the SGLP2020 assertion at p.120 that;</p> <p>"The potential to deliver larger-scale growth might be an option in some of our rural villages and settlements instead of, or in addition to, any proposals for small and medium-scale growth" (emphasis added).</p> <p>Paragraph 78 of the NPPF states;</p> <p>"Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services."</p> <p>The SGLP2020 does not define ranges for 'small,' 'medium' or 'large' scale growth. However, larger development opportunities at villages located in sustainable locations, in close proximity to Public Transport options, services, facilities and employment opportunities would be appropriate to consider through the preparation of the SGLP2020.</p> <p>Hambrook is identified as rural village and settlement '21' at p. 121 of the SGLP2020 with a total of 50 existing homes. The Data and Access Profile for Hambrook evidences its sustainability credentials for development purposes (outlined above at Section 3).</p> <p>Pegasus consider that with regard to 'Creating Sustainable Rural Villages and Settlements' and the 'Green Belt' that Option 2 should be pursued by the SGLP2020;</p> <p>"2. Investigate the potential for an appropriate level of small to medium-scale growth in villages and settlements both outside and inside the Green Belt."</p> <p>Pursuing only small to medium scale growth in villages and settlements outside of the Green Belt would force new development to the North of the Authority area and cause it to leap-frog the Green Belt resulting in increased travel to larger settlements for services and facilities and employment. It would also result in smaller settlements in the South being deprived of new development that may sustain their future vitality and essential services.</p> <p>The LUC Sustainability Appraisal (SA) that accompanies the consultation states at paragraph 4.114 that;</p> <p>"Locations included in Option 2 which would help achieve benefits relating to good access and Climate Change mitigation include Almondsbury, Alveston, Hambrook and Longwell Green. These locations have relatively good existing service provision and are located on key bus routes."</p> <p>Coupled with the evidence of proximity to education and employment in the Data</p>	

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	and Access Profile the case for development at Hambrook is promoted by Pegasus and it is requested that the Authority consider the village as a location for further development in the SGLP2020 Reg 19 consultation.	
Clifton Homes (SW) Ltd	Please see accompanying representations referenced: • 482 A3 CC 250221 FINAL Local Plan Reps – Land North of Haw Lane, Olveston.	24 Mar 2021
Colin Gardner - TRAPP'D	The appropriate walking and cycling distances (page 124) should realistically specify the maximum likely distance of the majority of journeys to be undertaken on foot or cycle, taking into account the return distance. We don't see any opportunity for large scale development in the rural villages and settlements but have no objection in principle to small scale development that is appropriate to the needs of the village or settlement itself.	15 Mar 2021
Crest Nicholson South West Ltd	CNSW agree that a disadvantage of the previous approach to development is that the historic pattern of incremental investment in the sustainability of rural communities that comes from growth, has been disrupted. Because of this, the benefits of well-planned growth haven't been felt in rural villages and settlements. Development can provide local market and Affordable Housing, new employment opportunities, improved infrastructure, including walking, cycling and Public Transport upgrades and it can also support local services and facilities. This suggests that development can and should be focussed in rural areas even if the location is not immediately considered 'sustainable' where there may be some dependence on private care use in the shorter term. This backs up the fact that many rural communities have seen comparatively low rates of growth, which has created problems with the availability, choice and affordability of homes, impacting on the mix and balance of communities and local services and facilities. CNSW strongly agree in promoting growth in rural settlements to explore how development can support the sustainability of rural communities by: • increasing opportunities for home ownership and renting for younger people, families and an increasingly ageing population that want to stay in, or move back to, their communities; • increasing access to education and employment opportunities in easy reach of where people live; • supporting the long-term sustainability and success of education facilities, particularly those rural Primary Schools that have seen a decline in class sizes in recent years; • supporting existing and/or enhanced key services and facilities in rural communities, like local shops, community centres, Public Houses, Broadband	15 Mar 2021

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	connectivity, local employment opportunities, and the viability of Public Transport connections to towns and urban areas.	
D. Hemmings	<p>See attached representations.</p> <p>The Council should assess each Rural Settlement as part of a detailed Sustainability Appraisal which is utilised to inform the selection of development sites around these settlements. Such a systematic approach, assessment and the identification of the most sustainable Rural Villages for development would be in accordance with the Council’s Climate Emergency Strategy. The Local Plan 2020 should allocate sites within or adjacent to rural areas that are inherently connected to existing settlements in proximity to strategic employment facilities, well served by sustainable transport infrastructure and that provide opportunities to maximise the use of both Public Transport and active travel routes. Prioritising growth in areas that benefit from such principles will help South Gloucestershire Council achieve a better balance between future employment and residential requirements, reduce the need and reliance on private transport to commute further afield whilst encouraging more active forms of transport thereby reducing Carbon emission through healthier lifestyle choices.</p> <p>In summary, it is necessary for a robust Spatial Strategy and housing delivery efficiency to deliver housing at both urban and sustainable rural locations. Rural Settlements have a key role to play in delivering a sustainable Spatial Strategy (Building Block 4: Rural Villages and settlements), they should be investigated for their potential to provide a mix of small, medium or large scale growth depending on the supporting infrastructure and wider settlement sustainability principles.</p> <p>Creating Sustainable Rural Villages and Settlements (Questions 14, 15 &16):</p> <p>Allocating development within and adjacent to sustainable Rural Villages is crucial to efficient delivery of housing across the District and ensuring that our rural communities’ sustainability and vitality are enhanced. In adopting a ‘planned growth’ approach, development can respond to each rural settlement’s identified needs and ensure that the right support is provided to communities alongside the correct scale, form, mix and design of new development. The selection of such locations for development needs to be based on a thorough understanding of a broad range of material considerations. Many of those are identified in the Council’s issues and priorities document. These include heritage assets, including Conservation Areas, Listed Buildings and sites of archaeological value, among other technical considerations. There are also landscape features like valleys, hillsides and escarpments, all of which help to create valuable, historic landscapes and distinctive places.</p> <p>A balancing exercise in understanding all of these issues, followed by an allocation of a mix of sites, is the correct approach to determining the Spatial Strategy. Knight Frank fully support the review of settlements both within and outside of the Green Belt (Appendix 1: Option 2). The SA states in Paragraph 4.126 that:</p> <p>“In preparing subsequent stages of the Local Plan, the Council should consider a Spatial Strategy that includes a combination of villages and settlements within and</p>	23 Apr 2021

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	<p>outside the Green Belt. Option 2 performs better than Option 1 in sustainability terms, given its potential to provide residents with access to a wider range of services and facilities within the existing urban area.”</p> <p>Knight Frank agree with the need to consider all settlements within or outside of the Green Belt for new development. The retention of the Green Belt means that, apart from urban intensification, the focus of development is further away from the Bristol urban area, which would be a less effective way of meeting housing and affordable housing needs. Also, there is clear evidence of Green Belt’s protection’s adverse consequences at the expense of all other objectives and priorities, including environmental protection, Climate Change, delivering a sufficient supply of homes, among others.</p> <p>The site has been tested at Appeal (ref: APP/P0119/W/20/3253685) against the current and adopted Core Strategy and the location's capacity to accommodate sustainable development, the Inspector concluded that:</p> <p>“It is acknowledged that the proposal would contribute to housing land supply and generate additional footfall that would lead to an increase in vitality within the village and rural community by supporting local shops and services, among other things. The site is also well located in respect of its proximity to local shops and services whereby future occupants could use sustainable modes of travel, such as walking and cycling, reducing reliance on the private car and the impact on Climate Change therein.”</p> <p>Therefore, Knight Frank promote this site to the new Local Plan as an opportunity to deliver sustainable ‘planned growth’ at Old Sodbury, in accordance with the Council’s initial strategy considerations. Knight Frank consider that there are significant benefits to allocating this site for development through the Local Plan process and consider it in accordance with the NPPF for the release of Green Belt land to meet the housing requirement. The site’s character offers little value to the wider landscape given the existing use and built form on site, and it is also free from any other significant technical constraints that preclude residential development.</p> <p>The NPPF is explicit in its support for rural villages at Paragraph 77, 78, 83 and 84. This includes identifying land for development to meet the community’s market housing, affordable housing, and economic needs.</p>	
Dan Erben - Thornbury Market Garden	<p>In principle, many of the points are valid and important, but more weight needs to be assigned to sustainability, flood risk and protection of natural environment both for its ecological and societal values. Much more specific and measurable approaches need to be formulated and committed to.</p> <p>I answered 'No' to question 14 mainly as I don’t see any opportunity, overall benefit or need for large scale development in the rural villages and settlements.</p>	23 Feb 2021
Daphne Dunning - Cromhall Parish	<p>There needs to be a clear understanding that the commute for work, health, leisure, school etc will remain as a necessary function in the rural north of the county.</p> <p>There will not be the money to create enough well paid jobs / careers or</p>	03 Mar 2021

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Council	<p>infrastructure to change this.</p> <p>There is already too much development in this area – especially in Charfield, so more building will only be a detriment to the area. The promises of the house builders to improve the local amenities fall away once the plans are ‘live’ and we are left with worse roads, increase bottlenecks at J14, less jobs per head and no school places for our children.</p> <p>With a future where cars are electric / more carbon efficient, why are they still being viewed as a detriment to the green way? Recycled components, low emissions etc.. and in the rural world they will still be a vital tool. Why are there plans to reduce parking etc in the places that rural commuters, shoppers, leisure seekers will need a car to visit? Surely if everything else moves towards a greener future in 20 years modes of private transport will too, and it may not decrease to the levels you believe, yet you will have locked us into the urban dream with no scope for flexibility.</p>	
Daphne Dunning - Pucklechurch Parish Council	<p>Whilst PPC agrees that a plan-led approach is required to protect rural villages and settlements from speculative and unsustainable growth it does not agree that what is presented here takes adequate account of the relationships that pre-exist between communities that live in these settlements and local community identity. Villages and settlements do not sit in isolation of each other or within the landscape surrounding them. Multiple references are made to individual villages and settlements but there appears to be no allowance made for those who live in hamlets smaller than those which have been assessed but which rely upon larger settlements for services and facilities and how these might be affected by more development or lack of it. The Data and Access Profiles that have been produced do not, for example, cross-reference existing inter-relationships between settlements and services that are provided at for example parish level and do not take account of local governance. It is noted that “any proposed growth should be ‘appropriate’ for the village or settlement it is located in. By this, we mean that it should be proportionate and sensitive to the village or settlement’s sustainability” but this does not consider other development that has or is about to take place within the same parish: our parish has three focal points of settlement, a village with a development boundary and two hamlets – one of the latter is deemed too small to be within scope of a Data and Access Profile yet it relies upon the village for facilities that may well become stretched as a result of small or moderate development to its detriment. The second of these hamlets, which is washed over by the Green Belt is at risk of being subsumed into the urban conurbation because it is in a locality where sites have been identified through previous calls for sites, up to 200m from the edges of urban areas. Treating each village or settlement as a discreet unit that might offer opportunities for development may not also acknowledge the impact of developments already being bought forward outside of development boundaries and the concomitant effect that this will have on community identity and broader landscape changes. The number of properties in Pucklechurch parish, for example, are due to increase by c. 350 dwellings at Lyde Green, yet none of these are within the village.</p> <p>Regarding Green Belt see above:</p>	08 Apr 2021

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	<p>Regarding other issues PPC agrees that the additional considerations articulated on page 134 are of paramount importance for investigation at both individual site and parish level – as referenced in our answer to Q9 previous industrial land use is not always evidenced by brownfield sites at surface level.</p> <p>National Planning Policy requires all Local Plans to demonstrate that brownfield, urban and non-Green Belt land has been explored prior to proposing changes to the Green Belt. Not convinced this has been or is fully reviewed as Greenfield is repeatedly mentioned throughout documentation.</p> <p>Why are rural villages and settlements not currently thriving - question this argument. In what sense are they not? Where is the evidence? Shortwood is a hamlet where development will only simply distract from the feature of the setting. Its location is one where proximity to Mangotsfield, Emersons Green leads it to be sustainable. To be honest, people who live in this locality would strongly argue against development!</p> <p>Who benefits from growth in the above areas if development is at the detriment of those who live in these locations? People will have moved potentially to these areas for the context, which is in itself is at risk via development.</p> <p>The plan clearly states nothing is decided on at this time with the exception that Greenbelt will most definitely be identified for development. Having already lost a lot of Greenbelt around the parish it would be disappointing to lose more of this valuable asset giving the climate emergency that has been declared by SGC.</p>	
David George	Any development has to incorporate community energy scheme	15 Feb 2021
David Grover	<p>Mental health impact on residents in villages where new developments are planned needs to be considered. Most people who live in smaller villages choose to live there because of location and low population (the core reason why they are titled villages). Many residents choose to live in these low population density areas for specific reasons. If new developments are created, they change population density, green space declines and pollution levels rise significantly (noise, emissions etc.). If a small village has no amenities, increasing population increases the need to travel to areas where these amenities can be found. This adversely affects original residents mental health.</p>	25 Feb 2021
David Hathaway	<p>Appendix 2 (Summary of Green Belt Options) incorrectly states that “Wickwar and Yate have walking and cycling access to a range of services and facilities and, or public transport connections”. Wickwar does not have walking and cycling access to range of services. Wickwar has one coffee shop and a car dealership, no other shops, and key services such as health services are not available. The village pavement network does not lead anywhere – it is not connected to any destinations outside the village itself. This means that key services and facilities cannot safely be accessed by walking or cycling as all roads out of the village are very busy and quickly become 40mph+ roads. To make matters worse, Wickwar has very poor public transport as described in the ‘Wickwar Data & Access profile’, November 2020.</p> <p>However, note that the DAP 2020 for Wickwar is incorrect as it is not possible to</p>	27 Feb 2021

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	<p>travel from Wickwar to Filton in under 1.5 hours. Therefore, this journey does not make the minimum criteria for public transport by bus. Please correct this part of the Plan, and place Wickwar in a more suitable grouping.</p> <p>As you have stated the emphasis should be on planned sustainable development (not speculative), areas that aren't completely dependent on car use, areas that have good walking, cycling, public transport links, and access to local amenities.</p> <p>Guidance should be given for what is considered to be "appropriate and proportionate to the size and scale of the existing rural development". Most people will agree with this sentiment, but without definition the phrase is worthless.</p>	
David Heape	<p>National Planning Policy requires all Local Plans to demonstrate that brownfield, urban and non-Green Belt land has been explored prior to proposing changes to the Green Belt. I'm not convinced this has been or is fully reviewed as Greenfield/Green Belt is repeatedly mentioned throughout documentation.</p> <p>Why are rural villages and settlements not currently thriving - I question this argument. In what sense are they not, on what evidence is this based?</p> <p>Large new developments will overwhelm a smaller setting or hamlet restricting its ability to thrive.</p> <p>Example - new development in Pucklechurch has caused anxiety and anti-social behaviour due to a lack of space, parking and poor design. Areas on Oaktree avenue have become undesirable locally.</p> <p>Shortwood and areas closely linked to the Bristol fringe are already extremely unsustainable. To be honest, people who live in this locality would strongly argue against development!. In fact areas locally are already over burdened with development with some planning applications having been previously rejected due to lack of sustainable infrastructure i.e. for Cosham Street behind Mangotsfield Football club.</p> <p>Who benefits from growth in the above areas. Development appears to be at the detriment of those who live in these locations, how does this create a thriving community? People who have moved to these semi-rural areas, will surely leave if large scale development is planned!</p>	12 Mar 2021
David Redgewell - South West Transport Network and Railfuture Severnside	<p>We need a clear statement on the role of service centres, growth of the rural community and the economy.</p> <p>Farming and the rural economy is important to the people of South Gloucestershire in Historical Gloucestershire.</p> <p>The rural village are Growth land for Greater Bristol.</p> <p>WECA Mayoral Combined Authority needs to develop rural policies.</p> <p>Including developing a rural Public Transport policy and improving bus and train</p>	28 Feb 2021

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	<p>services.</p> <p>The role of village shops, Garages, Post Offices, Churches, rural Schools, pub houses and Doctors and Heath centres.</p> <p>We need rural affordability and social houses and housing for key workers.</p> <p>Additional Comments sent to us by email, on Monday 1st March 2021, as per the below:</p> <p>On key Public Transport corridors we support rural growth in key villages on Between Yate bus station and Wotton Under Edge at Wickwar and Charfield which is to have new railway station and is close to the market towns of Wootton Under Edge and Chipping Sodbury.</p> <p>The other rural corridor that can take rural growth is Wotton Under Edge through Charfield with its new railway station to Failfield, Buckover and Thornbury this could be developed into a bus corridor from Cam and Dursley Town centre and Railway stations and Gloucester.</p> <p>The buses can then operate on through Alveston and Rudgeway, Almondsbury and Bristol via the Motorway M5, M4, M32 .</p> <p>Alveston needs growth in affordable housing for part buy and rent for the rural workforce.</p> <p>Rudgeway can take growth and some housing especially affordable.</p> <p>Hortham still has no shop in the village or community hall.</p> <p>But before Covid-19 had an 18 hours a day bus service to Bristol City Centre. Via Gloucester Road.</p> <p>And Thornbury to Bristol Parkway and Southmead Hospital service operated by Stagecoach West now goes on to Westbury-on-Trym, Lawrence Weston and Avonmouth.</p> <p>We wish to see rural Growth. Stagecoach West and First Group can improve bus services on rural corridor in South Gloucestershire and Gloucestershire.</p> <p>Stagecoach West has a major bus depot in Patchway and in Stroud and Gloucester.</p> <p>The other Growth corridor to take development is from the new Growth town of Yate with its Park and Ride to Through Nibley, Coalpit Heath, and Winterbourne and Frampton Cotterell.</p>	
David Reynolds	Rural villages should not have development imposed on them. Development impacts these communities far greater than development in urban areas. Large %age increases in housing change the character of a village. Places like Wickwar have had speculative development imposed on them (nearly 200 houses) increasing	28 Feb 2021

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	the size of the village by nearly 33% without any increase in facilities. These are totally inappropriate and unsustainable developments and appear to contradict everything South Gloucestershire Council are trying to achieve.	
Debbie Johnson	Rural settlements shouldn't have more than 3% new builds before addressing infrastructures.	26 Feb 2021
Derek Fletcher - Wickwar Youth Centre	Rural villages will only be sustainable if there is a increase of facilities.	18 Feb 2021
Diverse Partnerships (In Collaboration With Edward Ware Homes)	Please see submitted Local Plan 2020 Phase 1 Issues and Approaches Consultation Response Document.	05 May 2021
Donna Simmons - Emersons Green Town Council	<ul style="list-style-type: none"> • There should be no changes or development to 'green belt' land. 	01 Mar 2021
Edward Ware Homes	<p>5.12 We support the principle of seeking to ensure that development at the rural villages is Plan-led in light of the level of speculative development that has come forward at them in recent years.</p> <p>5.13 Whilst strategic levels of development will be required to sustainably meet the bulk of the Council's housing requirement, development at villages where large-scale development is not possible will still be required to support the vitality and viability of those settlements and address affordability issues.</p> <p>5.14 In terms of the approach to investigating the appropriate levels of growth that should come forward at the rural villages, the two options are appropriate starting points and will need to be subject to an appropriate Sustainability Appraisal to establish which should ultimately be pursued. The approach may then need to be refined in terms of identifying which rural settlements in the Green Belt should be prioritised based on the application of the guiding principles outlined within the consultation document.</p> <p>Are there any other planning issues you think we should consider?</p> <p>5.15 Not at this stage.</p>	05 May 2021
Ellandi LLP On Behalf of Crestbridge Corporate Trustees Ltd and Crestbridge T...	No comments.	05 May 2021
Emma Jarvis	<p>Yes. Your flood risk map diagram is incorrectly labelled.</p> <p>Some parishes are not included in your lists, every rural settlement should be</p>	28 Feb 2021

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	<p>considered, including those in green belt and AONB. Some may benefit from small scale development.</p> <p>Some villages in the Green Belt have been starved of development for many years due to planning policy to the detriment of their schools, pubs, clubs and businesses. They would benefit from sensitive expansion. Instead of debating whether 'Yes' or 'No' in green Belt it would be easier to place a cap on how much development could take place within and outside a settlement in the Belt e.g a 10% max if in Green Belt and 20% max if not in the Belt, or 15% if in Green Belt and 20% if not in the Belt etc. This at least acknowledges that the Green Belt has a limiting factor compared to other locations but does not exclude them.</p> <p>Ditto with AONB, you could have 5% AONB, 10% Green Belt, 20% other increments etc</p> <p>Don't discount places with an active train line but a closed train station. This is a potential asset for development.</p> <p>The selection / deselection of villages for expansion based on existing bus service should be given a low not high weighting. A factor but not a decision driver. Buses have wheels, they can be rerouted to outlying villages if there is demand or a requirement to do so. It is not a permanent status like say topography / heritage. Developers / management committees could make contributions to bus costs.</p>	
Estrans Ltd	<p>Estrans support the delivery of some additional development in rural areas as part of a Plan led strategy, recognising that it can deliver benefits to local communities through housing, including affordable housing deliver, improvements to infrastructure and opportunities for economic activity.</p> <p>Estrans support the issues identified on page 115 that, in considering rural growth and promoting development which reduces Climate Change, it includes:</p> <ul style="list-style-type: none"> ? Focusing rural growth in locations that aren't completely dependent on the private car to access key services and facilities; ? Maximising opportunities in locations that have good walking, cycling or Public Transport links; ? Exploring opportunities that contribute to achieving key priorities around nature recovery and green infrastructure networks; and ? Providing for Biodiversity offsetting and renewable energy. 	04 May 2021
F. Francis	<p>See attached representations.</p> <p>Creating Sustainable Rural Villages and Settlements (Questions 14, 15 &16):</p> <p>Allocating development within and adjacent to rural sustainable villages is crucial to efficient delivery of housing across the District and to ensuring that the sustainability and vitality of our rural communities are enhanced. In adopting a</p>	26 Apr 2021

