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## Report on Questionnaire Answers

Questionnaire: Local Plan 2020

Question: [20: Appendix 2: Draft policies: Climate Change and Mitigation] Do...

Respondent Name	User Response: Text	Response Created
A. Ashyon	I still think the council need to do more to ensure the climate is the first thought each councillor has when making a decision. Not people's jobs and profit before environment.	31 Jan 2021
Adam Mead	<p>Note that you are aware of the equalities issues raised by these policies. Air pumps are much more expensive to run than Gas Central Heating which will put more people in fuel poverty if this can't be addressed. It will also be difficult to install home charging points in houses that have to park their cars in the road, since I doubt it will be acceptable to have charging cables running across pavements to connect vehicles parked outside a house to the charging point within.</p> <p>Mostly these are matters for central government, not the council, but I am pleased to see you are poised to seize on any opportunity it gives you to assist in dealing with these options</p>	23 Feb 2021
Alan Jones - Hanham & District Greenbelt Conservation Society	<p>Due to our mixed environment, the eco-system in the Hanham area works well - plenty of walkers, cyclists, etc. enjoying the amenities of the area.</p> <p>We understand the logic of minimising commuting long distances, but the counter argument also applies, that to build on Green Belt land on the Urban fringe, will result in the anomaly of even more people driving 5 miles to exercise their dog!! A possible solution would be to develop local nursery estates, to grow produce for sale locally - reducing the carbon footprint and saving our green spaces.</p> <p>Commuting is a major contributor to Pollution/ Climate change. Information included in the consultation document, clearly states that the East Fringe of Bristol has already lost a high percentage of its Land Safeguarded for Employment to housing, with the ratio of resident workers to jobs at the extremely low level of 0.40. From this basic information, a clear policy of more employment opportunity would greatly reduce commuting and thereby assist mitigation of Climate Change within this area.</p> <p>Clear new Policy required - 'More Jobs, less housing in East Fringe of Bristol'!!</p> <p>Decarbonising transport during the course of this plan is a great target to aim for. However, the reality is, that the use of private vehicles is forecast to continue its increase, beyond the term of this plan. Through the course of the plan, a growing number of vehicles will be electrically powered, with 1 in 6 cars being electrically powered by 2030, but pollution from vehicle particulates also contribute to poor air standards, so the electrification of vehicles is only part of the longterm problem to mitigate polluting road journeys.</p>	26 Feb 2021
Andrew Shore	<p>As commented above, don't over-focus in non car use to the detriment of cars &amp; parking.</p> <p>Plant more new trees &amp; retain more old trees, as a key policy requirement.</p>	01 Mar 2021

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	Make dentists & doctors provided locally, to reduce the need for travel	
Angela Crabtree	Please see the Trapp'd Response.  (Thornbury Residents Against Poorly Planned Development)	28 Feb 2021
Angie Carroll - Parish Council	Only let solar farms on brownfield sites not on good farmland..	16 Feb 2021
Anne Thomson - Burbank Neighbourhood Watch	No	21 Jan 2021
Annette McLaren	Proposed developments are in conflict with Paris Climate Agreement Objectives	28 Feb 2021
Anthony Mcwhirter	By developing this area you are going to increase the level of pollution	26 Feb 2021
Ashfield Land	No comments.	31 Mar 2021
Barwood Development Securities & The North West Thornbury Landowner Consortium	<p>Climate Change Mitigation and Adaptation:</p> <p>It is important that there is clarity in this policy and certainty for all users of the Plan in determining what is required as part of new development proposals. At present we do not consider the draft version of the policy provided in Appendix 2 provides that clarity. Indeed, there are elements of the proposed text (for example locational requirements for development) which fall to the scope of the Local Plan itself, as opposed to a policy requirement for any future planning applicant to deliver.</p> <p>We suggest that a development management policy is drafted setting out explicitly what new development proposals are required to meet and that this is then subject to viability testing through the Local Plan process.</p> <p>We note the reference to producing a technical guide to support this policy and we support this in principle given the complexity of this policy area. It is important that the requirements are clearly defined within the policy itself and that the technical guide only expands upon these requirements. The PPG is very clear in this respect, advising that that any supporting guidance must not add any new policies or add to the financial burdens of the development (61-008-20190315).</p>	12 Apr 2021
Bloor Homes	<p>Draft Policy – Climate Change Mitigation and Adaptation:</p> <p>6.3 The current policy may be best placed as a strategic objective – as opposed to a policy in itself. As currently drafted, it doesn't set a standard or Development Management position through which development proposals could be judged – for example, how would a Planning Application decision-maker determine whether a proposal has made a sufficient 'contribution' or establish what constitutes 'maximising.' This would not meet the requirement set out in NPPF paragraph</p>	01 Apr 2021