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	<p>‘planned growth’ approach, development can respond each rural settlement’s identified needs and ensure that the right support is provided to communities alongside the correct scale, form, mix and design of new development. The selection of such locations for development needs to be based on a thorough understanding of a broad range of material considerations. Many of those are identified in the Council’s issues and priorities document. These include heritage assets, including Conservation Areas, Listed Buildings and sites of archaeological value. There are also landscape features like valleys, hillsides and escarpments, all of which help to create valuable, historic landscapes and distinctive places.</p> <p>A balancing exercise in understanding all of these issues, followed by an allocation of a mix of sites is the correct approach to determining the Spatial Strategy. Knight Frank fully support the review of settlements both within and outside of the Green Belt (Appendix 1: Option 2). The SA states in Paragraph 4.126 that:</p> <p>“In preparing subsequent stages of the Local Plan, the Council should consider a Spatial Strategy that includes a combination of villages and settlements within and outside the Green Belt. Option 2 performs better than Option 1 in sustainability terms, given its potential to provide residents with access to a wider range of services and facilities within the existing urban area.”</p> <p>Winterbourne is a sustainable settlement with access to a good range of services and facilities within walking and cycling distance. The Village is also on main arterial Public Transport routes into the urban centre and fringes of Bristol providing opportunities for mass transit and reducing the use of private vehicles. As previously identified, the Council’s SA recognises the role that sustainable rural settlements can play in contributing towards Climate Change mitigation. Given the site is previously developed land and the level surrounding residential development, the site’s development would not impact any heritage or landscape designations across the wider settlement.</p> <p>The NPPF is explicit in its support for making ‘as much use as possible of previously-developed or Brownfield land’ (Paragraph 117) and support for rural villages at Paragraph 77, 78, 83 and 84. This includes identifying land for development to meet the community’s market housing, affordable housing, and economic needs.</p>	
Gareth Fielding	Don't permit building in rural areas	28 Feb 2021
Hannah Saunders - Dodington Parish Council	<p>Pages 113 to 136 – Creating sustainable rural villages and settlements:</p> <ul style="list-style-type: none"> • Members note that our ‘rural area’ South Ward of Dodington isn’t included.... hamlets (Codrington, Dodington and Wapley). It should be noted that we have had instances where Planning has not been allowed (or has been questioned) because the hamlets lie in Green Belt. The plans haven’t been untoward or affected others.... and have meant that parents can stay on site (annexes, etc).... whilst appreciate the Green Belt needs to be protected – sense needs to prevail in some instances. 	25 May 2021

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	<ul style="list-style-type: none"> • Members would mention again – connectivity of Rural areas to transport hubs and towns. These areas used to benefit from mobile Libraries, etc but this service has been stopped and Covid–19 has highlighted how isolated some residents feel. Some rural villages don’t have a bus service at all – and have to rely on volunteers, family members or private transport/taxis. • When people want to downsize in rural areas this isn’t always possible.... they have a large family home – but need something smaller. They don’t want to move out of village.... this sort of development needs to be considered on an ad hoc basis. • On a similar note – if children want to move out of home – but stay in village – often they can’t afford to – because of lack/cost of housing and job opportunities.... and no connectivity. 	
Hannick Homes	<p>Support is given to the identification of a suitable level of housing growth in the rural areas.</p> <p>Those villages within the AONB and Green Belt should only be considered for limited housing growth due to these constraints.</p> <p>There are a range of rural settlements which lie outside of these obligations and not subject to any other constraints i.e. flooding.</p> <p>Settlements such as Wickwar are not in such categories and have a range of services which need to be supported with additional residential development.</p>	25 Mar 2021
Hazel Jones - Hawkesbury Parish Council	<p>Before considering further growth in rural villages and settlements take into consideration any approved development that remains outstanding (either not commenced or completed) before considering further approval</p>	01 Mar 2021
Heather Elgar - Woodland Trust	<p>As above, with regards to the Green Belt: The Green Belt is not designated because of any inherent landscape or ecological quality, although it does serve an important purpose - and has been historically successful - in keeping land open and undeveloped. We urge that nature recovery and climate action is the priority where there is a conflict. We urge South Gloucestershire to also consider how it can promote nature recovery and climate action in the Green Belt.</p>	12 Feb 2021
Helen Johnstone - Stroud District Council	<p>Other planning considerations and issues</p> <p>The key considerations to help determine appropriate levels of growth in rural villages and settlements should make specific reference to the Severn Estuary SPA, SAC and Ramsar site within the text and diagrams and should include consideration of the cumulative impact from new development and associated recreational pressure.</p> <p>SDC support Option 2 for consideration of the distribution of small and medium scale growth within or around rural settlements that are within or outside of the Green Belt.</p>	26 Feb 2021
Housley	<p>Agree that the areas to be considered are appropriate, however, the plan does</p>	19 Feb

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	present any actual activity or strategies to ensure that the proposed approach is implemented or provided with an appropriate weighting for planning purposes.	2021
Ian Leslie	<p>I have covered all these above. I am aware that proposals have been put forward to have further development in the western proximity of Easter Compton. This is, as is pointed out, Flood Plain and I have many photographs of this area under water. More concrete means more water run-off, less ground and no trees to soak up that water. The loss of trees allows erosion. Further development increases traffic on the B4055 with subsequent noise and air pollution as well as making life intolerable for the villagers. The B4055 can not take any more traffic either going through the village or trying to access J17 of the M5.</p> <p>I could not agree with any policy that aims to destroy any green belt. There is so little left.</p> <p>Concreting over vast area of land and chopping down hundreds of trees on Severnside will only compound the flood plain problems.</p>	28 Feb 2021
IM Land	<p>59. As examined above, IM supports the exploration of growth at villages, but a one size-fits-all approach is not appropriate for South Gloucestershire. Some villages like Pucklechurch which are close to Bristol and its extensive available employment provides a greater opportunity to respond to the Climate Change Emergency through increased, sustainable growth. Other outlying villages such as Charfield and Falfield simply increase commuter distances travelled to the Greater Bristol Conurbation and thus the impact on Climate Change.</p> <p>60. Whilst IM supports the re-opening of Charfield Station which provides an opportunity for local modal shift, the DataShine information suggests that many people who commute into Bristol City do not work near one of the Railway Stations. This brings into question the convenience and usability of the travel mode if commuters have the inconvenience of multi-modal trips which then become time consuming. IM would like to see the evidence base for the emerging Plan to be more comprehensive in its assessment of journeys and specifically their convenience when related to the range of destinations within Greater Bristol (see Appendix 3). This should then be qualified in Carbon tonnes per settlement per year.</p> <p>61. Whilst we support the general principle of the Urban Lifestyle potential of the North and East Fringe, it has its limitations in terms of land availability. We therefore expect to see a Plan which genuinely seeks to address Climate Change, and which will focus on meeting local housing growth at settlements that have the capacity for increased growth at the most sustainable villages around the Bristol Fringe.</p> <p>62. In term of settlement hierarchy, it is also noted that the Plan focuses its sustainability audit on the Data Access Profiles prepared by SGC. A separate response is made by IM Land in that regard. Whilst IM Land supports the DAPs as a useful policy making tool, it is concerned that some of the facts are not accurately presented and it pays little attention to Climate Change factors. An example of this is the way travel is measured as a time factor rather than as Carbon emissions. Another example is, it also does not recognise that different settlements encourage different types of travel patterns depending on convenience and distance. Our</p>	11 May 2021

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	<p>concerns regarding the DAP for Pucklechurch include:</p> <p>? Accessibility to services and facilities needs to account for both car and cycle access and quality of routes for the latter rather than simply distance. There is no reference to the emergence of e-cycling either.</p> <p>? The bus route information is based on travel time for existing routes, which as we know, regularly evolve and change. Minor changes to existing routes would materially improve travel time due to the proximity of Pucklechurch to Greater Bristol.</p> <p>? The Secondary School data is incorrect, there are five within 3 miles, plus a new School recently announced at Lyde Green.</p> <p>? The Primary School data is also incorrect, there are two within the 2-mile catchment.</p> <p>? The major employment data is also unreasonably presented when multiple major employers are located on the very edge of the 2km isochrone., including the Bristol & Bath Science Park, the largest employment growth area is South Gloucestershire. Were the isochrone centred on our client's land at Pucklechurch West where the development opportunity exists, then it would present a very different, much more favourable position.</p> <p>63. In conclusion, places like Pucklechurch, which are highly sustainable should be considered more favourably for growth especially where this is able to make a more meaningful response to Climate Change than other locations. As such, the emerging Plan should not limit itself to only small and medium-scale growth, but rather larger scale growth at the most sustainable settlements around the Bristol Fringe, such as Pucklechurch.</p>	
IM Land Limited	<p>Please see enclosed submission.</p> <p>7.0 CREATING SUSTAINABLE RURAL VILLAGES AND SETTLEMENTS:</p> <p>QUESTIONS 14, 15 & 16:</p> <p>7.1 We support the Council in considering the potential for all scales of development in rural villages and settlements. In considering an 'appropriate' level of growth, the Council set out the key considerations as being:</p> <ol style="list-style-type: none"> 1. the size of existing village and settlements – relating to populations and the number of existing homes; and 2. The level of planned and speculative growth that has been built or approved in individual communities in recent years, if applicable. <p>7.2 Despite its clear sustainability credentials, only 30 homes have been completed at Pucklechurch between 2011 and 2021 (based on residential land survey data). At an average household size of 2.4 persons per household (as set out in the 2011</p>	26 Mar 2021

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	<p>Census) this equates to a growth in the population of 48 people (representing a 1.6% growth in the population of Pucklechurch). This compares with the 2011-based projections at a County level identifying an 11.3% increase over the same period. The actual level of growth at Pucklechurch has therefore not been proportionate with wider population projections and is not considered sufficient to support a strong and vibrant community. In order to comply with Paragraph 8(b) of the NPPF a sufficient level of growth should be provided to Pucklechurch.</p>	
Ivywell Capital (IC)	<ul style="list-style-type: none"> • Development at rural villages is also essential to maintain their vitality and viability. New housing can provide opportunities for elderly residents to downsize, younger people to get on the housing ladder, or young families to move in to ensure a diverse population is maintained which can support existing services and facilities (e.g. young families can support the need for existing Primary Schools). • New development at rural villages can also deliver affordable housing which is important, especially in rural areas where house prices are relatively high and small starter homes are in short supply. • The Green Belt constraint around certain villages has exacerbated this issue significantly as speculative development has been prevented even where the housing land supply position has been deficient. • There are significant benefits associated with facilitating modest development at rural villages and welcome the Council's indication that this will be explored by the Local Plan. <p>5.1 The approach to areas of flood risk is considered appropriate. We have discussed this in more detail above, however, our position is that development in areas of higher flood risk is inherently less sustainable than development in areas of lower flood risk. The former should, therefore, be avoided where appropriate alternatives are available as per the guidance in the NPPF and PPG.</p> <p>5.2 With regard to AONBs, we support the exploration of a strategy to support growth in rural areas in the interests of maintaining the vitality and viability of these communities and combating affordability issues. However, we note that the need to protect valued landscapes means that development in these locations will need to be relatively small scale.</p> <p>5.3 With regard to rural communities in the Green Belt, we agree that the first stage is to establish whether the District's development needs can be met without impinging upon the Green Belt, or if there are exceptional circumstances that would justify its release.</p> <p>5.4 Once this is established, the question is whether their development needs/ requirements can be met through the exceptions set out in paragraph 145 of the NPPF (limited infilling, redevelopment of Brownfield sites, rural exceptions sites for affordable housing etc) or if this would dictate a more direct approach (e.g. formal allocations).</p> <p>5.5 The Phase 1 document suggests that the housing requirement, coupled with</p>	17 May 2021

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	<p>constraints at villages beyond the Green Belt, will likely mean a proportion of growth needs to be directed to settlements within the Green Belt as well. This is supported by the Sustainability Appraisal which has indicated clear sustainability benefits associated with directing growth toward villages within the Green Belt (table 4.7 of the SA). This is a welcome start; however, we note that a flaw of the JSP and a common pitfall of other Local Plans is the failure to provide a robust assessment in support of the exceptional circumstances being demonstrated (e.g. Ashfield District Council and Amber Valley Borough Council fell at the Examination in Public stage due to the poor quality of the evidence in respect of Green Belt release). We would suggest a dedicated topic paper be prepared in support of the Plan if, as we expect, Green Belt releases be required to support the development needs of the District.</p> <p>5.6 We agree that the new Local Plan will need to explore the possibility of growth at rural settlements in the Green Belt for a range of development scales to underpin housing delivery from the larger strategic sites that will also be necessary to meet the overall housing requirements.</p> <p>5.7 This will, ultimately, be dictated in part by the scale of the housing requirement and reliance that will be placed on strategic sites. A significant advantage of a dispersed approach to housing distribution is that delivery is likely to be less of an issue. However, we acknowledge that there are trade-offs with achieving wider sustainability objectives and so an appropriate balance will need to be struck.</p> <p>5.8 The obvious advantage for settlements in the Green Belt is that they tend to be better related to the Bristol Urban Fringe and market towns of Yate, Thornbury and Chipping Sodbury where services, facilities and employment opportunities are more readily accessible. There is, therefore, greater potential for development to achieve the sustainability objectives set out in the Phase 1 document through development at rural settlements.</p> <p>5.9 There are a handful of ways in which the Council could manage development at the rural villages; however, we would support the identification of allocations at settlements, either through this Plan or a subsequent site allocations plan. This is more important for the Green Belt villages given that boundaries can only be altered by Local Plans. This may be the preferred approach in the interests of ensuring delivery at these settlements can come forward earlier in the Plan period.</p> <p>5.10 Alternatively, the process of identifying site allocations could be deferred to the Neighbourhood Plan (NHP) process, at least for certain Parishes where these are being progressed. However, it will be important for the Local Plan to establish what the requirement for these areas would be and establish the exceptional circumstances necessary to justify development within the identified Parishes. A view can be taken at a later date as to whether a Site Allocations Plan would need to be progressed if insufficient progress has been made on any emerging NHPs.</p> <p>Do you have any comments on our proposed approach to investigate an appropriate level of growth in our rural villages and settlements?</p>	

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	<p>5.11 We support the principle of seeking to ensure that development at the rural villages is Plan-led in light of the level of speculative development that has come forward at them in recent years.</p> <p>5.12 Whilst strategic levels of development will be required to sustainably meet the bulk of the Council's housing requirement, development at villages where large-scale development is not possible will still be required to support the vitality and viability of those settlements and address affordability issues.</p> <p>5.13 In terms of the approach to investigating the appropriate levels of growth that should come forward at the rural villages, the two options are appropriate starting points and will need to be subject to an appropriate Sustainability Appraisal to establish which should ultimately be pursued. The approach may then need to be refined in terms of identifying which rural settlements in the Green Belt should be prioritised based on the application of the guiding principles outlined within the consultation document.</p> <p>5.14 Indeed, we would note that the Phase 1 document is already suggesting that non-strategic growth at Green Belt settlements would have sustainability benefits over purely pursuing growth at non-Green Belt locations. This, coupled with the overall housing requirement will likely constitute the exceptional circumstances required to justify the release of Green Belt land for development. As such, we consider that Option 2 will need to be pursued and is supported on this basis.</p>	
James Carpenter - Falfield Parish Council	<p>Yes.</p> <p>Thornbury is listed in both the Urban Lifestyles and Rural villages and Settlements lists – this is contradictory, it cannot be considered as being both.</p> <p>Appendix 1 Option 2 is preferred where all villages and settlements should be considered for sharing the housing load, including those inside and outside Green Belt and AONB. Some, who usually suffer from planning restrictions, may welcome and benefit from small scale development to repopulate their village Schools etc.</p> <p>Agree to smaller scale rural village developments, but these developments need sustainable transport to shops, health care facilities, play areas, Libraries, all the things town folk take for granted. These should be mixed age group developments and not too far from existing families in nearby villages of developments.</p> <p>Falfield has already been allocated more than its fair share of housing with our village currently being disproportionately doubled in size. Every rural community should be considered, so it is concerning that some Parishes have been left out of your place name lists entirely e.g. Tortworth Parish.</p> <p>The flood risk map diagram is incorrectly labelled. Rockhampton is labelled as Aust etc.</p> <p>Don't discount places with an active train line but a closed train station within walking distance. This is a potential asset for development and Public Transport in</p>	14 Apr 2021

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	<p>the future.</p> <p>Selection of developable villages based on existing bus service should be given a low not high weighting. It is a factor based on current circumstance but not a main decision driver as it is a variable. Buses have wheels, they can be rerouted to outlying villages if there is demand or a requirement to do so. It is not a permanent status like say topography/heritage. Developers/management committees could make contributions to bus costs to help them be viable.</p>	
James Durant - Cotswold Homes	<p>Cotswold Homes are fully supportive of the approach to create sustainable rural villages and settlements. As set out previously, the lack of identified growth at these locations in previous Plans has led to an acute affordability issue and damage to the viability of both local facilities as well as transport links. Due to this, a number of services and facilities such as convenience stores have closed due to the lack of an engaged local population to ensure their viability. The Council are right to now look at ways that delivery of development at these locations can help to actually improve their sustainability. As set out in the response to previous questions however, it is imperative that SME housebuilders who are likely to deliver such schemes are fully supported through being given the certainty that the principle of development is accepted through allocations. At the very least the Council should be seeking to proportion numbers to the rural villages and settlements on the basis of a considered sustainability hierarchy which can now easily be garnered from the thorough work done in the form of the Data and Access Profiles for each settlement. Cotswold Homes have a number of land interests at the smaller settlements which we have promoted through your Call for Sites and which are also considered more fully in our covering letter. These sites have the ability to meet local need in a sustainable way. Cotswold Homes also have a track record of delivering high quality design in a timely manner which will be crucial to the Council in keeping both high quality design at the heart of the Plan whilst also delivering the number of homes required at the pace anticipated. Whilst we understand and to a degree support the principle of considering small scale Green Belt release at the smaller settlements which are surrounded by Green Belt, the case for exceptional circumstances is likely to be very difficult to defend at Examination without a very robust strategy and evidence base. We would therefore advocate that the Council seeks to explore the opportunity to locate as much growth as possible within sustainable limits at the smaller settlements outside of the Green Belt before turning to consider Green Belt release at the smaller villages.</p>	19 Apr 2021
John Acton	<p>It is right that you should do this, taking fully into account the amount of new infrastructure that might be needed to support the development at any village. Some of the initial comments in the consultation document are not accurate. An example is Falfield, which lies on the A38 and has the best access to the M5 of any village in the locality. In prioritising Public Transport, you should not overlook the change to electric and Hydrogen vehicles and that Public Transport will not cope with the dispersed pattern of travel for work and recreation.</p>	26 Mar 2021
John Calver	<p>Many villages need some limited growth whether in the Greenbelt or not . However to avoid "swamping I would restrict growth to 20% of existing housing stock</p>	04 Feb 2021
John Mills - Cotswolds	<p>Overall, the Cotswolds Conservation Board agrees with the proposed approach. Specific comments and recommendations are provided below.</p>	16 Mar 2021

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Conservation Board	<p>Over-arching principles for development in the Cotswolds National Landscape and its setting</p> <p>In response to Question 7 (specifically, ‘building blocks’ 3 and 4), above, we set out some key principles relating to development in the Cotswolds National Landscape and its setting. The additional comments that we provide in response to Question 15 are supplementary to - and should be considered in the context of - those key principles.</p> <p>Climate Change Mitigation and Adaptation / Sustainable Travel</p> <p>The Cotswolds Conservation Board agrees with the first three principles / bullet points set out on page 115 of the consultation document, with regards to reducing the impacts of climate change:</p> <ul style="list-style-type: none"> • focusing rural growth in locations that aren’t completely dependent on private car use to access key services and facilities; • maximising opportunities for development in locations that have good walking, cycling or public transport and digital connections to access key services and facilities; • exploring opportunities that contribute to achieving key plan priorities around the creation of nature recovery and green infrastructure networks. <p>Similarly, we acknowledge the issues relating to sustainable travel for access to services and facilities, as outlined on pages 123 and 124 of the consultation document.</p> <p>However, with regards to the last bullet point on page 115 (biodiversity offsetting and renewable energy generation we would like to make the following points):</p> <ul style="list-style-type: none"> • Biodiversity offsetting: The phrase ‘offsetting’ does not convey the extent to which development should contribute to halting and reversing declines in biodiversity. Nor does it convey the ‘net-gain’ requirements that will soon be enshrined in legislation. The priority should be to conserve and enhance (and void harm to) the existing biodiversity resource, particularly with regards to international and national nature conservation designations. Where development is permitted, there should be a requirement to deliver a significant net-gain in biodiversity. • Renewable energy: In principle, we support the provision of renewable energy generation as a key mechanism for mitigating the impacts of climate change. However, within the Cotswolds National Landscape and its setting, such provision should, in principle, be of a type and scale that is compatible with the statutory purpose of conserving and enhancing the natural beauty of the National Landscape. <p>Affordable housing and local amenities and services</p>	

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	<p>We are pleased to see the reference to affordable housing (on page 116) and to supporting / enhancing key services and facilities in rural communities (on page 117). Policy CE12 of the Cotswolds AONB Management Plan identifies these as priorities for development in the Cotswolds National Landscape.</p> <p>The provision of housing that is affordable in perpetuity (for example, social rented housing) is particularly important within the Cotswolds National Landscape. This is because other forms of so-called affordable housing are likely to be beyond the means of many of those who have a local connection and are most in need of genuinely affordable housing.</p> <p>When assessing housing provision for settlements in the Cotswolds National Landscape, a key consideration should be the affordable housing need (i.e. quantity and type) identified in rural Housing Needs Surveys (HNS) for the specific settlement / parish.</p> <p>For settlements within the Cotswolds National Landscape where there is not an up-to-date HNS (i.e. within the last five years) we urge South Gloucestershire Council to schedule these in during preparation of the local plan. This is particularly important for those settlements that are higher up the settlement hierarchy (and therefore more likely to be a focal point for plan-led development) and / or where it is known that there is developer interest. This would include settlements such as Marshfield, Tormarton, Acton Turville and Hawkesbury Upton.</p> <p>Affordable housing needs identified in an up-to-date Neighbourhood Development Plan should also be a key consideration.</p> <p>We recommend that South Gloucestershire Council should make use of the provision that allows them to demand on-site affordable housing contributions on all sites, including development of five homes or fewer, in protected landscapes. This reflects one of the recommendations of the Government-commissioned Landscapes Review Final Report.</p> <p>We also recommend that South Gloucestershire Council should seek 50% affordable housing on market-led housing developments in the Cotswolds National Landscape, in line with best practice in protected landscapes.</p> <p>Plan-led v speculative development</p> <p>The Board supports the principle of a ‘plan-led’ approach. This approach should help to reduce the risk of potentially inappropriate / harmful, speculative development proposals.</p> <p>Rural exception sites / housing development beyond the settlement boundary</p> <p>We recommend that, in the Cotswolds National Landscape at least, the rural exception sites (RES) policy should require 100% affordable housing as the starting point, with 75% being the absolute minimum (where viability assessments show that 100% affordable housing is not viable). Such sites should also be ‘small’, as</p>	

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	<p>specified in the NPPF. These requirements will help to ensure that RES sites deliver what they are supposed to in a way that is compatible with the AONB designation and with national and local AONB policy. This reflects best practice in protected landscapes.</p> <p>Any other development outside of settlement boundaries, within the Cotswolds National Landscape, should be based on robust evidence of local need arising within the National Landscape (as per Policy CE12 of the Cotswolds AONB Management Plan 2018-2023). As outlined above, a key consideration should be the affordable housing need identified for the specific settlement / parish in an up-to-date rural Housing Needs Survey (HNS). Any such development should, ideally, be contiguous with the existing settlement.</p> <p>Proportionate and ‘appropriate’ growth</p> <p>We support the principle of planned growth being proportionate to the size and scale of the existing rural communities, particularly in the Cotswolds National Landscape. Ensuring that new development is proportionate is one of the recommendations of the Cotswolds AONB Landscape Strategy and Guidelines for each landscape character type.</p> <p>Paragraph 71 and footnote 33 of the NPPF provide a useful definition of ‘proportionate’ in the context of housing developments. For example, paragraph 71 states that ‘entry-level exception sites’ should be proportionate in size to the existing settlements and footnote 33 clarifies that proportionate means that the site should not exceed 5% of the size of the existing settlement. The Board recognises that entry-level exception sites should not be permitted in AONBs. However, we consider that, in principle, this definition of ‘proportionate’ is an appropriate one to use for housing developments in the Cotswolds National Landscape.</p> <p>Development in the Cotswolds National Landscape and its setting should be sensitively located and designed. This should including being consistent with the Cotswolds AONB Landscape Strategy and Guidelines.</p> <p>Large scale growth in rural communities</p> <p>Please refer to our comments on ‘Building Block 5’ in response to Question 7.</p> <p>Access to superfast broadband</p> <p>We recognise the important role that access to superfast broadband increasingly plays in meeting people’s needs and the opportunity that it provides for working at home and holding meetings remotely, thereby reducing the need to travel.</p> <p>Within the Cotswolds National Landscape and its setting, the provision of broadband infrastructure should be located and designed in such a way that any adverse impacts on the natural beauty of the National Landscape are minimised.</p> <p>Cotswolds Area of Outstanding Natural Beauty / National Landscape</p>	

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	<p>We are pleased to see that the Cotswolds AONB (or Cotswolds National Landscape, as it is now branded) is identified as a key planning designation and consideration.</p> <p>We acknowledge all of the issues raised in the consultation document (pages 129-130) relating to the Cotswolds National Landscape. Our position on these issues is covered elsewhere in this consultation response (including in response to Question 15).</p> <p>Other key designations and considerations</p> <p>Green Belt</p> <p>The Board does not have a position on ‘Green Belt’, per se, although we acknowledge the role that Green Belt plays in, for example, safeguarding the countryside from encroachment and in preserving the setting and special character of historic towns.</p> <p>The NPPF (paragraph 126) clarifies that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. It is important to note that ‘exceptional circumstances’ also apply to major development in the Cotswolds National Landscape. Therefore, the Cotswolds National Landscape (outside the Green Belt) should not necessarily be considered to be a more suitable location for such development than the Green Belt.</p> <p>As such, we do not consider it to be appropriate to only investigate the potential for an appropriate level of small to medium-scale growth in villages and settlements outside the Green Belt (i.e. Green Belt Option 1). In this scenario eight out of the 23 available settlements (35%) would be in the Cotswolds National Landscape. In contrast, in Option 2, 13 out of 59 available settlements would be in the Cotswolds National Landscape (i.e. only 22%). As such, Option 1 would also put disproportionate pressure on a small number of settlements in the National Landscape.</p> <p>Therefore, our preferred Green Belt option would be Option 2.</p> <p>A number of settlements are located in both the Cotswolds National Landscape and in the Green Belt. The level of protection afforded to both of these designations means that development in these settlements will require a particularly high level of scrutiny.</p>	
Jo Marsh	The report says the plan might have to reconsider green belt land, however, this should be an absolute last resort. Green belt land is precious and should be protected.	11 Feb 2021
Jonathan Edwardes - Pilning and Severn Beach	Q14 - You highlight the Cotswold AONB but have no special category for the Severn Estuary and Levels. Whilst there is obviously less opportunity for residential provision on The Levels, the landscape character is no less important. The landscape is the context of the bridges, and is the driver of tourism, a magnet to	26 Feb 2021

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Parish Council	<p>walkers and birdwatchers, who all add to the transport problems of the area.</p> <p>Green Belt review: we have submitted proposals for our settlement boundaries in the Call for Sites. One proposal is an extension into Green Belt on the north of Pilning. We see this in counterpoint to our long-standing wish to see the Green Belt extended to the south of Pilning and Severn Beach. i.e., the inner edge of the Green belt should be moved southwards to meet the edge of Western Approach distribution park, the edge of ASEA. Both villages should be washed over to provide the protection needed from aggressive development, which would also be a useful policy in resisting growth in a flood risk area.</p> <p>We question the relevance of a settlement boundary around Redwick (i.e., the part of Redwick west of A403) there are now no services of any sort there. All residents must go to Severn Beach or Pilning for their nearest shop. The proximity to M4 detracts from its suitability for development.</p> <p>Q15 - The figures you quote for the number of homes is correct for Pilning and Redwick but incorrect for Severn Beach where we put the figure at around 955. Also, this record of numbers of homes only relates to those within the settlement boundaries, whereas the neighbouring hamlets and outlying homes ought still to be counted as these also contribute to the demand on rural services and public transport.</p>	
Kate Kelliher	<p>Rural villages need to grow a bit. Encourage older people to remain in the village with suitable housing. A few houses for young families to maintain a local school and shop.</p> <p>Maybe larger houses could be subdivided to provide space for families</p>	31 Jan 2021
Kate Kelliher - Friends of Ram Hill Colliery	We value our green belt location.	06 Feb 2021
Kate Maskell	Growth such as in Oldbury on Severn should involve development of services eg public transport/ village hall/ school etc nor just additional housing	22 Feb 2021
Katherine Buff	<p>See pages 112 to 136</p> <p>The appropriate walking and cycling distances (page 124) should realistically specify the maximum likely distance of the majority of journeys to be undertaken on foot or cycle, taking into account the return distance.</p> <p>I don't see any opportunity for large scale development in the rural villages and settlements but have no objection in principle to small scale development that is appropriate to the needs of the village or settlement itself.</p>	26 Feb 2021
Katy Wiseman - National Trust	The National Trust are the owners and custodians of Dyrham Park a 17th-century Grade I listed house set within a Grade II* Park and Garden at the edge of Dyrham village. As a significant heritage asset the property and its setting should be afforded the highest level of protection and the Trust would object to any development that would have clearly detrimental impacts (e.g. noise or visual) on the setting and significance of Dyrham Park.	05 Mar 2021

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	<p>The Issues and Options consultation discusses where the Local Plan should investigate the locations for growth in the rural areas and identifies in and around all villages and settlements with a defined settlement boundary, or, recognised collection of dwellings.</p> <p>The rural villages and settlements are identified on page 121 and includes Dyrham which has 26 existing homes a number of which are listed. The Issues and Options consultation defines small and medium scale growth as providing five homes or more which needs to be appropriate to the village or settlement, in terms of proportion and sensitive to the village or settlement sustainability, and potential impacts on its character and function. With the need to protect the historical significance of Dyrham Park, we question whether Dyrham is a sustainable location for new additional housing development as this may have significant detrimental impacts on Dyrham Park and its setting. With only 26 existing houses Dyrham is one of the smallest settlements identified, and with an addition (of a minimum) of five homes this could be disproportionate relative to its existing size. Dyrham is also one of a small number of settlements that is located within the Green Belt and also the Cotswolds AONB an area of national significance for landscape quality and beauty and given the highest level of protection within the NPPF. Given that development of this scale is likely to significantly change the character of this small historic settlement the National Trust recommends that Dyrham is excluded from investigations for planned housing growth.</p>	
Kevin Masters	I have read Trapp'd's response and wish to add my name to it.	25 Feb 2021
Kingdon	See comments on 3.	25 Feb 2021
Laurence Parsons	I agree with many of the issues highlighted, but again, there is no mention of the needs of the current residents, only ever the geography of the land itself.	17 Dec 2020
Lauren Cook - Stride Treglown	No comment on this matter	01 Mar 2021
Lee Preece	<p>Ambiguity surrounding central government policy about exceptional circumstances for development in the green belt and or the Cotswolds AONB. (Rural workers, Agricultural or Forestry Workers new or expanded dwellings and permitted development for rural aspects like agriculture)</p> <p>Following Brexit and an obvious renewed need for 'grow our own (locally) and to support local rural businesses, does the local plan look to encourage local people into long term careers in rural enterprises in our county? Which are often totally unaffordable for these lines of work (example- farmers , farm hands, or foresters)</p> <p>as a 2nd question. As importantly does it better enable controlled growth of new and established farms, to make it easier for farms to meet their various customers needs quickly and effectively with clear unambiguous direction and rules for us all</p>	03 Feb 2021

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	<p>to respect and follow?</p> <p>in support of above 2 questions it is the opinion of many many local people in rural occupations (farmers, farm hands, forestry workers, hedgelayers agricultural contractors cannot afford to live local to their place of work and policy is damning on allowing any development to support a rural enterprise in this local area) that real ambiguity exists in local plan guidance in policy on rural worker and rural worker type acceptable development in the green belt and Cotswolds AONB between local plan and the central Planning framework, in fact it is contradictory on what is allowable today, this as a result leads to people going to appeal and winning at appeal as the local plan is not supportive of central government policy, the section needs to be much clearer and refer to most upto date policy which is very much clearer today and flexible, on whats allowable and supported development that should be supported by local Government. A good example is taking this a step further the Bitton Local plan is very biased and contradictory even to the SGC local plan on allowable development of any kind in the green belt and definitely the Planning framework driven by central Government in England, not the view of the local people who now live in the community it remains biased to stop any development. Now is the time to strip away ambiguity and conflict and publish joined up strategy, that enables farmers and rural workers to flourish in what is a significant % of the SGC environment anyhow..the green belt and AONB</p>	
Lee Taylor	Please ensure these areas are protected forever	23 Jan 2021
Lesley Brown	<p>The video mentions looking at Greenbelt sites in order to use take any pressure off greenfield sites. Surely this goes against NPP which instructs that greenfield space must be used first before Greenbelt can be considered.</p> <p>Some rural areas such as Tormarton, Hawkesbury Upton etc. suffer from inadequate bus services. Personally, I would like to live in such areas but am completely put off by the lack of bus services. This is a great shame as it becomes an ever defeating problem with small rural schools, post offices etc. closing. It would be good if a small amount of housing and proper transport links could lead to a regeneration of those areas.</p> <p>I disagree that there should be any large scale growth in the Greenbelt. It would completely overwhelm the existing community. Existing settlements should not be expected to accommodate housing on such a large scale.</p> <p>It would completely ruin the character of any existing settlements and, in many cases, be disproportionate to the existing population. Such a large scale development would place far too much pressure on already stretched resources. I gather that there is no authority to eg. provide a new GP practice even if a developer provides the land for one. Local services could be overwhelmed to breaking point. Recent large developments have shown that there is always a delay in providing services, if at all. Only smaller scale developments should be considered. This would also be helpful to the local economy by aiding the smaller local construction companies.</p> <p>Key sustainability issues.</p>	15 Feb 2021

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	<p>Unfortunately as previously mentioned the DAPs and transport links tables are inaccurate and give a flawed impression of how communities would be able to accommodate further housing. I will address some specific areas that I am familiar with in comments on the Sustainability Appraisals/Evidence base. At a recent online meeting with the planning dept. to discuss the new plan several people from different areas commented that their DAPs were incorrect. It was said that "people on the ground" should tell the Planners what corrections should be made as it was difficult for them to keep track of what facilities etc. are available. I find it difficult to understand how this can be the case as there must be access to information on eg. business rates. I would be interested to know how the DAPs were compiled. It is alarming that decisions on where housing should go is being based on inaccurate information. THE DAPs AND TRANSPORT TABLES MUST BE CORRECTED BEFORE ANY DECISION IS MADE AS TO WHERE HOUSING SHOULD BE. THESE THEN NEED TO BE PUBLISHED BEFORE ANY DECISIONS ARE MADE.</p> <p>Key planning designations and considerations</p> <p>Green belt. it is said that "some villages in Green belt are near key services. 9and may not be covered by other planning designations or issues" - the fact NPP states that building in Green belt without first using all other available land in brownfield or greenfield is in itself a planning issue. It is not sufficient to say that Greenbelt should be used to avoid overloading settlements outside the greenbelt. This would go against NPP.</p> <p>I notice that heritage assets have been given great prominence in some areas even though the assets concerned are on the boundaries far away from existing housing. More housing could be accommodated and still be quite a distance from those assets</p> <p>Green Belt</p> <p>As per NPP the fundamental aim of Green Belt is to prevent urban sprawl. To this event I feel that only Option 1 Building outside of the Green Belt should be considered. I can see that it is tempting to build in greenbelt relatively near to the urban edge but in doing so the urban sprawl element of greenbelt would be lost. eg. Coalpit Heath has a massive amount of housing not far away in Lyde's Green (leading to Emerson's Green) which easily lead to a merge of the two areas.</p> <p>Option 1: Outside the Green Belt</p> <p>Coalpit Heath is incorrectly given in the text as an option for building when it is in fact in the Green Belt! The chart of non Greenbelt correctly omits it. Although the planners are asking for views on which option to support I get the impression that they have already decided to go with Option 2 as they are recommending it. I would point out that you describe as a negative a SAM being within or immediately adjacent to some villages. This is also the case for Coalpit Heath which has listed buildings and a SAM - The Ram Hill Colliery.</p> <p>Option 2 : Both inside and outside the greenbelt</p> <p>Positive : It is not sufficient to say that Greenbelt should be used to avoid</p>	

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	overloading settlements outside the greenbelt. This would go against NPP. Building in greenbelt near to urban edges risks merging with other areas. One of the primary reasons for the Greenbelt, as per NPP, is to prevent urban sprawl. The SAMs listed in Option 2 have omitted to include the SAM at Coalpit Heath - The Ram Hill Colliery..	
Linda Byrne - Siston Hill Residents Association	At all stages, you must make sure you consult with local residents in a meaningful way and be willing to listen to their concerns. i.e. not just 'tick-the-box' type consultation.	08 Dec 2020
Lizzie Staley	<p>Check with every existing household for their view and opinions on changing their home village or settlement, or you could create division and resentment towards the new builds.</p> <p>Previous sites with some of the above features have been developed despite the flood risks or the green spaces providing for nearby homes. I don't trust developers to respect these national policy issues.</p> <p>A green belt is there for a reason. It shouldn't shrink for the sake of greed.</p> <p>Small numbers of houses per rural village and settlement would be more respectful and manageable for them. Develop appropriately to the village or settlement. A large scale development is not an option.</p> <p>Walking and cycling distances may be completely different if there is one winding road or a windy muddy footpath to use, you can't just go straight through buildings, fields and other boundaries. Children and elderly can't do these lengths of journeys and they are the ones trying to get to health services and schools.</p> <p>Do you know how tiring it is for them to walk that far? How long it would take? How worn out they would be once they got to their destination? And would the destination have the facilities for those who have walked a long way to rest, to have a wash, or to safely store their bike and clothes that they travelled in?</p> <p>Walking to a school or service for a family includes the return walk, therefore doubling the distance. Parents do not have time to walk 4 miles to get their children to school, then 4 miles to pick them up. Parents have to work. Or walk or cycle on to do get the baby to nursery, then do the shopping or get to the meeting. This is as the crow flies too. Good luck scaling the hedges and fences and buildings and lifting your child whilst carrying the baby and your child's scooter and their school bag.</p>	28 Feb 2021
Lorna Gould	There is an area around established villages which contains long standing development but is not allowed to infill like the rest of the village as it has been segregated by a settlement boundary. The current settlement boundaries are not based on any methodology known to south glos council and should be reviewed.	28 Feb 2021
Louise Powell - Thornbury	Q14 - As before, if Green Belt is removed, it should be replaced in an equal amount.	08 Apr 2021

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Town Council	Q15 - No comment.	
Mactaggart & Mickel - Frampton Cotterell	<p>Support is given to the identification of a suitable level of housing growth in the rural areas.</p> <p>A Green Belt review is essential in the District and is long overdue.</p> <p>There are a range of rural settlements which lie outside of these obligations and not subject to any other constraints i.e. flooding.</p> <p>Settlements such as Frampton Cotterell have a wide range of services and facilities and are well placed to accommodate additional development. Accordingly, a review of the Green Belt should be undertaken now.</p>	07 Apr 2021
Mactaggart & Mickel Homes England Ltd	<p>See attached representations.</p> <p>3.20 The Local Plan should reflect relevant sections of national policy as set out in the NPPF and PPG in respect of the above issues, whilst according with the overarching thrust of national policy in respect of the achievement of sustainable development and significantly boosting housing supply.</p> <p>3.21 Our client supports the investigation of growth in rural communities in South Gloucestershire.</p> <p>3.22 The Local Plan identifies the following considerations in helping determine the level of growth in individual locations:</p> <ol style="list-style-type: none"> 1. Size of the existing settlement in terms of population and number of homes; 2. The level of planned and speculative growth that has been built or approved in recent years; 3. The suitability and capacity of existing infrastructure; 4. Key sustainability issues including access to services and facilities; 5. Key planning designations and considerations/constraints. <p>3.23 Allocating development within and adjacent to sustainable rural villages is crucial to efficient delivery of housing across the District and to ensuring that the sustainability and vitality of rural communities are enhanced. In adopting a 'planned growth' approach, development can respond at an appropriate scale to each rural settlement and ensure that the right support is provided to communities alongside the correct scale, form, mix and design of new development. The selection of such locations for development needs to be based on a thorough understanding of a broad range of material considerations. Many of those are identified in the Council's issues and priorities document. These include heritage assets, including Conservation Areas, Listed Buildings and sites of archaeological value. There are also landscape features like valleys, hillsides and escarpments, all</p>	05 May 2021