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	<p>16(d).</p> <p>6.4 We suggest this policy is amended into a set of sound Development Management policies.</p>	
Bristol and England Properties (BEP)	<p>6.3 We generally support the purpose of this policy; however, there are concerns about its clarity in terms of what exactly will be required of developers. The policy wording requires the 'minimisation' of impacts and 'reductions' in Greenhouse Gas emissions, but does not establish a clear dividing line between what exactly needs to be achieved for proposals to be acceptable.</p> <p>6.4 The inference is that new development needs to be Carbon neutral given that this is an overarching aim for Council. However, this term needs to be defined explicitly so there is no ambiguity about what new development needs to achieve.</p> <p>6.5 If the intention is for this to be linked to the 'Energy Management in New Development' Policy, this should be made explicit or the two policies should be combined.</p>	17 May 2021
Caroline Phillips	<p>Mitigating and adaptation.</p> <p>What is being done beyond simply mitigation, where is the pro-active approach for the lead ahead of “risk management”?</p> <p>What about :- Policy for any future development to harness the tidal power in the Seven estuary.</p> <p>Policy to limit the mass development of housing in a single area?</p>	12 Mar 2021
Catherine Bird	You want to build on green belt areas - climate change is clearly not on your mind!	28 Feb 2021
Catherine Graham	too general. no real commitment. too much emphasis on consideration and mitigation...easy to wriggle	08 Feb 2021
CEG and the Charfield Landowners Consortium (CEGCLC)	Please see accompanying covering letter.	23 Apr 2021
Charlcombe Estates	Whilst the principle of this policy is supported, it is unclear what impact it will have on the development industry.	04 Mar 2021
Chris Rich - Mizmo Communications Ltd	No comment.	11 Mar 2021
Christina Biggs - Friends of Suburban Bristol Railways	If S Glos is to be serious about climate change, it should not build houses where people will need to own a car. This is sheer irresponsibility. S Glos already sends more cars into Bristol than any of the other surrounding local authorities - see the FoSBR submission to the WECA JLTP4 consultation. We recommend that S Glos	27 Feb 2021