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	<p>of which help to create valuable, historic landscapes and distinctive places.</p> <p>3.24 It is considered that the first option to Green Belt (only investigate locations outside of GB) would not be sound as it would require a number of less sustainable settlements outside of the Green Belt to deliver to deliver a substantial proportion of the housing requirement. Furthermore, it is highly likely that South Gloucestershire will be expected to assist meeting a proportion of unmet housing needs arising from Bristol City, and therefore it would not be sound or sustainable to simply deliver these in locations that are beyond the Green Belt and highly detached from the urban area. It is considered that unmet housing needs should be met at or close to where they arise, i.e. near to Bristol. This is supported by paragraph 138 of the NPPF is clear that the need to promote sustainable development should be taken into account when reviewing Green Belt boundaries.</p> <p>3.25 A balancing exercise in understanding all of these issues, followed by an allocation of a mix of sites is the correct approach to determining the Spatial Strategy. Knight Frank fully support the review of settlements both within and outside of the Green Belt (Appendix 1: Option 2). The SA states in Paragraph 4.126 that:</p> <p>“In preparing subsequent stages of the Local Plan, the Council should consider a Spatial Strategy that includes a combination of villages and settlements within and outside the Green Belt. Option 2 performs better than Option 1 in sustainability terms, given its potential to provide residents with access to a wider range of services and facilities within the existing urban area.”</p>	
Mactaggart & Mickel - Pilning	<p>Flood defences have been or will be built to protect settlements like Pilning. Accordingly, opportunities should be taken to re-examine these settlements to fully understand their development potential.</p> <p>In addition, a review of the Green Belt around these settlements should also be undertaken.</p>	25 Mar 2021
Margaret Haynes	<p>The approach reads well. However I think some of the detail needs to be checked. For the statement that 'certain settlements in this option, including ... Wickwar ... have walking and cycling access to a range of services and facilities and, or public transport connections (mostly below 30 minute journeys) to places containing facilities not within walking and cycling distance.' may be true at face value (in that there are a few buses to Yate and Chipping Sodbury). However, the onward journeys to Bristol or Bath (or virtually anywhere other than Yate, Chipping Sodbury or Wotton) take far too long to be practical for commuters, or for (for example) a family wishing to shop at Cribbs Causeway. In practice, therefore, the majority of people have to drive to reach virtually any destination - we have many friends in Wickwar and not one of them would ever consider the public transport links adequate enough to use on a regular basis.</p>	27 Feb 2021
Marian Gilpin	<p>No building in the Green Belt. No building in the AONB. More bungalows in rural villages for elderly people wishing to downsize but stay in the village - this would release larger houses for families to move into.</p>	09 Feb 2021
Mark Rosher -	<p>I can only speak for Charfield, which while once proposed as a Strategic</p>	08 Dec

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Charfield Parish Council	Development Location under the now withdrawn and identifiably unsustainable JSP has now had so much speculative and won-on-appeal development it cannot host any more new developments. We are overwhelmed by new traffic flow, lack of infrastructure and most noticeably in this recent covid emergency a lack of green space - even in the countryside - for recreation. The PROWs are all muddy bogs and incapable of bearing the foot traffic we now have.	2020
Martyn Hall	Bring the 1/4 mile line to thornbury Grovesend and give Thornbury a railway line	26 Feb 2021
Matt Griffith - Business West	<p>63. It is refreshing to see the development needs of the rural villages and settlements have been taken into account when drafting this document. Rural areas have different planning and transport needs than the urban ones and this paper has addressed them correctly, previous negligence in doing so has led to speculative growth which endangers the historical and unique value of these areas.</p> <p>64. We support the medium to small scale developments in rural settlements, taking into account sustainability and infrastructure considerations, if that is justified under housing and employment.</p> <ul style="list-style-type: none"> o More opportunities for affordable housing and better access need to be considered a priority. o The ageing demography of these areas will require specific services and infrastructure for these areas in the coming years, and the Council must start planning for these now. <p>65. Good Public Transport to reduce the car dependency represents a big challenge as the frequency and volume of passengers might not make the service sustainable. The Council must propose innovative and low-Carbon solutions to these settlements, particularly for the Cotswolds Area of Outstanding Natural Beauty where there is a higher risk of isolation.</p> <p>66. Broadband connectivity must also be addressed as a priority for rural villages and services, as good connection will allow residents to work remotely and attract younger generations to the areas.</p>	25 Mar 2021
Matthew Blaken - DJ&P Newland Rennie Ltd	Query whether the Green Belt should wash over existing villages and immediately about the current settlement boundary.	14 Dec 2020
Matthew McCollom	Investigating 'appropriate' small and medium-scale growth. Whilst it is appropriate to consider small scale development in small rural communities it is entirely inappropriate to consider engulfing a small rural community with new development. The rural villages and settlements map identifies Shortwood as a community of 73 existing homes. Any development considered here should be in proportion to this.	28 Feb 2021
MATTHEW REGAN - M7 Planning	<p>Reviewing the Green Belt for Sustainable Growth:</p> <p>Some of the most sustainable future development sites in South Gloucestershire are</p>	06 May 2021

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Limited	<p>located within the Green Belt. Difficult choices therefore need to be made about the most appropriate growth pattern to ensure a successful Local Plan.</p> <p>We therefore strongly support the need for a Green Belt review, as part of the new Local Plan in order for the Plan to be robust, particularly with its driving requirement to foster Carbon neutrality in line with the climate emergency.</p> <p>Our interests at East of St. Francis Drive, is an excellent example of this, being within easy walking distance from Schools, recreational facilities and other amenities.</p> <p>In order to achieve a desirable level of output from a Green Belt review we would encourage the Council to approach the Green Belt Review on a target parcel size starting at 10 acres to avoid discounting highly sustainable opportunities within a much wider area of search.</p> <p>Sites of this scale also lend themselves to less deliverability issues than major allocations. We note that the Council readily admits that the speed of delivery of its previous urban extensions is significantly behind expectations.</p>	
Maurice Wayne	Access, green space and provision of services must be in scale with the development proposed	08 Feb 2021
Mel Clinton - Nash Partnership	The document recognises the potential for development within and around rural villages and settlements. As part of this, there should be recognition of both the potential for development within and on the edge of existing villages and settlements and for development to also create clusters of rural settlements where there is a symbiotic relationship between the constituent parts of the settlement cluster in terms of sustaining facilities and services to meet the needs of the community. Linked to this, the option of considering opportunities both within and outside the Green Belt is supported.	01 Mar 2021
Melinda Evans	<p>Nature Recovery Networks should be incorporated.</p> <p>Rural villages are often lacking in affordable homes, as urban areas are. Priority for any new homes in rural villages and settlements must be for those that are truly affordable, well designed, and sensitively located. For example in Olveston, the village school has suffered from a falling roll for some years and as a result has lost a teacher in the last year. Young families are not able to afford homes in this area.</p>	01 Mar 2021
Michael Sharpe-Neal	The proposals do not fully respect our heritage and go far enough to protect our landscape and countryside.	28 Feb 2021
Michelle Greaves	Should not build on flood plains or Cotswolds area/ protected areas/ green belt land which is designated protected	03 Feb 2021
Midland Commercial	<p>Please see enclosed submission.</p> <p>4.30 Given the focus on these representations in respect of employment land, we would simply note at this stage the strong emphasis on this section of the consultation document in terms of providing for new housing, rather than other land uses such as employment land. This is something that will need to be addressed</p>	26 Apr 2021

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	further as the Plan progresses.	
Mike Burgess	<p>Many of the villages in the area require VERY significant investment in social, economic & transport (including roads) infrastructure BEFORE even considering further large scale (15+ houses) speculative developments . Many of current developments give minimal support to local employment prospects either during construction, or subsequently.. but simply encourage commuting with infrastructure totally inadequate for access by public transport or foot/cycling For example it is unrealistic to apply simplistic assumptions such as 2km walking/ 5.6km cycling on a daily basis even if journeys such as Wickwar > Yate or Chipping Sodbury were thus defined. By observation , people drive their children to school in Wickwar from WITHIN the parish boundaries so no chance of them walking 2km!</p> <p>At the other end of the age spectrum , there are no medical facilities accessible other than by totally inadequate public transport in either Wotton or Yate. I know..I am 70!</p>	21 Feb 2021
Miller	<p>There must also be transport links for schools, that are not just for those on benefits or charged out at extortionate rates to those who are not on benefits.</p> <p>Equally money should not be spent on gypsy communities they do not contribute to the Wider community Either financially nor as respectful residents</p>	01 Dec 2020
Mr. A. D. England	<p>Please see enclosed submission.</p> <ul style="list-style-type: none"> • Our client supports the growth of rural villages to ensure the vibrancy of existing services and facilities, to support the delivery of new community infrastructure and to avoid localised housing land supply issues and associated affordability impacts. However, growth should be focussed at only the most sustainable settlements. Many of the rural villages are relatively isolated with limited facilities and development at these locations could cause detrimental harm and it is therefore critical that the SA process is used to inform and eliminate such settlements from further review due to their lack of sustainable accessibility; <p>7.1 We support the Council in considering the potential for all scales of development in rural villages and settlements. In considering an ‘appropriate’ level of growth, the Council set out the key considerations as being:</p> <ol style="list-style-type: none"> 1. The size of existing village and settlements – relating to populations and the number of existing homes; and 2. The level of planned and speculative growth that has been built or approved in individual communities in recent years, if applicable. <p>7.2 Despite its clear sustainability credentials, only 39 homes have been completed at Almondsbury between 2011 and 2021 (based on residential land survey data). The actual level of growth at Almondsbury has therefore not been proportionate with wider population projections and is not considered sufficient to support a strong and vibrant community. In order to comply with Paragraph 8(b) of the NPPF a sufficient level of growth should be provided to Almondsbury.</p> <p>7.3 The consultation document includes Green Belt as a key planning designation</p>	29 Mar 2021

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	<p>when investigating an appropriate level of growth. South Gloucestershire has such a high percentage of land within the Green Belt that it would be non-sensical to remove these Green Belt settlements from consideration and place development within the most isolated unsustainable communities, albeit causing no harm to the Green Belt.</p> <p>7.4 We fully support the Council in identifying the need to undertake a full review of the Green Belt. Any review should be undertaken against the backdrop of the Council having declared a Climate Emergency. The ‘exceptional circumstances’ for releasing land from the Green Belt should accordingly be based upon locations which have the greatest locational sustainability and accessibility credentials – these being sites with good access to employment areas and Bristol City Centre.</p> <p>7.5 We fully support the review of settlements both within, and outside of the Green Belt (Appendix 1: Option 2). The SA states at Paragraph 4.126 that:</p> <p>“In preparing subsequent stages of the Local Plan, the Council should consider a Spatial Strategy that includes a combination of villages and settlements within and outside the Green Belt. Option 2 performs better than Option 1 in sustainability terms, given its potential to provide residents with access to a wider range of services and facilities within the existing urban area.”</p> <p>7.6 Our client considers that in order for the Plan to be successful the role and function of settlements across the District needs to have a higher priority (above Green Belt) within this allocation process.</p> <p>7.7 The Council is at a very early stage of the Local Plan process therefore we consider it to be critical to the success of the Plan that all settlements within and outside of the Green Belt are considered from the outset. We do not suggest that some development is then placed at each of these locations but rather, through a more detailed assessment with input from statutory consultees and ongoing public consultation, the Council will reach a point where they have a list of the most sustainable locations to deliver their housing requirement.</p> <p>7.8 All rural settlements should be considered on their own merits and through the SA process the most sustainable settlement options for development should be identified.</p> <p>7.9 As the Green Belt covers more than half of the District of South Gloucestershire, we consider it necessary to first evaluate all rural settlements based on their sustainability and access to services and facilities, rather than location within the Green Belt. The Council needs to determine which settlements are the most sustainable and capable of accommodating sustainable growth.</p> <p>7.10 We see the merit in allocating small sites in rural areas, yet in many villages across South Gloucestershire significant allocations would not represent sustainable development as they just do not have the correct level of existing local facilities.</p>	
Mr. and Mrs. Drew and Mr.	Section 7 states, “Planning for some level of growth, like new homes, employment and key services and facilities, in appropriate rural villages and settlements, can	19 Apr 2021

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and Mrs. Bennett	<p>play an important role in making sure that the long term vitality, vibrancy and overall sustainability of our rural communities is maintained.”</p> <p>The above commentary is supported, and by allowing the proportionate level of growth that is envisaged on my clients' land at Cromhall, this will positively benefit the vitality, vibrancy and overall sustainability of Cromhall.</p> <p>Cromhall is an ideal location for “rural villages” growth, given that it is outside of the Green Belt, the Cotswolds Area of Outstanding Natural Beauty and has no Flood Risk constraint.</p>	
Mr. Blake - Oldland Parish Council	Nothing specific	17 Feb 2021
Neil Oviatt	Make planners accountable for their decisions! there currently is none!	30 Nov 2020
Newland Homes - Land at Aust Road	<p>5.1 The approach to areas of flood risk is considered appropriate. We have discussed this in more detail above, however, our position is that development in areas of higher flood risk is inherently less sustainable than development in areas of lower flood risk. The former should, therefore, be avoided where appropriate alternatives are available as per the guidance in the NPPF and PPG.</p> <p>5.2 Regarding AONBs, we support the exploration of a strategy to deliver growth in rural areas in the interests of maintaining the vitality and viability of these communities and combating affordability issues. However, we note that the need to protect valued landscapes means that development in these locations will need to be relatively small scale.</p> <p>5.3 With regard to rural communities in the Green Belt, we agree that the first stage is to establish whether the District's development needs can be met without impinging upon the Green Belt, or if there are exceptional circumstances that would justify its release.</p> <p>5.4 The guiding principles for identifying potential growth locations strongly indicates that land around the Bristol urban fringe, Yate and key transit routes (e.g. Coalpit Heath and Frampton Cotterell) have clear sustainability benefits over development in non-Green Belt locations that would justify their release.</p> <p>5.5 With regard to smaller settlements, the question is whether their development needs/requirements can be met through the exceptions set out in paragraph 145 of the NPPF (limited infilling, redevelopment of Brownfield sites, rural exceptions sites for affordable housing etc) or if this would dictate a more direct approach (e.g. formal allocations).</p> <p>5.6 The Phase 1 document suggests that the housing requirement, coupled with constraints at villages beyond the Green Belt, will likely mean a proportion of growth needs to be directed to settlements within the Green Belt as well. This is supported by the Sustainability Appraisal which has indicated clear benefits associated with directing growth toward villages within the Green Belt (table 4.7 of</p>	14 May 2021

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	<p>the SA). This is a welcome start; however, we note that a flaw of the JSP and a common pitfall of other Local Plans is the failure to provide a robust assessment in support of the exceptional circumstances being demonstrated (e.g. Ashfield District Council and Amber Valley Borough Council fell at the Examination in Public stage due to the poor quality of the evidence in respect of Green Belt release). We would suggest a dedicated topic paper be prepared in support of the Plan if, as we expect, Green Belt releases be required to support the development needs of the District.</p> <p>5.7 We agree that the new Local Plan will need to explore the possibility of growth at rural settlements in the Green Belt for a range of development scales to underpin housing delivery from the larger strategic sites that will also be necessary to meet the overall housing requirements.</p> <p>5.8 This will, ultimately, be dictated in part by the scale of the housing requirement and reliance that will be placed on strategic sites. A significant advantage of a dispersed approach to housing distribution is that delivery is likely to be less of an issue. However, we acknowledge that there are trade-offs with achieving wider sustainability objectives and so an appropriate balance will need to be struck.</p> <p>5.9 The obvious advantage for settlements in the Green Belt is that they tend to be better related to the Bristol Urban Fringe and market towns of Yate, Thornbury and Chipping Sodbury where services, facilities and employment opportunities are more readily accessible. There is, therefore, greater potential for development to achieve the sustainability objectives set out in the Phase 1 document through development at rural settlements.</p> <p>5.10 There are a handful of ways in which the Council could manage development at the rural villages; however, we would support the identification of allocations at settlements, either through this Plan or a subsequent site allocations plan. This is more important for the Green Belt villages given that boundaries can only be altered by Local Plans. This may be the preferred approach in the interests of ensuring delivery at these settlements can come forward earlier in the Plan period.</p> <p>5.11 Alternatively, the process of identifying site allocations could be deferred to the Neighbourhood Plan (NHP) process, at least for certain Parishes where these are being progressed. However, it will be important for the Local Plan to establish what the requirement for these areas would be and establish the exceptional circumstances necessary to justify development within the identified Parishes. A view can be taken at a later date as to whether a Site Allocations Plan would need to be progressed if insufficient progress has been made on any emerging NHPs.</p> <p>Do you have any comments on our proposed approach to investigate an appropriate level of growth in our rural villages and settlements?</p> <p>5.12 We support the principle of seeking to ensure that development at the rural villages is Plan-led in light of the level of speculative development that has come forward at them in recent years.</p> <p>5.13 Whilst strategic levels of development will be required to sustainably meet the</p>	

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	<p>bulk of the Council's housing requirement, development at villages where large-scale development is not possible will still be required to support the vitality and viability of those settlements and address affordability issues.</p> <p>5.14 In terms of the approach to investigating the appropriate levels of growth that should come forward at the rural villages, the two options are appropriate starting points and will need to be subject to an appropriate Sustainability Appraisal to establish which should ultimately be pursued. The approach may then need to be refined in terms of identifying which rural settlements in the Green Belt should be prioritised based on the application of the guiding principles outlined within the consultation document.</p>	
<p>Newland Homes - Land West of The B4061 Bristol Road</p>	<p>5.1 The approach to areas of flood risk is considered appropriate. We have discussed this in more detail above, however, our position is that development in areas of higher flood risk is inherently less sustainable than development in areas of lower flood risk. The former should, therefore, be avoided where appropriate alternatives are available as per the guidance in the NPPF and PPG.</p> <p>5.2 Regarding AONBs, we support the exploration of a strategy to deliver growth in rural areas in the interests of maintaining the vitality and viability of these communities and combating affordability issues. However, we note that the need to protect valued landscapes means that development in these locations will need to be relatively small scale.</p> <p>5.3 With regard to rural communities in the Green Belt, we agree that the first stage is to establish whether the district's development needs can be met without impinging upon the Green Belt, or if there are exceptional circumstances that would justify its release.</p> <p>5.4 The guiding principles for identifying potential growth locations strongly indicates that land around the Bristol urban fringe, Yate and key transit routes (e.g. Coalpit Heath and Frampton Cotterell) have clear sustainability benefits over development in non-Green Belt locations that would justify their release.</p> <p>5.5 With regard to smaller settlements, the question is whether their development needs/requirements can be met through the exceptions set out in paragraph 145 of the NPPF (limited infilling, redevelopment of Brownfield sites, rural exceptions sites for affordable housing etc) or if this would dictate a more direct approach (e.g. formal allocations).</p> <p>5.6 The Phase 1 document suggests that the housing requirement, coupled with constraints at villages beyond the Green Belt, will likely mean a proportion of growth needs to be directed to settlements within the Green Belt as well. This is supported by the Sustainability Appraisal which has indicated clear benefits associated with directing growth toward villages within the Green Belt (table 4.7 of the SA). This is a welcome start; however, we note that a flaw of the JSP and a common pitfall of other Local Plans is the failure to provide a robust assessment in support of the exceptional circumstances being demonstrated (e.g. Ashfield District Council and Amber Valley Borough Council fell at the Examination in Public stage due to the poor quality of the evidence in respect of Green Belt release). We would</p>	<p>13 May 2021</p>

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	<p>suggest a dedicated topic paper be prepared in support of the Plan if, as we expect, Green Belt releases be required to support the development needs of the District.</p> <p>5.7 We agree that the new Local Plan will need to explore the possibility of growth at rural settlements in the Green Belt for a range of development scales to underpin housing delivery from the larger strategic sites that will also be necessary to meet the overall housing requirements.</p> <p>5.8 This will, ultimately, be dictated in part by the scale of the housing requirement and reliance that will be placed on strategic sites. A significant advantage of a dispersed approach to housing distribution is that delivery is likely to be less of an issue. However, we acknowledge that there are trade-offs with achieving wider sustainability objectives and so an appropriate balance will need to be struck.</p> <p>5.9 The obvious advantage for settlements in the Green Belt is that they tend to be better related to the Bristol Urban Fringe and market towns of Yate, Thornbury and Chipping Sodbury where services, facilities and employment opportunities are more readily accessible. There is, therefore, greater potential for development to achieve the sustainability objectives set out in the Phase 1 document through development at rural settlements.</p> <p>5.10 There are a handful of ways in which the Council could manage development at the rural villages; however, we would support the identification of allocations at settlements, either through this Plan or a subsequent site allocations plan. This is more important for the Green Belt villages given that boundaries can only be altered by Local Plans. This may be the preferred approach in the interests of ensuring delivery at these settlements can come forward earlier in the Plan period.</p> <p>5.11 Alternatively, the process of identifying site allocations could be deferred to the Neighbourhood Plan (NHP) process, at least for certain Parishes where these are being progressed. However, it will be important for the Local Plan to establish what the requirement for these areas would be and establish the exceptional circumstances necessary to justify development within the identified Parishes. A view can be taken at a later date as to whether a Site Allocations Plan would need to be progressed if insufficient progress has been made on any emerging NHPs.</p> <p>5.12 We support the principle of seeking to ensure that development at the rural villages is Plan-led in light of the level of speculative development that has come forward at them in recent years.</p> <p>5.13 Whilst strategic levels of development will be required to sustainably meet the bulk of the Council's housing requirement, development at villages where large-scale development is not possible will still be required to support the vitality and viability of those settlements and address affordability issues.</p> <p>5.14 In terms of the approach to investigating the appropriate levels of growth that should come forward at the rural villages, the two options are appropriate starting points and will need to be subject to an appropriate Sustainability Appraisal to establish which should ultimately be pursued. The approach may then need to be</p>	

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	refined in terms of identifying which rural settlements in the Green Belt should be prioritised based on the application of the guiding principles outlined within the consultation document.	
Nicholas Small - Stagecoach West	<p data-bbox="336 405 1342 517">Obviously any strategy that tends towards widespread dispersal across the rural hinterland of the Plan area cannot credibly be considered sustainable and soundly based.</p> <p data-bbox="336 546 1342 696">We note the 5 considerations set out in the consultation document. While understandable we aren't at all clear how those considerations would lead to criteria that could rationally and consistently be applied without leading to some quite perverse and unhelpful conclusions.</p> <p data-bbox="336 725 1342 936">The potential to catalyse a step change in self-containment in the settlement itself and among a wider cluster of rural communities, AND the potential to catalyse a step change in sustainable mobility, do not feature at all as considerations. Yet, these two issues lie at the heart of determining where in the rural area, if at all, development should take place as part of a robustly-based sustainable spatial approach.</p> <p data-bbox="336 965 1342 1176">Obviously this potential is likely to exist in very few instances. However where it does exist, it makes it still the more important that it is properly evaluated from first principles. Not only that it makes it possible to appropriately locate development that does contribute to those housing needs that do exist in the rural part of the Plan area, much smaller though these unquestionably are. The vitality of rural communities and economies is an important consideration as NPPF makes clear.</p> <p data-bbox="336 1205 1342 1393">This being the case, in the context of having identified existing and credibly deliverable sustainable transport corridors, there may be a very few localities that do warrant some expansion and consolidation. These might be better understood as expanded villages and this would have some overlap with a new settlement concept.</p> <p data-bbox="336 1422 1342 1856">Charfield, where the Council continues to press for a new rail station is obviously just one such, and we have already made plain in a number of responses that there are significant bus based Public Transport opportunities here too, linking in with a wider corridor from BNF/Thornbury across Junction 14 of the M5 towards Wotton Under Edge. The immediate presence of major employment at Charfield just across the boundary within Stroud District at New Mills, within Kingswood Parish, where 10Ha further employment development is an emerging allocation in the Stroud District Local Plan Review, consolidating not only existing activities but a current major partly -implemented commitment, is in our view highly relevant to this area and the wider potential to anchor a greatly more attractive Public Transport corridor. We have separately made this point to Stroud District Council in our duly-made representations to them.</p> <p data-bbox="336 1886 1342 2027">We also note that Wickwar continues to be under significant development pressure. This is much more remote from key destinations to the South and West – with the exception of Yate. However there is an existing bus service that might be consolidated here. Uncomfortable though it is for us to state this, given how far</p>	01 Mar 2021

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	<p>Green Belt constrains the kinds of site that might come forward in the short term, there may be little practical choice to release some more land here in order to ensure that the housing trajectory can be maintained. If so then the limited potential for this much weaker corridor needs to be maximised.</p> <p>We have highlighted the Easter Compton area which could benefit from a relatively easily deliverable direct sustainable access connection between Bristol, at Cribbs Causeway. This would run South of, and outside, the current village across currently open land, largely following the route of an existing adopted highway, stopped up to motor vehicles. Development outside the village on this route could create a complementary small rural settlement that depending on urban design and the approach taken to the interface with the existing settlement, could in some important regards boost the self-containment of the existing village as well as transform its Public Transport and cycling choices.</p> <p>Off-line of these corridors it is hard to see that development on anything other than the smallest scale would be appropriate. Indeed there may even be a case to seek to limit population growth in the smallest and most obviously car-dependent rural settlements through other development control policies, with a greater focus only on meeting the needs associated with the local rural economy.</p>	
Nick Woodward	Green space is a valuable asset to communities for its appearance, leisure pursuits, wildlife and environment. Development in these areas leads to light and noise pollution and adversely affects wildlife. Rural communities with no safe links with neighbouring urban town settlements should not be considered suitable for any further development.	28 Feb 2021
Nicola Flack	<p>There needs to be a more thorough analysis of infrastructure, in particular roads at a local level and accurate descriptions of the areas. It also needs to take into account rural locations which are split and describe these separately, Lower Almondsbury where I live and Almondsbury. If you're in Lower Almondsbury you do not have a regular bus service, cycling down the lanes is extremely dangerous and there aren't multiple schools within a safe walking distance. There is 1 excellent school in the village itself with 45 places per year group. We don't have good broadband we have a wire from a pole into the house which is impacted by very wet and windy weather. It's insulting to call the village shop a convenience store. It is a Community Shop, it was set up by and is run entirely by local volunteers and has won awards thanks to its excellence.</p> <p>It is not safe to walk up or down the footpaths from the lower village to the A38 in the dark on your own, so that makes a work or school commute questionable via that route.</p> <p>If you are elderly and live up the hill in Almondsbury accessing the doctor, dentist and shop on foot is for many impossible, transport is needed.</p>	31 Jan 2021
Nicola Jordan	Green belt, rural villages and hamlets should be protected from urban sprawl; their historic identity preserved. The plan does not go far enough to support this e.g. Call for Sites Park Mill Farm and Quarry Farm.	25 Feb 2021
Nicola O'Connell	See answer to question 13	27 Feb 2021
North	None.	29 Apr

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Thornbury Landowners Consortium		2021
P. Church	<p data-bbox="339 409 683 443">See attached representations.</p> <p data-bbox="339 483 1334 969">The Council should assess each Rural Settlement as part of a detailed Sustainability Appraisal which is utilised to inform the selection of development sites around these settlements. Such a systematic approach, assessment and the identification of the most sustainable Rural Villages for development would be in accordance with the Council’s Climate Emergency Strategy. The Local Plan 2020 should allocate sites within or adjacent to rural areas that are inherently connected to existing settlements in proximity to strategic employment facilities, well served by sustainable transport infrastructure and that provide opportunities to maximise the use of both Public Transport and active travel routes. Prioritising growth in areas that benefit from such principles will help South Gloucestershire Council achieve a better balance between future employment and residential requirements, reduce the need and reliance on private transport to commute further afield whilst encouraging more active forms of transport, thereby reducing Carbon emission through healthier lifestyle choices.</p> <p data-bbox="339 1010 1254 1043">Creating Sustainable Rural Villages and Settlements (Questions 14, 15 &16):</p> <p data-bbox="339 1084 1329 1532">Allocating development within and adjacent to sustainable Rural Villages is crucial to efficient delivery of housing across the District and ensuring that our rural communities’ sustainability and vitality are enhanced. In adopting a ‘planned growth’ approach, development can respond to each rural settlement’s identified needs and ensure that the right support is provided to communities alongside the correct scale, form, mix and design of new development. The selection of such locations for development needs to be based on a thorough understanding of a broad range of material considerations. Many of those are identified in the Council’s issues and priorities document. These include heritage assets, including Conservation Areas, Listed Buildings and sites of archaeological value, among other technical considerations. There are also landscape features like valleys, hillsides and escarpments, all of which help to create valuable, historic landscapes and distinctive places.</p> <p data-bbox="339 1572 1334 1706">A balancing exercise in understanding all of these issues, followed by an allocation of a mix of sites, is the correct approach to determining the Spatial Strategy. Knight Frank fully support the review of settlements both within and outside of the Green Belt (Appendix 1: Option 2). The SA states in Paragraph 4.126 that:</p> <p data-bbox="339 1747 1318 1917">“In preparing subsequent stages of the Local Plan, the Council should consider a Spatial Strategy that includes a combination of villages and settlements within and outside the Green Belt. Option 2 performs better than Option 1 in sustainability terms, given its potential to provide residents with access to a wider range of services and facilities within the existing urban area.”</p> <p data-bbox="339 1957 1299 2022">Knight Frank agree with the need to consider all settlements within or outside of the Green Belt for new development. The retention of the Green Belt means that,</p>	27 Apr 2021

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	<p>apart from urban intensification, the focus of development is further away from the Bristol urban area, which would be a less effective way of meeting housing and affordable housing needs. Also, there is clear evidence of Green Belt's protection's adverse consequences at the expense of all other objectives and priorities, including environmental protection, Climate Change, delivering a sufficient supply of homes, among others.</p> <p>Winterbourne is a sustainable settlement with access to a good range of services and facilities within walking and cycling distance and performs excellently against many of the sustainability principal issues identified in the Council's Phase 1 Issues and Approaches document. The Village is also on a main arterial Public Transport routes into the urban centre and fringes of Bristol, providing opportunities for mass transit and reducing the use of private vehicles. As previously identified, the Council's SA recognises the role that sustainable rural settlements can play in contributing towards Climate Change mitigation.</p> <p>The NPPF is explicit in its support for rural villages at Paragraph 77, 78, 83 and 84. This includes identifying land for development to meet the community's market housing, affordable housing, and economic needs.</p>	
Patricia Trull - South Glos Council	If you build in rural villages then you must consider the landscape. Just building fields of 4 and 5 bed houses is not sustainable. if you want young people to come into a village and put their mark on the environment, you really have to start looking at 1 and two bed housing. Make it so that local people can stay where their extended family lives. This is so important with family continuity and history. But alas, transport is lacking, no footpaths and cycle lanes. Car dependent, no matter what the blurb says.	08 Dec 2020
Patrick Williams	Note my comments to 13. For villages if there is a need for property it should only be in small pockets of land to retain the character of the villages and their surrounding countryside.	09 Mar 2021
Paula Evans - Rangeworthy Parish Council	Due to total disregard of planning restraints by Local Authority planning officers, ie settlement boundaries and green belt designation, our village has seen unprecedented speculative development over the last 6-years. Numerous sites with a case history going back decades of refusals have been granted permission. Nothing has changed with regard to previous reasons for refusals, ie access, sewer, traffic etc. In fact, levels of traffic have increased as residents become more reliant on their cars because of poor public transport infrastructure. Drainage and flooding (including sewerage) issues have stayed the same or become worse despite attempts at remedial/mitigation works by water utility companies. Council Officers and Councillors should adhere to the current framework of rules until such time as they are changed, with the adoption of a new Plan.	26 Feb 2021
Paul Cottington - National Farmers Union	We are concerned that there is insufficient policy guidance to enable the development of rural worker dwellings for farms. A consequence of more and more complex farming businesses and the need to support a number of families on one holding means there needs to be greater access to farm dwellings. In addition, the need to provide high-quality dwellings for workers means the size and quality of the dwellings needs to be higher.	15 Feb 2021
Pauline and	This is a wonderful wish list but will be difficult to achieve.	25 Feb

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Richard Wilson	<p>We agree that villages need some small additions to housing stock. However new speculative development taking place in villages before the Local Plan is produced must be taken into account when considering the amount of further development. This should be a guarantee not open to pressure. Development should not be allowed to swamp a village.</p> <p>Issue 34: Small sites up to 1 hectare should say approximately how many houses. General public do not know what this figure represents and they would need to relate it to the size of their village. Can a developer divide up a larger site into sections less than 1 hectare and develop them at different times?</p> <p>On the map of rural villages why is Codrington not included. It is 'a recognised collection of dwellings' and is on a major communication route? Little Sodbury is a village but is not included on the map of rural villages.</p> <p>Development around existing settlements: '200 metres from that development' is mentioned but is this the near or far edge?</p> <p>DAPs: The DAPs are too simplistic. The circles as the crow flies do not relate to actual distances of routes. Demographics must be up to date, not as listed. 2 miles to a Primary school is too far to walk especially when you consider that will probably not be on a pavement, the pupils might be very young and the parent will end up walking 8 miles per day. 1200 metres to a supermarket is too far when you consider walking home again loaded with shopping. Bus services must run at suitable times for journeys to and from school and to and from work. These times are not the same.</p>	2021
Persimmon Homes Severn Valley	Please see attached document.	11 May 2021
Pete Connors	<p>Although I have marked "agree" above I have great concerns about the data which is used for my local area: Coalpit Heath. Although I accept that the DAP is "at a point in time" the presence of a long closed post office is just one of many inaccuracies. The current number of homes looks to be an underestimate and, in any case, Coalpit Heath and the far larger Frampton Cotterell adjoin each other and developments in either have an effect on the shared infrastructure rather than being entirely separate entities.</p> <p>It is reassuring that it is noted in the planning documents that "any proposed growth should be 'appropriate' for the village or settlement it is located in. By this, we mean that it should be proportionate and sensitive to the village or settlement's sustainability, and take into account any potential impacts on its character and function over the next 10, 15 and possibly 20 years." This seems to me to be fundamental and must be adhered to.</p>	28 Feb 2021
Peter Box	The phrase 'Creating Rural Villages and Settlements' sounds like a reversion to the	23 Feb

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	discredited 'Buckover Garden Village' concept: unwise, unnecessary and definitely unpopular.	2021
Peter Rawlinson - Gleeson Strategic Land	<p>Whilst sustainable travel is an important consideration for the Local Plan it must not be the only factor in deciding where new development should be located. The NPPF and the Consultation Documents recognises that to achieve the ongoing sustainability of rural villages and settlements it is important that they also gain from the benefits of new growth.</p> <p>Rural villages and settlements will not have the same access to services and facilities as urban areas. However, account must also be taken for where people want to live and rural settlements can provide other important benefits such as access to the countryside and outdoor activities. It is also important to ensure that existing rural settlements continue to thrive, and this can be delivered through an appropriate amount of new growth. This is supported at the national level in NPPF paragraph 78, which sets out that ‘to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.’</p> <p>New opportunities for increased working from home and online shopping and delivery services will reduce the need to travel by private car overall. Distances to key services should take into account the frequency that people will need or want to visit particular facilities. For example, an appropriate distance of 800m from a Pharmacy is arguably not a good indication for how sustainable a location is. Most people would get a regular prescription once a month and it is possible to have this delivered by post for no additional cost.</p> <p>The sustainability of a location is often more nuanced than looking at distances to certain facilities. Individuals will have varied travel patterns and visit different places at different frequencies. It is therefore suggested that whilst the rural settlements Data & Access Profiles can provide an initial high-level view of sustainability, the merits of each potential new housing site will need to be considered in a wider holistic view and factor in the benefits a new development could bring vitality to a local community.</p> <p>Rural schools are an important part of a local community and a local School can encourage young families to either move to or remain living in a settlement. The Consultation Document recognises that rural Schools are facing pressures due to the relatively low numbers of children on roll. Gleeson’s site at Land East of Marshfield is adjacent to Marshfield Primary School. The Data Access Profile for Marshfield indicates there has been a population decrease of 41% for ages 0 - 4 between 2011 and 2018 which will have a knock-on effect to the number of new pupils enrolling at the School. Marshfield is an attractive place to live with good facilities and a strong community, but property prices are high and therefore out of reach for many young families. It is therefore important that new market and Affordable Housing is built at Marshfield to support the existing services and facilities, such as the Primary School, before they become unsustainable and have to close. Once this happens it will become increasingly difficult to bring them back which will weaken the existing community as a whole.</p>	10 Mar 2021

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	<p>Gleeson strongly agrees with the intention of the Council to investigate the potential for an appropriate level of small to medium-scale growth in villages and settlements inside the Green Belt and agrees that Green Belt release will be required to meet the Local Plan housing requirement. The NPPF at paragraphs 136 & 137 makes provision for the ability of Local Plans to alter Green Belt boundaries in ‘exceptional circumstances’ where fully evidenced and justified. The aforementioned benefits to rural villages and settlements should weigh heavily in favour of new development at these locations and this will require Green Belt release. It is therefore vital that the existing Green Belt boundaries are fully investigated and in detail down to the individual settlement level. The Green Belt study carried out to inform the West of England Joint Spatial Plan concluded that the Green Belt around Marshfield serves only two of the five Green Belt purposes, namely safeguarding the countryside from encroachment and assisting urban regeneration. This gives a strong initial indication that Green Belt release could be achieved around Marshfield without significant harm to the wider Green Belt.</p> <p>Gleeson also strongly agrees that development within the Cotswold Area of Outstanding Natural Beauty (AONB) should be investigated and consider it will be essential to ensure the ongoing vitality of the rural settlements and villages within it. Sites that could accommodate new development without unacceptable harm to the AONB should therefore be considered suitable for development during the site selection process. Development locations such as Marshfield can also improve access to the AONB, and new development can provide opportunities for home ownership for those that may have been priced out of living in more affluent areas.</p>	
Progress Land Ltd	<p>P. 120/125:</p> <p>The Council’s open and honest approach to assessing potential for small to large scale development in and around existing settlements is welcomed. It is of course noted that existing residents will undoubtedly be concerned about the potential implications of any new development proposed. In this respect, there is a clear role for the Council and site promoters to work together proactively to identify potential implications of new development proposals and any corresponding mitigation required.</p> <p>To this end, we would welcome discussions with the Council about our client’s site at Sycamores, pursuant to this consultation submission, and in advance of the forthcoming Phase 2 consultation.</p> <p>At page 125 of the consultation document, it states:</p> <p>When considering and investigating the level of growth that might be appropriate in individual villages and settlements, it is important to understand how any growth might support existing services and facilities, or provide new services and facilities, and in doing so help to create more sustainable communities. It is also be important to understand and recognise that new transport infrastructure or development may also lead to an enhancement of the level of sustainable access to key services and facilities in specific villages and settlements.</p>	11 May 2021

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	<p>As noted above, we are keen to work with the Council and the promoters of the adjacent Buckover site to better understand the implications of the proposed sites. Furthermore, we would contend that the potential to provide a new rail link to Thornbury, as well as new bus routes, would lead to a clear enhancement of transport provision for existing residents, and should thus be given significant weight in favour of our proposals.</p> <p>The opportunity to provide a train station as part of a funded package of measures for Thornbury, in conjunction with the Garden Village, could support a more sustainable method of transport for the wider region that could potentially stretch into other Authorities.</p> <p>There is merit in exploring the potential for a larger GV to help support a train station at Thornbury providing additional infrastructure funds and patronage which would benefit the whole of Thornbury and this part of South Gloucestershire in terms of sustainable connections.</p> <p>In respect of Flood risk it is appropriate to consider what is stated at page 127:</p> <p>At this stage, because we do not yet know the level of growth we need to plan for, we aren't able to demonstrate that we can meet our needs completely in the areas of South Gloucestershire in Flood Zone 1. We are, therefore, unable to rule out growth in any of the villages and settlements in areas of high flood risk.</p> <p>The sequential approach to growth should be followed and land in the lowest flood zone category should be developed first. It is not sensible to allocate land in higher category flood zones in outlying rural villages above the creation of a new settlement in flood zone 1 on a major Public Transport corridor into the North Fringe and adjacent to other settlements which could benefit from growth?</p>	
R. Brown	<p>There should be no large scale development of greenbelt land. If as a final last resort after all possible other options have been exhausted only small developments should be allowed. If necessary these should be dispersed throughout the greenbelt so as not to impact on the effectiveness of the greenbelt. Urban sprawl should not be allowed to happen which is one of the major reasons for the greenbelt. Relocation of the greenbelt must not be an option.</p> <p>Increasing housing in rural areas of small population results in more commuting that cannot be by walking and cycling due to the distance away from high employment areas. Public transport and other services are already inadequate for rural locations. To have sustainable rural villages a minimum level of facilities must be provided such as doctor surgeries, dentist, schools etc. These facilities are not always economically sustainable for privately owned businesses that is becoming the norm especially due to the privatisation of the NHS.</p> <p>Key planning designations & considerations</p> <p>Stating that greenbelt should be used to avoid overloading settlements outside the the greenbelt contradicts the NPP guidance. Also heritage assets have been given great prominence in some areas even though they are on areas away from existing houses and more housing could be built without impacting on them.</p>	25 Feb 2021

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	<p>Greenbelt As one of the main reasons for the greenbelt is to prevent urban sprawl only option 1 Building outside the greenbelt should be considered. The previous JSP recommended building at Coalpit Heath which is one of the narrowest areas of greenbelt and would end up coalescing with Lyde Green,</p> <p>Option 1 Outside the greenbelt Coalpit Heath is wrongly identified in the text as being an option for building when it is actually inside the greenbelt. The chart of non-greenbelt correctly identifies it. The document describes as a negative a SAM being within or immediately adjacent to villages. This is actually the case for Coalpit Heath which has listed buildings and a SAM i.e The Ram Hill Colliery.</p> <p>Option 2 Both inside and outside the greenbelt It is wrong to say the greenbelt should be used so as not to overload settlements outside the greenbelt. This is contrary to the NPP. The SAM listed in option 2 has missed off The Ram Hill Colliery SAM at Coalpit Heath.</p>	
Rachel Davis - Wickwar Parish Council	<p>Wickwar Parish Council broadly agrees with the five key sustainability and planning policy considerations identified for investigating appropriate levels of growth in rural villages.</p> <p>It is noted however, that consideration 4 – sustainable access to key services and facilities, does not explicitly mention sustainable access to employment. The huge impact of commuting by private car from South Gloucestershire’s villages on Issue1: Climate change mitigation, Issue 2: Climate change adaptation and resilience and Issue 41: Decarbonising transport, are simply not addressed in the consultation document. Any new development in rural areas will increase commuting by car, without significant investment in infrastructure and public transport linking South Gloucestershire villages with market towns and the urban fringe of Bristol. This is particularly the case in Wickwar, as is set out below.</p> <p>The Parish Council makes the following observations about how these considerations apply to the village of Wickwar specifically.</p> <p>Consideration 2. The level of planned and speculative growth that has been built or approved in individual communities in recent years, if applicable</p> <p>This consideration is particularly relevant to the village of Wickwar which has experienced a large amount of speculative growth, outside of the provisions of the existing Core Strategy and Policies, Sites and Places Plan. 189 houses have been approved in recent years according to the Data and Access Profile for Wickwar, and the vast majority were part of speculative applications. This represents an increase of 30-32% in the housing stock depending on which baseline figure from the Data and Access Profile is used. Such development has not served to enhance infrastructure nor access to services in any meaningful way due to its unplanned nature. Wickwar is currently subject to a further speculative development proposal for 130 houses east of Inglestone Road.</p> <p>Firstly, South Gloucestershire Council must look at the levels of speculative</p>	01 Mar 2021

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	<p>development that have already been accommodated in rural villages, and prioritise for development those villages and settlements which have had limited or no recent development, and where they meet the other criteria. It would not be acceptable to share new development across all rural settlements without taking account of the ‘unplanned’ development which has already been accommodated by communities without consultation or planned improvements to infrastructure.</p> <p>Secondly South Gloucestershire Council must consider the original settlement size before unplanned development, in order to reach a conclusion about what is an acceptable level of small or medium-sized growth for that settlement.</p> <p>Finally, the type of housing that has been provided by unplanned developments must be examined when considering any further development, and specifically which housing needs have not been met. The aspiration set out in the consultation document is that ‘planning for some level of growth can play an important role in making sure that the long term vitality, vibrancy and overall sustainability of our rural communities is maintained by increasing opportunities for home ownership and renting for younger people, families and an increasingly ageing population that want to stay in, or move back to, their communities.’</p> <p>Wickwar Parish Council supports this aspiration and notes that the development which has taken place over the last few years has been substantial in Wickwar with many high-end, large houses. The ability of the local community in particular to afford to obtain such houses is limited, as affordability is an issue. How will the local plan ensure that any further development meets unmet needs and provides truly affordable housing?</p> <p>Consideration 4 - Key sustainability issues – sustainable access to key services and facilities, small and rural schools, and access to superfast broadband Where key services and facilities are not accessible by walking and cycling, they should be within an appropriate distance of a bus stop, served by an appropriate level of public transport services that connect to destinations that offer the remaining key services and facilities For the purposes of this section, an appropriate level of public transport service is considered to be:</p> <ol style="list-style-type: none"> 1. Individual or combined services, total journey time under 1 hour. 2. At least 5 services a day during the week, 3 at weekends, to and from the destination. 3. During the week; one service arriving at the destination before 9am, and one leaving after 5pm <p>Wickwar has very poor provision of infrastructure in terms of local services and facilities, especially given its recent expansion. Any additional level of housing would require additional use of motor vehicles to allow residents to access such services and facilities. This would only exacerbate the volume of traffic and the subsequent knock-on effect of noise pollution and safety issues on the current residents.</p> <p>The isolation of Wickwar with very poor provision of public transport and cycle routes leaves the car as the only viable option which requires a significant number</p>	

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	<p>of trips for shopping, employment and education. How does this address the need to decarbonise transport?</p> <p>The Creating Sustainable Rural Villages and Settlements section of the consultation document claims, incorrectly, that Wickwar has ‘walking and cycling access to a range of services and facilities and, or public transport connections (mostly below 30 minute journeys) to places containing facilities not within walking and cycling distance. On face value, development in these locations could reduce dependency on car journeys.’ In fact a request is still extant for a footpath and cycle path to link Wickwar to Chipping Sodbury which was raised in 2011 under the local transport priority list for South Gloucestershire. Without this being implemented the claim that walking and cycling access to services and facilities is achievable is not a true statement.</p> <p>Wickwar Parish Council strongly contests that Wickwar should be listed alongside Chipping Sodbury, Thornbury and Yate in terms of the ease of access to services. The Data and Access Profile for Wickwar, which is considered by the Parish Council to be accurate with regards to the location of essential services, clearly shows that there is walking and cycling access to a very limited number of facilities. Crucially there is no shop/convenience store or post office in the village, and nor is there one within walking or cycling distance. The Data and Access Profile is not accurate with regards to public transport services in Wickwar – see below.</p> <p>In fact, the consultation document goes on to list a second set of villages with limited walking and cycling access to services and limited public transport, that are more comparable with Wickwar than Yate and Chipping Sodbury. Wickwar Parish Council argues that Wickwar should be included within the second category of settlements described in the consultation document as follows:</p> <p>‘Some of the villages and settlements in this option, such as Engine Common, Falfield, Hawkesbury Upton, Marshfield, Rangeworthy, Severn Beach and Tytherington have walking and cycling access to a limited number of services and facilities. Higher levels of development in these locations would be likely to be dependent on public transport, with most of the current services presenting a journey time of under 30 minutes, but with variations in journey length and number of destinations that can be connected to, which will need to be explored further. Reliance on rural public transport is considered to have a less positive impact on reducing car dependency than development in locations which also have walking and cycling access to a wider range of key services and facilities.’</p> <p>It is also important to point out that, unlike a number of the villages placed in this group, Wickwar does not even have a shop. This means that, exactly like the second list of villages ‘development in these locations would be likely to be dependent on public transport’, and in fact more so because it is not possible to purchase basic necessities without using public transport. The description of the problems with public transport in these villages is also applicable to Wickwar, as is explained below.</p>	

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	<p>Wickwar Parish Council welcomes a definition of ‘an appropriate level of public transport service’ as set out in the consultation document. It is an imperfect definition however, because there is likely to be much variation between public transport provision in villages that meet it. Furthermore, contrary to information provided in the Data and Access Profile for Wickwar and statements made about Wickwar in the consultation document, Wickwar does NOT have an ‘appropriate level of public transport service’ according to the definition.</p> <p>There is a bus service, but the service only runs during the day at 1.5 – 2 hourly intervals and stops at night and on Sunday. Please note therefore that Wickwar does NOT meet the criteria for an ‘appropriate level of public transport service’ specified in the consultation document because there are no services on a Sunday. (The appropriate level is considered to be 3 services a day at the weekend). Also, the Data and Access Profile for Wickwar states that there is a bus service meeting the above criteria to Filton. There is NO service to Filton that meets the criteria. It must be concluded that the existing bus services in Wickwar are not a reliable option for travel and this results in reliance on the car.</p> <p>Finally, as set out above, this consideration makes no specific mention of sustainable access to employment. In relation to Wickwar the issues of Climate change mitigation, Climate change adaptation and resilience and Decarbonising transport are, and will continue to be, significantly impacted by reliance on private cars for commuting. It must be noted that although Wickwar has a bus service to the nearby market town of Yate, this does NOT mean that people commuting for work can use this service to connect with onward services from the railway and bus stations. There are only two buses to Yate that arrive before 9am. The first service leaves at 6:35 and takes 1 hour 15 minutes, making it unsuitable for commuting, and the second, quicker bus, does not arrive until 8:50. This is too late to connect to onward services for employment. Without significant improvements to local bus services and transport connectivity between Wickwar and Yate/ other market towns, any further development will increase reliance on private cars for commuting,</p> <p>5. Key planning designations and considerations;</p> <ul style="list-style-type: none"> • Flood Risk, Areas of Outstanding Natural Beauty, Green Belt • Impact on important ecological, heritage, local landscape assets and character. <p>With regard to consideration 5, Wickwar High Street is designated as a conservation area and is an area of special architectural and historic interest which needs to be preserved. The addition of housing should take this into account so as to preserve this aspect. This need is not clearly enforced in the consultation document.</p> <p>Wickwar is noted as outside the green belt but due consideration should be given to the fact that it is right on the edge of an Area of Outstanding Natural Beauty (AONB) and next to a site of special scientific interest (SSSI) and sites of Nature Conservation Interest (SNCI). This is touched on in the proposal, but the impact of any new development needs to be assessed against the need to minimise the impact</p>	

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	on these areas as a whole. A clear statement for the need to protect and conserve the rural area's distinctive character, beauty, wildlife, landscape, biodiversity and heritage would be beneficial.	
Rebecca Woodward	Flood risk is important but needs to be one consideration combined with engineering that can mitigate. Green land per se needs to be balanced with it's contribution to communities for it's appearance, leisure, wildlife and the environment. Light and noise pollution can impact the environment and wildlife in all green sights. If rural communities have no safe links with neighbouring settlements, they are not suitable for further development.	28 Feb 2021
Redcliffe Homes	<p>Support is given to the identification of a suitable level of housing growth in the rural areas.</p> <p>Those villages within the AONB and Green Belt should only be considered for limited housing growth due to these constraints.</p> <p>There are a range of rural settlements which lie outside of these obligations and not subject to any other constraints i.e. flooding.</p> <p>Settlements such as Cromhall have no such constraints and have had virtually no development over the last 20 years. Cromhall has a range of services which need to be supported with additional residential development. The School has a deficit of pupils and additional residential development would help maintain it. The School would support the development of the land which Redcliffe Homes control.</p>	04 Mar 2021
Redcliffe Homes	Please see enclosed representations.	01 Jun 2021
Redrow Homes (SW)	Please see enclosed representations.	29 Apr 2021
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.	26 Jan 2021
Richard Bull - Environment Agency	<p>Coastal area:</p> <p>With predicted sea level rise as a result of Climate Change over future year's coastal communities, areas between Severn Beach and Sharpness are likely to need to consider impacts on flooding and coastal erosion along the coast.</p> <p>The Environment Agency, Coast Protection Authorities and other Risk management Authorities plan for flood and coastal erosion risk into the future. We create strategies to help us manage current and future risks and these strategies will take account of Climate Change implications. The coming years (up to 2040) will see the potential need to consider flood and coastal erosion risk issues along sections of the Coastline. We welcome the opportunity to work in a more integrated way with the Council on future flood risk projects and strategies relating to risk reduction and the growth agenda.</p>	13 Apr 2021

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	<p>The Agency and the Council need to work together to formulate a plan to protect existing communities' and enable future growth for the area. We would welcome the opportunity to discuss the inclusion of policies and strategies that enables flood defence upgrades within the Plan period for certain areas. This would also apply to many areas along the coast/tidal areas, where we know future improvements are required due to Climate Change and ageing assets.</p> <p>Large areas of SGC are in high tidal flood risk and at risk of tidal breach, proposed development should be aimed at settlements in lower flood risk areas i.e. FZ1.</p> <p>We would like to suggest that reference is made to working with the Environment Agency as we have a Strategic Overview of Flooding under the Flood and Water Management Act.</p>	
Richard Hardy MRTPI - Lansdown Land & Development	<p>4.8. Non-strategic growth in rural settlements would be deliverable in the early period of the New Local Plan and so would address the short-term shortfall of delivering the larger strategic allocations. Carefully planned growth in rural settlements such as Almondsbury can help remove reliance on large urban sites and better cater for the needs and requirements of the District's rural communities.</p> <p>4.9. Page 114 of the document claims that "Benefits of well-planned growth haven't been felt in our rural villages and settlements." These benefits include good quality local housing, new employment opportunities, improved infrastructure, including walking, cycling and Public Transport upgrades and it can also support local services and facilities. This will help ensure the long-term vitality, vibrancy and overall sustainability of rural communities is maintained.</p> <p>4.10. With reference to the care village proposal South of Almondsbury Garden Centre as an example of carefully planned rural growth, it will help retain an increasingly ageing population (an issue faced by many rural communities in South Gloucestershire) that wish to stay in their tight-knit rural community and would otherwise be unable to without the provision of local extra-care facilities. Boosting the supply of homes within the rural settlement will also improve the affordability and choice for local residents.</p> <p>4.11. The employment benefits of planned growth in Almondsbury would also be significant. Local jobs would be created during the construction phase of development and also longer term in connection with the operation of the site. As previously specified, the care village proposal alone would directly support approximately 100 jobs boosting local employment opportunities in Almondsbury.</p> <p>4.12. There would also be some further spending within local shops and businesses by the new population, boosting the local economy.</p> <p>4.13. It is clear that carefully planned growth in South Gloucestershire's rural communities will enhance availability, choice and affordability of homes, whilst simultaneously boosting local jobs and spending within the local economy. Therefore, we consider that the Local Plan 2020 should adopt the principle stated on page 38, whereby "every community should be able to grow in a planned,</p>	11 May 2021

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	<p>sustainable way over the next 10, 15, 20 years and beyond, to help safeguard or improve the long-term vitality and viability of that community.”</p> <p>4.14. The next step in achieving these benefits of planned growth in rural areas, is understanding an appropriate level of growth for that community based on its sustainability.</p> <p>4.47. Unlike Option 1, this route will help meet the “primary consideration” for the new Local Plan 2020 by prioritising growth areas in settlements that have a sufficient level of sustainable travel options to key services and would be able to accommodate non-strategic growth. Therefore, Option 2 is clearly the most environmentally sustainable approach to growth in rural settlements, reducing the overall reliance on private car journeys and subsequently further highways congestion.</p> <p>4.48. As previously mentioned, Option 2 will help ease the pressure on growth in settlements that fall within the Cotswold AONB which are given the highest level of protection due to their national importance.</p> <p>4.49. It is clear that Option 2 will help deliver the homes needed for rural communities across South Gloucestershire. It offers the most environmentally sustainable strategy and has the advantage of being more selective about how much growth and where growth is proposed in the new Local Plan.</p>	
Richard Lloyd	<p>In response to Question 7 I said - “The villages and smaller settlements are an important and valued component of the character and heritage of South Gloucestershire. While small and possibly medium scale organic growth may be acceptable and desirable both in non-Green Belt and Green Belt areas, proportionate in scale to the size of each settlement, I consider that larger scale growth of the villages and smaller settlements should be avoided.”</p> <p>Important points are:</p> <ul style="list-style-type: none"> • Any development in the villages and smaller settlements must prioritise meeting local needs in the communities, particularly for affordable housing and smaller lower cost market housing, together with housing suitable for downsizing. • The scale of development must be strictly proportionate to the size of each settlement and take into account any significant development in recent years. • Other than for small scale growth, any development should be focused on those settlements which are in truly sustainable locations based on the key principle of minimising reliance on the private car. • The need to protect the heritage and individual character of settlements must be respected. • Any proposals to amend the boundary of the Green Belt to accommodate development will be controversial. It will be imperative that South Gloucestershire Council engages thoroughly with the Parish Councils and communities involved and takes into account their views. It is noted that it is the intention to do this. 	03 Mar 2021
Robert Harris - Olveston Parish Council	<p>It is important that rural villages and settlements develop in order to survive. Time cannot stand still or be set in aspic as can be a wished-for tendency in quaint rural settings. However, this is not to say that development can run rampant in our rural</p>	26 Feb 2021

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	<p>communities.</p> <p>Any approved development needs, initially, to be based on the local need which can then be enhanced by ensuring sufficient housing stock etc to fulfil the provision of realistic transport services, shops, schools and other community benefits. This has to be achieved within the context and setting of each individual rural location. It is vitally important that local needs such as ‘starter homes’ and ‘affordable housing’ are prioritised alongside dwellings available for downsizing as the stock of ‘executive housing’ has been well enhanced over several years.</p> <p>In addition, there must be ‘no flirting’ with the flood plain as has happened in other parts of the country and, as previously detailed, must be achieved without significant loss of useable agricultural land.</p> <p>Where such necessary development might require adjustment of the Green Belt in that particular area, then this should be very carefully reviewed taking into account the widest range of views possible from local residents and involving local Parish Councils at every stage.</p> <p>Even after all this every development must be in sympathy with both the heritage and sustainability of the locality.</p> <p>Any development, depending on size, must also be accompanied by improvement in infrastructure. For example, attention should be paid to off road access to shops, schools etc. for walkers and cyclists both within and between villages and settlements.</p>	
Robert Hitchins Ltd	Please see enclosed submission.	01 Jun 2021
Robert Hitchins Ltd and Harrow Estates PLC	<p>Please see enclosed submission.</p> <ol style="list-style-type: none"> 1. The population of a settlement is worth looking at but only as a proxy for other indicators of sustainability such as the existing population; 2. The level of growth in recent years is not in itself considered to be a helpful indicator. The fact that there may not have been much growth in certain areas over recent years (as in the case of Easter Compton) means these locations may well now warrant the need for further new development; 3. The availability of infrastructure is important, and the Plan should look not just at capacity but also the benefits and practicalities of improving these networks (in the case of Easter Compton we would point to the potential for existing and improved Public Transport benefits); 4. Access to supporting services and facilities is very important and existing policy has helped in this respect, however it is also pertinent to look at proximity to higher order facilities and strategic employment provision in particular (the strategic advantages of Easter Compton are set out elsewhere in these representations); 	01 Jun 2021

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	5. It is relevant to consider the designations identified within the consultation document but only in a way that reflects the approach of the NPPF and having regard to the objective of contributing to the achievement of sustainable development (we have set out elsewhere in the approach necessary in respect of the Green Belt).	
Robert Keen - Elms NHW	Take more notice of cycling links - such as yate to Wickwar and Old Sodbury	23 Feb 2021
Robin Perry	See 13.	21 Feb 2021
Robin Winfield	See above. Villages must not be swamped by new development.	19 Feb 2021
Roger Avenin	I believe that in addition to flood risk areas and the Cotswold area we must also protect as much of the green belt as possible.	20 Feb 2021
Roger Hall	See TRAPP'D response.	25 Feb 2021
Rosalyn Pyle	I support the need for housing development on a small scale within villages and around market towns. If well designed and located, they will enhance a neighbourhood and provide accommodation for new generations and existing ones. However, sacrificing the Green Belt is both unacceptable and unsustainable. How can it be argued that such developments would enhance the character and rural identity of the area? Development should only take place around existing market towns and villages where there is already a community to build on.	28 Feb 2021
Roy Irwin	As I have commented earlier scale and pace are important to set out in order to not destroy a village (nor preserve in aspic) This needs to be more clearly articulated.	01 Mar 2021
Ruth Hall - Wessex Water	A number of "rural" South Gloucestershire areas drain to Wessex Water's large sewage treatment works at Avonmouth. Sewage treatment capacity will be available for new development in these areas. The remaining South Gloucestershire rural areas identified drain to small rural sewage treatment works and investment may be required to accommodate potential growth at these smaller works. Foul water capacity assessments considering available sewage treatment can be provided on request to inform site assessment work.	02 Mar 2021
Sam Scott - South Glos Labour Group of Councillors	There is very little detail on what rural sites might look like, whereas lots of detail on urban sites. This is why we cannot answer question 14. The document talks about rural schools with not enough children, meaning these schools aren't sustainable. But if they built more affordable housing in rural areas, there would be more children to attend these schools. Page 124 - very few sites will meet the criteria for walking and cycling distance to key services and facilities.	02 Mar 2021
Sarah Blackmore	We would like to point out some inconsistencies with the Data Access Profiles (DAPs) with regards to Winterbourn and Coalpit Heath. Winterbourne The appraisal states that Winterbourne has 3 Comparison Retail Stores - in fact it	08 Dec 2020

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	<p>has at least 30. Besides those already listed in the appraisal there are the following:</p> <p>Flaxpits Lane:</p> <ul style="list-style-type: none"> Bakery Motor Parts Store Barbers Charity Shop Hairdressers Estate Agents Photography Studio Fish and Chip Shop Cafe Turf Accountants Opticians <p>Park Avenue:</p> <ul style="list-style-type: none"> Hairdressers Beauty Rooms Chinese Takeaway <p>High Street:</p> <ul style="list-style-type: none"> Bicycle Shop Funeral Director Charity Shop Hairdressers and Beauty Salon Estate Agents Car Tyre Depot 2 Indian Restaurants Solicitors <p>Bradley Avenue:</p> <ul style="list-style-type: none"> Barbers Veterinary Practice Chinese Takeway Pizza Takeaway Tatooist Hairdressers <p>Hicks Common Road:</p> <ul style="list-style-type: none"> Winterbourne Auto Centre <p>Down Road:</p> <ul style="list-style-type: none"> Salon 52 beauty salon, <p>In addition to the above there is a community Arts Theatre at Winterbourne International Academy. Also, a community swimming pool and sports fitness facility with hireable facilities e.g. children's soft play. A hockey club, and judo club also run from here.</p> <p>The Winterbourne Community Centre has not been included - this is used daily by community groups and is also open in the evenings with bar facilities.</p> <p>Fromside youth Club and Fromside Gym Club, on the next site have also not been included. They appear to be around the 800 metres boundary.</p> <p>The shopping facilities at the Tesco Express, High Street, are classed as a convenience store. However, Sainsbury's Local on the Badminton Road, Coalpit heath, has been classed as a supermarket. It is claimed that a week's shopping could be bought there. However, I know from experience that this is not the case as there</p>	

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	<p>is a very limited choice and as there are not a great number of deliveries, they are often out of quite simple basics. It has a similar footfall and is a similar size to the Tesco Express in Winterbourne. Therefore the two should be scored in the same way. If Sainsbury's continues to be classed as a supermarket, although it is not large enough to be officially to be classed as one, then the same should apply to Tesco's meaning that Winterbourne has 2 supermarkets.</p> <p>I notice that Winterbourne is not listed as having access to Emersons Green as a Designated Town Centre. However, Coalpit Heath is said to have access. This is rather strange as large parts of Winterbourne are closer to Emersons Green than Coalpit Heath and is within the 5.6 kms specified. In addition, Winterbourne also has access to the centres at Bradley Stoke and Abbey Wood shopping park. I'm not sure if they have omitted the designated town centre section for Winterbourne in error.</p> <p>Coalpit Heath</p> <p>It is claimed there are 'a large number of different types of comparison retail stores'. It states that there are 15 of these but they are just listed as 'various' rather than named individually. All the stores should be identified and named. The Post Office is a Post Office in a local convenience store rather than a dedicated building. The G.P. surgery is a branch surgery from a main surgery in Yate which is only manned part time by one doctor and doesn't include after work appointments. It sometimes closes altogether leaving only the Yate surgery operational.</p> <p>Only one of the 5 primary schools mentioned is accessible. The next nearest is across a very busy main road and does not fall within a safe walking route.</p> <p>It seems odd to base the distances on measurements taken "as the crow flies" as it is totally impractical not accurately measuring the distances people would have to walk or cycle.</p> <p>I notice that in the Strategy section dealing with where growth can go. the green infrastructure table at 4 omits the land opposite Roundways.</p> <p>In Appendix 1 Coalpit Heath is listed in the areas of high flood risk (Zones 2 & 3) but this doesn't show up in the appropriate profile table.</p> <p>The Blackberry Park development off of Park Lane has been included in Frampton Cotterell's DAPs whereas this development is actually with the Coalpit Heath/Westerleigh Parish boundary.</p> <p>Sustainable transport charts:</p> <p>Having looked at these charts it appears that they also suffer from numerous errors. According to the planners, Winterbourne has no buses reaching Bristol City Centre within an hour. This is simply not true. Having looked at the First Bus timetable we note that Winterbourne currently has 25 return buses, all but one is in the light green category of 16 - 30minute journey time. The first return journey bus starts at 5.41 and the last at 22.37.</p> <p>Thornbury is tabled as having no buses to the City Centre/Bus station within an hour. Again, I have checked the First Bus timetable and they have 42 return buses starting at Thornbury Rock Street (there are other stops in Thornbury) and these begin at 5.17 with the last being 22.33. Of these 24 are in the yellow zone (31 - 45 mins) and 18 in the red, 46 mins - 1 hour category.</p>	

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	Coalpit Heath is said to have a service to Filton and has been listed as the yellow 31-45 minute zone. However, having looked at the timetable, the quickest journey is 43 minutes and the longest 1 hour 23 minutes. The majority are around the 57 minute mark and many involve 2 buses (1 also involves a train). Many of them involve a walk of about 15 minutes both to the initial bus stop and another 15 minute walk to the destination. This might be suitable for occasional use but would be unlikely to be used as a daily commute.	
Sarah Blackmore - VALID Action Group	The DAPs and Sustainable Transport Charts need to be thoroughly investigated and checked and verified to ensure they are fit for purpose before they can be used to make any decisions on where housing should be built. We also believe that comparative retail sites should still be included in the DAPs as many services such as opticians, solicitors, restaurants, etc. would entail more car use if these facilities are not present in an area. Public transport often isn't convenient for appointment times for these facilities.	26 Feb 2021
Sarah Hardcastle - Friends of Ridge Wood	<p>We agree it is key to focus growth in locations not completely dependent on private car use, and feel this is not happening currently.</p> <p>We completely agree that new growth in rural areas needs to;</p> <ul style="list-style-type: none"> - consider the size of the existing settlement - consider what development has already occurred there in recent years - consider the suitability of the existing infrastructure to support new housing. If new infrastructure is needed, then there must be a firm commitment to provide this, ideally before further housing development takes place. <p>Ideally we would favour more medium / large scale growth in urban / semi-urban areas than in rural areas of South Gloucestershire. We agree with the identified 1st principle of ensuring access to services by walking / cycling when planning where to site new developments. This is clearly not happening now, as several medium scale new developments have been permitted in rural villages with few facilities. It seems that developers often make weak promises to provide new infrastructure which never materialises, and it is crucial to avoid this going forward. The 6th principle of preserving a sense of place and character is also key - a number of significant sized new developments in rural villages have recently been permitted which are really not in keeping with what is already there.</p> <p>However, if additional housing in rural areas is truly needed, then having read this document we would agree that both green belt and non-green belt settlements should be considered in the first instance to avoid placing too much pressure on villages outside the designated green belt which still have unique character and heritage.</p>	28 Feb 2021
Sean and Jacqueline Rinaldi	We don't see any opportunity for large scale development in the rural villages and settlements but have no objection in principle to small scale development that is appropriate to the needs of the village or settlement itself.	26 Mar 2021
Simon Fitton - YTL Developments (UK) Ltd	N/A.	16 Mar 2021

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Simon Moore	There should only be growth of our villages and settlements if this does not encroach on agricultural land. Only development of existing developed sites should be considered.	28 Feb 2021
Simon Steele-Perkins - Waddeton Park Limited	<p>Whilst we have no specific interest in ‘rural villages and settlements’ (in this submission, though other submissions by WPL address the matter), any tendency to bundle together such as AONBs and areas designated as Green Belt would be deeply misleading.</p> <p>As a general point on the consultation overall, we do not think that the consultation document is correct in its presentation of the relevance of Green Belt policy, nor sufficiently direct in saying that a change to Green Belt is desirable and inevitable in creating a proper and appropriate Spatial Strategy for South Gloucestershire.</p>	06 May 2021
Sophie Spencer - CPRE Avon and Bristol [South Gloucestershire District]	<p>South Gloucs has not and is not giving due weight to protecting the Green Belt and to a lesser extent the AONB. As stated in our earlier answers it sees the Green Belt as a readily available resource. Not one of its many previous plans, or those of Avon and Northavon before it, curtailed urban sprawl.</p> <p>Are windfalls excluded from the definition of sites of less than one hectare? One tenth of the calculated annual need is 140; although successive AMRs speculate that 210 dwellings per annum of windfalls is an appropriate number, many more have been built in every year since 2006. Over 15 years one can expect in this category alone, 1,000 more dwellings than projected.</p> <p>What does the inclusion of the key considerations on Page 122 imply or put another way, what has changed in their relevance that will make ignoring them any less likely? Places like Charfield and Wickwar have had grossly inappropriate levels of speculative development with no increase in facilities or effective transport infrastructure, indeed there has been a decline. Planners and councillors have accepted assurances or imagined increased bus usage and investment in infrastructure, ignoring that overcoming the lack of facilities and the distance to hospitals and secondary education takes time. Will that be considered as supporting more growth to justify trust in future speculative facilities, when really it is evidence of failure?</p> <p>Hospitals are missing from the services on Page 124.</p> <p>The reference on page 132 to working with neighbouring authorities who have non-Green Belt land that could potentially be considered for development can only mean Gloucestershire and Wiltshire because North Somerset and BANES have even higher proportions of protected land. If either county is planning to service employment areas in S Gloucs then this reduces S Glouc’s need but increases emissions.</p> <p>Rural villages are often lacking in affordable homes, as urban areas are. Priority for any new homes in rural villages and settlements must be for those that are truly affordable, well designed, and sensitively located.</p>	02 Mar 2021
South West Housing	Referring to the two options for investigating the Green Belt as shown on page 132, we show support for Option 2 as it provides the broadest range of options for future	14 May 2021

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Association Planning Consortium (HAPC)	development as it considers a larger number of villages and settlements to deliver the homes needed for communities across South Gloucestershire.	
South West Strategic Developments (SWSD)	<p>Please see enclosed representations.</p> <p>8.18 We agree with the proposed approach to flood risk and AONBs, however for the reasons we have set out we consider that a thorough review of the Green Belt should be undertaken, and land allocated on the edge of Bristol as part of the Local Plan.</p> <p>8.19 The JSP correctly identified that it would not be achievable to deliver all of the homes required outside of the Green Belt without significantly compromising other sustainability objectives, namely reducing the need to travel. As the number of homes has increased even further across the WECA, which will result in Bristol's need overspilling into South Gloucestershire, it is now even more imperative that the Green Belt is reviewed and land allocated where demand is greatest.</p> <p>Do you have any comments on our proposed approach to investigate an appropriate level of growth in our rural villages and settlements?</p> <p>8.20 We wholly support investigations into rural villages and settlements so that a modest level of growth can be allocated here to sustain existing facilities and services. Please refer to our other representations for a more detailed assessment of this issue.</p>	31 Mar 2021
Spitfire Bespoke Homes Ltd	<p>Where should we investigate for growth in our rural areas:</p> <p>3.27. The consultation document sets out locations within which development could potentially occur over the Plan period in the rural communities. These are:</p> <ul style="list-style-type: none"> • in and around all villages and settlements with a defined settlement boundary, or, recognised collections of dwellings, and areas around the edges of market towns; and • areas where sites have been identified through previous Calls for Sites, up to 200 metres from the edges of urban areas. <p>3.28. Spitfire is pleased to see that the emerging Local Plan looks to take a pragmatic approach to investigating the potential to support small and medium-scale growth in the rural villages and settlements and agrees with the above approach set out in the consultation document.</p> <p>3.29. As the consultation document identifies, the majority of growth within South Gloucestershire has previously been focussed on the communities of the Bristol North and East Fringes, and the market towns of Yate, Chipping Sodbury and Thornbury. This has had consequences for investment in the rural settlements and villages over recent years. This is also despite villages such as Winterbourne, being situated in sustainable locations that are accessible by sustainable modes of</p>	21 Apr 2021

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	<p>transport to everyday services and facilities and that are not severely restricted by notable environmental constraints.</p> <p>3.30. As set out earlier, the NPPF clearly acknowledges the benefits of sustainable development in rural areas and it is vital that the new Local Plan seeks to ensure that opportunities for villages and smaller rural settlements to grow and thrive are facilitated over the Plan period.</p> <p>3.31. Overall, Spitfire is therefore fully supportive of the approach to reviewing the potential for new development at all of the rural villages and settlements unless there are significant environmental or sustainability constraints. As set out further below, it is considered that the review must also include settlements and villages currently situated within the Green Belt.</p> <p>Investigating ‘appropriate’ small and medium-scale growth:</p> <p>3.32. The consultation document suggests the key considerations to help determine appropriate levels of growth in individual villages and settlements will include:</p> <ol style="list-style-type: none"> 1. the size of existing village and settlements – relating to populations and the number of existing homes; 2. The level of planned and speculative growth that has been built or approved in individual communities in recent years, if applicable. <p>3.33. Spitfire is generally supportive of the approach to determining levels of growth, as set out above, it is agreed that the site identification process should involve a capacity-based assessment at each settlement. It is evident that capacity constraints to some settlements could result in risks the new development strategy does not deliver the necessary quantum of overall housing growth.</p> <p>3.34. It is clear that growth in many of the rural villages and settlements has been generally constrained and limited. To illustrate this point as far as Winterbourne is concerned, which is regarded as one of the more sustainable rural villages, it is noted that the Data and Access Profile for Winterbourne identifies that between 2011 and 2018, Winterbourne’s population has actually decreased by 1%. This is, for example, in contrast to nearby Frampton Cotterell which has seen a 4% increase in its population.</p> <p>3.35. Likewise, since 2011 Winterbourne has seen the completion of just 43 additional dwellings, representing a 1.7% increase in households, plus a further 36 dwellings with permission that have yet to be developed. On the other hand, for example, Frampton Cotterell has seen an increase of 297 additional dwellings since 2011, representing a 12.8% increase in households and in addition a further 293 dwellings with permission that are still to be developed. The provision of additional housing in Winterbourne, including affordable housing, will clearly therefore assist in ensuring that the NPPF’s aim of achieving mixed and balanced communities is achieved.</p>	

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	<p>3.36. It is also agreed that the suitability and capacity of existing infrastructure and, any potential requirement for new utilities infrastructure – especially sewerage, water, power and gas should be carefully considered when determining where non-strategic growth should occur in the rural settlements and villages. It remains important to ensure that new development is not all dependant on significant levels of infrastructure coming forward as this can often cause significant delays to development proposals, causing a knock-on effect to maintain a robust 5YHLS.</p> <p>3.37. Sustainable access to services and facilities and their ability to accommodate future demand is also an important consideration in deciding where future growth is to be located. We are pleased to note that one of those factors includes whether there is access to superfast Broadband. This is a key consideration now more than ever, as many people are working from home and may continue to do so for the future. In this regard, we would reiterate that Winterbourne is one such village that already has access to superfast Broadband. On the other hand, nearby Frampton Cotterell and Coalpit Heath, for example, do not have superfast Broadband available presently.</p> <p>3.38. Two potential options for exploring potential growth in the rural communities are also set out in respect of Green Belt land. These are:</p> <ol style="list-style-type: none"> 1. Only investigate the potential for an appropriate level of small to medium-scale growth in villages and settlements outside of the Green Belt; 2. Investigate the potential for an appropriate level of small to medium-scale growth in villages and settlements both outside and inside the Green Belt. <p>3.39. Spitfire is fully supportive of Option 2 (reviewing settlements both outside and inside the Green Belt. As the consultation document acknowledges, this would result in the largest number of villages and settlements being considered and providing the broadest range of possible options to deliver the homes needed for communities across South Gloucestershire, also potentially meaning lower overall increases in settlement size. By prioritising the protection of the Green Belt over other issues (Option 1) this could also lead to unsustainable patterns of development occurring.</p> <p>3.40. As highlighted previously, given that much of South Gloucestershire is covered by the Green Belt designation, and many of the areas outside of the Green Belt are covered by the AONB, it is important to assess all possible options. It should also be acknowledged that removing land from the Green Belt can also be offset through compensatory improvements to the environmental quality and the accessibility of remaining Green Belt land as well as providing improvements to GI provision.</p> <p>3.41. Indeed, we note that the initial Phase 1 Sustainability Appraisal (SA) work which will form part of the evidence base to the new Local Plan identifies at paragraph 4.115:</p> <p>“... By including some small scale development at sites within the Green Belt</p>	

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	<p>close to the urban area of the District, a proportion of new residents could have particularly good access to the wider range of services and facilities at these locations. This would potentially strengthen the positive effects recorded. Furthermore, development within the Green Belt could allow for new residents to benefit from infrastructure improvements or new services where these settlements are close enough together to support a relatively high level of development overall to allow for new provisions. This could be the case at settlements such as Winterbourne, Frampton Cotterell and Coalpit Heath given their close proximity. Minor negative effects are identified in combination for SA objectives 1a, 2d and 3c/3d/3e considering that this option would include locations at which connectivity is substantially more limited, including Elberton, Dyrham, Hinton and Oldbury-on-Severn” (our emphasis).</p> <p>3.42. As acknowledged in the Phase 1 SA work, Winterbourne is one such settlement where non-strategic growth could take place, but which is currently constrained by the Green Belt. Winterbourne is evidently a suitable and sustainable location for some new development and the Land off Bristol Road, specifically, as it has existing recognisable and robust boundaries as well as abutting the current settlement edge. As set out in the accompanying Green Belt Assessment work, the land off Bristol Road, Winterbourne has a restricted physical and visual footprint and is considered to provide a limited contribution to the openness and purposes of the Green Belt.</p> <p>3.43. Further, we note that the SA recommends at paragraph 4.126 that in preparing subsequent stages of the Local Plan the Council should consider a Spatial Strategy that includes a combination of villages and settlements within and outside the Green Belt as Option 2 performs better than Option 1 in sustainability terms.</p> <p>3.44. Through Option 2, settlements such as Winterbourne can be considered where there is clearly strong potential for development to have walking and cycling access to a wider range of key services and facilities as well as benefiting from Public Transport links. The SA also identifies that Option 2 is expected to have more substantial benefits in terms of reducing car dependency as well as also having the benefit of limiting the potential for adverse impacts on the AONB and its setting.</p>	
St. Modwen Developments and The Tortworth Estate	<p>We support the sustainable growth of the rural economy through new development in appropriate locations, consistent with NPPF paragraph 78.</p> <p>We acknowledge that any potential locations for large scale growth will be set out in the Council’s Phase 2 document so will reserve the opportunity to make further representations at the appropriate juncture. However, we would like to take this opportunity to highlight the need for such developments, as well as smaller scale rural growth, to meet increased development needs, foster rural regeneration and economic growth in appropriate locations without oversaturating existing communities.</p> <p>We note that Buckover is not included on the rural settlements map included in the Phase 1 consultation and would like to emphasise that it is an appropriate and sustainable location for large scale development. We have demonstrated in our Call for Sites Submission that the development can be brought forward as it is not</p>	05 Mar 2021

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	impacted upon by any of the potential constraints which are identified within the consultation Plan (page 126+).	
Stephen Hickmans	I agree all places of outstanding beauty and wildlife habitat should be preserved in its natural form and not be recreated through development.	26 Jan 2021
Steven Freke	Town development that encroaches on flood risk areas will inevitably put pressure on the water system and result in secondary flooding in surrounding villages and hamlets. This is already happening northwest of Thornbury. Protecting the countryside between Thornbury and the Severn estuary is essential to the character of the area, reduces flood risk, protects wildlife habitats and enhances the well being of people taking recreation in the area. In reality sustainable villages are almost impossible to achieve unless you can provide non car related transport options.	27 Feb 2021
Steve Seward	Many of the listed rural villages are unfortunately no longer rural villages but sprawling housing estates, towns verging on cities and industrial zones. It is evident from the development pressures around Pucklechurch for example that planning decisions are influenced by cost and profit drivers. With the recent construction of multiple warehouses and housing developments on land which was previously open spaces available to village residents, and the proposed over development of the local pub in the centre of the village it is clear that the ambience of this rural village is now under huge risk along with increased crime and drug incidences. There is a huge risk that the sustainability considerations of all rural villages will quickly change to the sustainability considerations of a concrete jungle. Lyde Green is a good example of a poorly designed highly populated development that would dissolve the rural historic village of Pucklechurch if a continued expansion encroaches its Green Belt borders	13 Feb 2021
Strongvox Homes	5.12 We support the principle of seeking to ensure that development at the rural villages is Plan-led in light of the level of speculative development that has come forward at them in recent years. 5.13 Whilst strategic levels of development will be required to sustainably meet the bulk of the Council's housing requirement, development at villages where large-scale development is not possible will still be required to support the vitality and viability of those settlements and address affordability issues. 5.14 In terms of the approach to investigating the appropriate levels of growth that should come forward at the rural villages, the two options are appropriate starting points and will need to be subject to an appropriate Sustainability Appraisal to establish which should ultimately be pursued. The approach may then need to be refined in terms of identifying which rural settlements in the Green Belt should be prioritised based on the application of the guiding principles outlined within the consultation document.	11 May 2021
Sue Green - Home Builders Federation	The Council's growth strategy should meet the housing needs of both urban and rural communities. As set out in the 2019 NPPF "to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support	05 Mar 2021

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	<p>local services” (para 78). Unless there are significant constraints or sustainability issues, all rural villages & settlements should be considered for appropriate levels of sustainable growth for homes and jobs.</p> <p>As set out in 2019 NPPF, where fully evidenced and justified Green Belt boundaries can be altered in “exceptional circumstances” through the preparation or updating of Local Plans (paras 136 & 137). Therefore, the potential for small to medium-scale growth in villages and settlements both in & outside the Green Belt should be investigated.</p>	
Sue Hope	<p>Would like to see the Cotswolds National Landscape given priority protection. Hawkesbury Upton has planning permission granted for houses which have yet to be built out. This should be considered as the community’s contribution to the housing figures for the future Local Plan.</p>	26 Feb 2021
Sue Simmons - Westerleigh Parish Council	<p>The Planning Considerations for Green Belt on pages 132 – 135 are fine if they are actually used in reality, and work in relation to future Planning Applications made.</p> <p>Again in relation to issues 27 & 28 Housing Needs, Rural Exception Schemes and Local Connection Schemes should be implemented and local should mean local.</p> <p>Key Sustainability factors should be honest, accurate, current, logical.</p>	23 Feb 2021
Susan Smith	No	16 Feb 2021
Swanmoor Stoke Ltd	<p>Question 14:</p> <p>There are some areas of national policy, as set out in the accompanying Representations, that should be considered as written in the NPPF. For example, the application of the sequential approach to development in areas of flood risk is a matter which should be applied having regard to the wider objectives of the Plan. It does not preclude development in such areas which is recognised, but not fully. The approach should not necessarily be limited to specific communities, but to the spatial objectives of the Plan as a whole. This is relevant to consideration of areas such as Severnside.</p>	06 Apr 2021
Taylor Wimpey UK Ltd - Land at Vilner Farm	<p>This section of the document seeks views on growth options for small settlements and rural areas. Of note is the consideration of Green Belt as a criteria for determining whether or not a rural settlement should be considered for any level of growth. It is unclear why there is a separate consideration of the need to release Green Belt land under this section of the document, where this is already set out at the end of the ‘Building Blocks’ in Section 5. At this stage it is too soon to curtail all further investigation for potential growth at smaller settlements in the Green Belt. The level of growth (to be defined following progression of the SDS) and the Spatial Strategy options need to be worked on further before it can be appropriate to take any development option off the table. This is necessary to ensure that any Green Belt review (an essential component of the Plan making process in South Gloucestershire) is well evidenced and robust overall.</p>	20 Apr 2021
The Badminton Estate	Please see accompanying representation.	04 May 2021

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	<p>5.1. As a principle, it is encouraging to see the Council have dedicated a detailed section of the Phase 1 consultation toward achieving sustainable rural villages and settlements. The issues identified within this section are reflective of the key issues considered above, including the difficulties in the lack of provision of affordable housing to help meet the requirements of different groups within the District, including housing for both the elderly and the younger populations, as well as the lack of employment opportunities and vitality of local services and facilities.</p> <p>5.2. As identified above, the Council are seeking to provide growth opportunities on small, medium and larger sites which we consider a comprehensive and positive strategy in helping to achieve sustainable growth within rural settlements. We note that the Phase 1 consultation document is not an opportunity to discuss specific site allocations and that this will be considered in Autumn 2021 following the completion of the Housing and Economic Land Availability Assessment (HELAA). However, at this point it is worth highlighting to the Council that Ridge and Partners LLP on behalf of the Badminton Estate submitted a number of representations to the Council’s Call for Sites consultation in October 2020 for residential, employment and retail uses which will be assessed as part of the emerging HELAA. The sites are of small to medium scale adjoining existing rural settlements with the potential to support and in some instances offer local services and facilities; reflective of the Council’s emerging Spatial Strategy. In particular the emerging LP considers locations “in and around all villages and settlements with a defined settlement boundary, or recognised collections of dwellings, and areas around the edges of market towns” and “areas where sites have been identified through previous Call for Sites, up to 200 meters from the edges of urban areas” as appropriate areas for development. With regard to the former, a number of ‘rural settlements and villages’ are then listed which includes settlements to which the Estate own land within, including Acton Turville, Badminton, Tormarton and West Littleton. It should be noted that the representations submitted as part of the Call for Sites consultation contained sites surrounding these settlements and therefore align with the Council’s emerging Plan in identifying suitable locations for rural development.</p> <p>Sustainability and Accessibility:</p> <p>5.3. The consultation document then asks “Are all these locations sustainable and appropriate for investigation for planned growth?” and considers similar guiding principles as set out above to help address this, focusing on the size of existing settlements, reviewing any planned growth of those settlements over the years, and placing an emphasis on how sustainable those locations are in terms of their accessibility to a range of services and facilities via sustainable modes of transport. To determine what settlements are considered ‘sustainable’ locations for development, the Council has prepared Data & Access Profiles (DAPs) on each settlement reflective of data from November 2020. The DAPs provide factual information on each settlement of the District including the range of services and facilities contained within them.</p> <p>5.4. Whilst we have no comments toward the methodology used to formulate the DAPs, it is vital that the use of the DAPs should not be used to disregard</p>	

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	<p>development located in settlements which either are not within walking or cycling distances to the majority of ‘key services’ as defined within the emerging LP, or where they do not contain a bus service that occurs above every hour[1]. Villages by their very nature are sustainable locations and will also support rural employment, services and facilities either within their boundaries or the facilities of surrounding settlements. Proportionate, well planned and well designed growth in smaller communities should therefore be accommodated alongside the DAPs methodology to ensure that all settlements can grow sustainably into the future. If the Council were to deprive rural communities of some growth then a number of settlements in the District will become more deprived, resulting in even less sustainable locations, imbalanced communities and further reliance on the private vehicle. As well as impacting upon the inequalities of society this will also harm the ability for the Council to reach a zero net Carbon future.</p> <p>5.5. The Council should use the DAPs to identify the amount of growth suitable for each of the rural villages and give substantial weight to proposals that would either conserve and enhance existing services and facilities within those settlements, or provide additional services and facilities and employment opportunities to increase the self-sufficiency of rural areas, a key aim of the NPPF. Equally the DAPs should give weight to community cohesion and social sustainability in addition to locational proximity to shops, services and facilities.</p> <p>[1] A parameter used within the DAPs to establish whether settlements have ‘good’ access to services and facilities via public modes of transport.</p> <p>Environmental Designations and Constraints:</p> <p>5.6. Given the rural context of these areas consideration of sites located in the AONB, the Green Belt and areas of Flood Risk is also taken into account, as well as any impacts such proposals would have on ecology, heritage assets and local landscape character. The Estate fully support the importance of ensuring these material considerations are considered and given appropriate weight so the natural and historic landscape is conserved and enhanced, particularly given that the majority of their land sits within the Cotswold AONB and that the Estate itself owns and protects a number of heritage assets, among those of which includes the Grade I Listed Badminton Estate Registered Park and Garden and Badminton House.</p> <p>5.7. The emerging LP should not seek to protect these designated areas through restricting development but rather adopt an approach that seeks to conserve and enhance these environmental assets, securing their preservation for the future. In terms of the AONB, whilst the NPPF contains Paragraph 172 which limits development to be of small-scale in these areas, unless exceptional circumstances apply, this should not be used as a blanket policy to rebut development in these areas. Conversely, planning policy should embrace proportionate development in the AONB that has the potential to enhance these areas with good design. As recognised by the Council, the lack of growth can cause social and economic deprivation with higher affordability costs and lack of employment opportunities. It is refreshing to see the Council identify this as an issue within the consultation</p>	

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	<p>document.</p> <p>5.8. We consider there is ample opportunity to achieve sustainable development within or adjoining settlements in the AONB that contain an adequate level of services and facilities and access to Public Transport without having an adverse impact upon its special landscape qualities and characteristics. It should be recognised that the settlements within the AONB are part of its intrinsic character and beauty and therefore some development should have the potential to sit comfortably within this environment. This supports our request for the Council to use the DAPs in an appropriate manner to help inform the level of growth in rural areas.</p> <p>5.9. Notwithstanding the above, we note that the Council, as part of their proposed development strategy, are exploring the opportunity to release land from the Green Belt to help deliver growth within rural areas, given the majority of settlements within closer proximity to larger settlements are located in the Green Belt. As above, we do not disagree with this proposed strategy. However, it is noted that the Council, in deciding whether land should be released from the Green Belt, provide alternative scenarios:</p> <ol style="list-style-type: none"> 1. “Only investigate the potential for an appropriate level of small to medium-scale growth in villages and settlements outside of the Green Belt; or 2. Investigate the potential for an appropriate level of small to medium-scale growth in villages and settlements both outside and inside the Green Belt.” <p>5.10. Appendix 1 of the consultation document sets out a pros and cons list of each scenario. Rather than commenting on the approach taken, which is supportive of development in locations of interest to the Estate (i.e. outside the Green Belt), Appendix 1 defines the settlements of Acton Turville, Badminton, Tormarton and West Littleton as having “minimum level of sustainable Public Transport links and very limited cycling and walking access to key services and facilities.” Notwithstanding the negative tone this presents toward the sustainability of these settlements, the Council identifies that avoiding development at these locations without releasing land from the Green Belt will increase pressure on other areas of the District to accommodate the level of growth required for the District. As such, the Council favours Option 2 which enables the distribution of growth outside and within the Green Belt (or otherwise releasing land from the Green Belt).</p> <p>5.11. With this in mind, it is important to ensure that as the emerging LP gathers momentum that the proposed development strategy does not restrict rural development to sites that are currently in the Green Belt, avoiding development in the AONB. This would isolate existing communities in the AONB, including the populations of Acton Turville, Badminton, Tormarton and West Littleton, resulting in an influx of social and economic deprivation. Moreover, the growth in rural areas would not be evenly distributed, resulting in part of the District where the AONB sits outside the Green Belt to become unsustainable.</p>	
Theodore Butt Philip - South	Insufficient focus is given to how we can help existing rural communities to become sustainable and to enable those already deemed sustainable to retain their	12 Mar 2021

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Gloucestershire Liberal Democrat Council Group	<p>sustainability or become more sustainable.</p> <p>In recent decades smaller more rural communities have been under threat from reduced services (public and private), reduced local employment and reduced transport (bus) services.</p> <p>This is a trend which we do not welcome and we reject the development of a plan which gives insufficient weight to reversing these trends. Rather than accepting that some places are unsustainable, we must seek to ensure everywhere becomes more sustainable.</p>	
The Tortworth Estate	<p>We support the sustainable growth of the rural economy through new development in appropriate locations, consistent with NPPF paragraph 78. This will help to meet increased development needs in a balanced way, helping to foster rural regeneration and economic growth in appropriate locations without oversaturating existing communities. As noted elsewhere in this Submission, we understand improving rural vitality is a priority of the current Administration; the Local Plan 2020 is a key vehicle for achieving this and growth should be planned for accordingly.</p> <p>As referred to in the Call For Sites Submissions, has a number of small-scale land interests at rural settlements including Wickwar, Charfield and Cromhall and is therefore well-positioned to play a key role in delivering sustainable, balanced growth across rural areas in the North of the District. These villages also benefit from being outside the Green Belt, removing a significant barrier to new development.</p> <p>Being a legacy landowner, it is in the interest of the Estate to deliver high quality development that is of real benefit so as to foster and maintain successful communities and economic vitality in these rural locations. The Estate also benefits from having existing relationships, such as with education and healthcare trusts/providers, which can help facilitate the delivery of infrastructure necessary to support growth.</p> <p>In particular, the Estate owns several potential development sites at Cromhall that could be allocated to deliver a mix of residential, employment and community uses. This allows for a proactive and comprehensive approach to be taken towards the phased growth of the village, rather than a reactive, piecemeal approach. This managed approach also allows for any necessary community infrastructure to be planned for in parallel with future growth, and the requisite funding allocated through CIL or other means, thus being able to accommodate future growth more successfully.</p>	05 Mar 2021
Tom Cotton - Road Haulage Association	No comment.	01 Mar 2021
Tony Kerr	<p>There shouldn't be any development in areas of identified flood risk.</p> <p>How will you determine the size of a rural village which protects its character?</p>	17 Feb 2021
Top To Bottom Ltd and Hanham	See attached representations.	11 May 2021

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Community Trust	<p>Allocating development within and adjacent to rural sustainable villages is crucial to efficient delivery of housing across the District and to ensuring that the sustainability and vitality of our rural communities are enhanced. In adopting a ‘planned growth’ approach, development can respond each rural settlement’s identified needs and ensure that the right support is provided to communities alongside the correct scale, form, mix and design of new development. The selection of such locations for development needs to be based on a thorough understanding of a broad range of material considerations. Many of those are identified in the Council’s issues and priorities document. These include heritage assets, including Conservation Areas, Listed Buildings and sites of archaeological value. There are also landscape features like valleys, hillsides and escarpments, all of which help to create valuable, historic landscapes and distinctive places.</p> <p>It is considered that the first option to only investigate locations outside of GB would not be sound as it would require a number of less sustainable settlements outside of the Green Belt to deliver to deliver a substantial proportion of the housing requirement. Furthermore, it is highly likely that South Gloucestershire will be expected to assist meeting a proportion of unmet housing needs arising from Bristol City, and therefore it would not be sound or sustainable to simply deliver these in locations that are beyond the Green Belt and highly detached from the urban area. It is considered that unmet housing needs should be met at or close to where they arise, i.e. near to Bristol. This is supported by paragraph 138 of the NPPF is clear that the need to promote sustainable development should be taken into account when reviewing Green Belt boundaries.</p> <p>A balancing exercise in understanding all of these issues, followed by an allocation of a mix of sites is the correct approach to determining the Spatial Strategy. Our client fully supports the review of settlements both within and outside of the Green Belt (Appendix 1: Option 2). The SA states in Paragraph 4.126 that:</p> <p>“In preparing subsequent stages of the Local Plan, the Council should consider a Spatial Strategy that includes a combination of villages and settlements within and outside the Green Belt. Option 2 performs better than Option 1 in sustainability terms, given its potential to provide residents with access to a wider range of services and facilities within the existing urban area.”</p>	
Trevor James	Green Belts should be extended and all green fields plus hedgerows/trees protected.	26 Feb 2021
Tristan Clark - South Gloucestershire Council	<p>Large scale development in existing rural villages and settlements should be entirely ruled out on the grounds that it would evidently be harmful to their present character and would be demonstrably unsustainable in terms of transportation and services.</p> <p>South Gloucestershire Council, when considering locations for growth, needs to adopt a sequential approach. Brownfield sites outside of the Green Belt should be considered first, followed by brownfield sites that are washed over by Green Belt, then by greenfield sites outside of the Green Belt, before ultimately considering greenfield sites within the Green Belt. Revisions to the Green Belt must be undertaken only as a last resort. The Green Belt between the northern and eastern</p>	01 Mar 2021

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	<p>fringes of Bristol and Yate is particularly at risk. There is a high risk that the parishes of Westerleigh, Frampton Cotterell, Iron Acton, Rangeworthy and Winterbourne could be gradually enveloped by the outward expansion of the suburbs of Bristol and Yate.</p> <p>The planning policy for Rural Housing Exception Sites (CS19) should be reviewed and enhanced. South Gloucestershire Council should reach out to rural parishes about undertaking housing needs surveys in their areas before Phase 2 of the Local Plan is published. Wherever possible Rural Housing Exception Sites should be promoted to meet demonstrable housing need in rural settlements. This will allow rural parishes to shape their own development, resist speculative planning applications in the future and build homes for residents with a historic link to their settlements. Exception sites should be advanced to cater for residents with historic links to these settlements who are forced to move away due to a lack of affordable housing.</p>	
Trystan Mabbitt - Hanson UK - Heidelberg Cement Group	With the Guiding Principles referred to above firmly in mind, it is considered that some market town extensions are capable of delivering highly sustainable and medium and even strategic scale housing, employment or mixed use growth. An open mind should be kept at this early consultation stage of the Local Plan's preparation.	18 Mar 2021
Victoria Bailey - Oldbury on Severn Parish Council	<p>Growth in Rural Villages and Settlements needs to be Plan Led. The objective of investigating to gain and understanding needs and aspirations of communities in flood risk areas is very important.</p> <p>Given the age of the current SFRA2 and the Shore Management Review there is a need to bring these up to date incorporating current understandings of Climate Change and current policies and standards. These documents should be carefully co-ordinated to reflect a common understanding and prediction which does not currently appear to be the case. A clear stance should be made by the LLFA on what works are to be undertaken to protect villages and infrastructure from flooding and when this is to be undertaken and to what standard (see also the response to Question 3 and Appendix A attached).</p>	24 Mar 2021
Vistry Group	<p>Please refer to enclosed representations.</p> <p>Section 7: Creating Sustainable Rural Villages and Settlements:</p> <p>Do you have any comments on our proposed approach to investigate an appropriate level of growth in our rural villages and settlements?</p> <p>It is noted that Thornbury is listed in Section 7 as a 'Rural Village and Settlement' and is identified on p.121 as a 'market town that is being investigated for small/medium scale growth' (alongside Yate and Chipping Sodbury). It should be recognised, however, that the role of the market towns differs markedly from the District's villages and hamlets – Thornbury, for example, is recognised as a town that serves a function in supporting the population of surrounding rural areas through the availability of services and facilities within the town centre with Public Transport links to major employment areas (Aztec West), retail (Cribbs Causeway) and urban conurbations (Bristol City). Thornbury should not, therefore, be assessed</p>	06 May 2021

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	<p>on a ‘level playing field’ alongside the District’s villages and hamlets as it clearly has a much greater role to play in the settlement hierarchy. Growth at Thornbury should not be limited to ‘small/medium scale growth’ - a greater level of growth should be directed to the Thornbury so that it can continue to thrive and serve the rural hinterlands.</p> <p>It is agreed that the Council should be exploring growth options on the edge of the Market Towns. Land around the Northern and Eastern edges of Thornbury is not constrained by the setting of the town’s Conservation Area and lies outside of the Green Belt. The evidence prepared by the Council confirms that Thornbury can offer sustainable access to a range of services and facilities, and due to the relatively large number and range of key services and facilities available within Thornbury, it acts as a destination for accessing town centre retail, GP and health facilities, and Library services that are lacking in surrounding villages and settlements in South Gloucestershire. This is consistent with earlier evidence base documents which conclude that Thornbury is the most sustainable non-Green Belt settlement in the District. The town’s Northern and Eastern edges were identified within the Joint Spatial Plan as appropriate locations for strategic growth. These principles remain unchanged, notwithstanding withdrawal of the JSP from Examination in early 2020. This is reiterated further by virtue of the Council continuing to favourably consider major housing developments on the edge of Thornbury (most recently Application ref. P19/8659/O). When determining the Appeal for land South of Gloucester Road Inspector Baird confirmed that the scheme would provide residents with a comprehensive range of appropriate and realistic travel options to access key services and facilities by sustainable transport modes, including reasonable and acceptable walking/cycling routes. He confirmed that the proposal would not be car dependent or encourage unsustainable travel behaviour.</p> <p>In determining an appropriate level of growth, the Consultation Document refers to ‘key considerations’ on p.12. It is agreed that sustainability factors (such as accessibility) and environmental considerations (such as flood risk, AONB and Biodiversity designations) should influence the level of growth at a particular settlement – this will form part of the assessment undertaken as part of the Sustainability Appraisal to ensure that the optimum strategy is chosen having regard to reasonable alternative. With regard to the first two ‘key considerations,’ it is unclear why the size of the existing settlement or the level of planned and speculative growth would be determining factors. While the size of the settlement is likely to come hand in hand with the availability of services and facilities, settlement size and existing commitments should not be a constraint on future expansion, provided sustainability objectives can be met and population increases can be supported by provision of enhanced infrastructure.</p>	
Waddeton Park Ltd	The Council’s growth strategy should meet the housing needs of both urban and rural communities. As set out in the 2019 NPPF “to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services” (para 78).	11 Mar 2021

Respondent Name	User Response: Text	Response Created
	<p>Unless there are significant constraints or sustainability issues, all rural villages & settlements should be considered for appropriate levels of sustainable growth for homes and jobs.</p> <p>As set out in 2019 NPPF, where fully evidenced and justified Green Belt boundaries can be altered in “exceptional circumstances” through the preparation or updating of Local Plans (paras 136 & 137). Therefore, the potential for small to medium-scale growth in villages and settlements both in & outside the Green Belt should be investigated.</p> <p>Indeed, many of the most suitable locations for new sustainable development will, by definition, be located within the Green Belt. This is because for many years Green Belt designations have been used to push new housing development towards inherently less sustainable locations. This approach cannot continue to prevail if the current significant challenges relating to the undersupply of much-needed homes are to be robustly addressed.</p> <p>If the right number of homes in the right places are to be delivered, then all options need to be explored to ensure that development is positively planned for. If current Green Belt locations are not considered, then the options for the distribution of the significant housing numbers required become limited and the current patterns of activity that fuel adverse Climate Change impacts will continue, contrary to stated Local Plan objectives.</p> <p>The need to deliver homes closer to where people work and in a manner that contributes to sustainable development principles means that the existing Green Belt cannot be sacrosanct and without review in the context of meeting substantial housing requirements. Furthermore, many non-Green Belt locations in South Gloucestershire are constrained by the likes of flood risk or designations such as AONB, ecological and landscape importance, and high agricultural value.</p> <p>Many of the small and medium sized settlements in South Gloucestershire will need to see some growth in order to both preserve existing services and facilities and bring about necessary improvements to their long-term sustainability. It will be important to direct a sufficient level of new homes to those small and medium sized locations that are well-served, or are capable of being, by key services and Public Transport links.</p> <p>It does seem clear that there will need to be an emphasis on the edge of Bristol, if objectives relating to reducing travel and cutting emissions are to be met. However, there is likely to be the additional need to spread new housing around the LPA area in a wider choice of sustainable locations given the overall requirement that will need to be met.</p>	
Waddeton Park Ltd - Land at Hicks Common Road	58. As examined above, the exploration of growth at villages is supported, but a one-size-fits-all approach is not appropriate for South Gloucestershire. Some villages like Winterbourne which are close to Bristol provide a greater opportunity to support the Climate Change Emergency through increased, sustainable growth, whilst other outlying villages such as Charfield and Falfield simply increase commuter distances travelled to the Greater Bristol conurbation and thus the impact	17 May 2021

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	<p>on Climate Change.</p> <p>59. Whilst the re-opening of Charfield Station which provides an opportunity for local modal shift is generally supported, Appendix 2 shows that many people who commute into Bristol City do not work near one of the railway stations in the city. This brings into question the convenience and usability of the travel mode if commuters have the inconvenience of multimodal trips which then become time consuming. As presented earlier the current use of this mode accounts for 2% of commuting. As such we would like to see the evidence base for the emerging Plan being more comprehensive in its assessment of different journeys from specific settlements and their convenience when related to the range of destinations within Greater Bristol. What Appendix 2 shows is that even with improved modal shift and self-containment, many settlements outside the Green Belt will continue to perform worse than Winterbourne in terms of Carbon tonnes per annum resulting from travel to work.</p> <p>60. We expect a Plan which genuinely seeks to address Climate Change, and which will focus on meeting local housing growth at settlements which have the capacity for increased growth at the most sustainable villages around the Bristol Fringe to be coupled with a realistic focus on the Urban Lifestyle potential of the North and East Fringe.</p>	
William Howell	East Bristol redundant green belt land could be put to better use.	23 Feb 2021
William Sharpe-Neal	Include Kington in the green belt.	28 Feb 2021

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