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	learn from BANES and N Somerset who have many more passengers taking rail journeys, and make sure that people can travel to work or leisure by train. People should be able to travel car-free by walking or cycling or taking a bus to the nearest train station. Please do not support further road-building such as WECA's plans for a new motorway junction at Emerson's Green and rural bypasses round Coalpit Heath and Yate. Instead we strongly urge S Glos to talk to people like Nicholas Falk of Urbed who can explain the principles of co-planning housing with local rail. We would be happy to make such an introduction.	
Claire Normoyle	See pages 162 to 163 Insufficient priority is given in the policy of avoiding locations where the private car will be the primary means of commuting and other journeys. The locational consideration is the chief means by which climate change can be mitigated through planning strategy, but it is consigned to a mere mention under item b of the mitigation strategy. Other policies involving the right construction materials etc are a distant second in terms of impact; they can, and should, be applied to all development proposals, but they are not factors that can mitigate or offset a poor locational decision in which the private car will predominate. This policy as drafted, will allow some of the worst planning options possible with the ability to claim 'green credentials'.	19 Feb 2021
Clara Goss - Redrow Homes Ltd	Any emerging policy on this matter should dovetail with emerging WECS SDS policy on Climate Change and be subject to whole Plan viability appraisal.  Pegasus reserve the right to comment on the Technical Guidance document proposed to be published as part of the next consultation on the SGLP2020.	26 Apr 2021
Clifton Homes (SW) Ltd	We do not seek to comment on these at this stage.	24 Mar 2021
Colin Gardner - TRAPP'D	Insufficient priority is given in the policy of avoiding locations where the private car will be the primary means of commuting and other journeys. The locational consideration is the chief means by which Climate Change can be mitigated through planning strategy, but it is consigned to a mere mention under item b of the mitigation strategy. Other policies involving the right construction materials etc are a distant second in terms of impact; they can, and should, be applied to all development proposals, but they are not factors that can mitigate or offset a poor locational decision in which the private car will predominate. This policy as drafted, will allow some of the worst planning options possible with the ability to claim 'green credentials.'	15 Mar 2021
Crest Nicholson South West Ltd - Land at Harry Stoke/East of Harry Stoke (South)	Climate Change Mitigation and Adaptation:  It is important that there is clarity in this policy and certainty for all users of the Plan in determining what is required as part of new development proposals. At present we do not consider the draft version of the policy provided in Appendix 2 provides that clarity. Indeed, there are elements of the proposed text (for example locational requirements for development) which fall to the scope of the Local Plan itself, as opposed to a policy requirement for any future planning applicant to deliver.  We suggest that a development management policy is drafted setting out explicitly	12 Apr 2021

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	<p>what new development proposals are required to meet and that this is then subject to viability testing through the Local Plan process.</p> <p>We note the reference to producing a technical guide to support this policy and we support this in principle given the complexity of this policy area. It is important that the requirements are clearly defined within the policy itself and that the technical guide only expands upon these requirements. The PPG is very clear in this respect, advising that any supporting guidance must not add any new policies or add to the financial burdens of the development (61-008-20190315).</p>	
<p>Dan Erben - Thornbury Market Garden</p>	<p>This is a great start and the Council has increasingly been moving in the right direction, to the delight of many residents.</p> <p>We could go further and there is a strong and rapidly rising support in the community.</p> <p>Apart from the points already raised above (better planning policy and attitudes generally benefitting small, community-supported or community-benefit sustainable projects and protecting nature and valuable agricultural land), there should be more focus on reducing traffic and supporting more sustainable building methods (e.g. natural materials and better insulation, reducing consumption and waste) and creating and supporting truly local and sustainable employment opportunities.</p>	<p>23 Feb 2021</p>
<p>Daphne Dunning - Pucklechurch Parish Council</p>	<p>Truly sustainable economic growth and development means recognising that our long-term prosperity relies on rebalancing our demand of nature's goods and services with its capacity to supply them. It also means accounting fully for the impact of our interactions with nature. In the end our economies, livelihoods and well-being all depend on this one precious asset.</p> <p>With its emphasis upon growth and old failed methods of transport this draft plan fails to address sustainable development and its unsustainable engagement with Nature is endangering the prosperity of current and future generations.</p> <p>This policy needs to:</p> <p>Stop promoting measures that increase greenhouse gases – for example, increasing road capacity. There are many years of evidence that shows that new road capacity simply encourages more traffic and therefore increased greenhouse gas emissions.</p> <p>Introduce work-place parking charges and/or ultra-low emission zones and/or a congestion charging area – the policy fails to address these.</p> <p>Be less car-centric. Addressing this requires a range of measures, including: ensuring dense housing development with quality walking &amp; cycling; restricted car parking provision; the provision of transport &amp; delivery hubs to enable the use of bikes and similar for local deliveries.</p> <p>Be more supportive of climate adaptation measures such as green space and green architecture (eg roofs, walls, etc.).</p>	<p>08 Apr 2021</p>

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	<p>Another failure is a detailed plan for investment in an active travel infrastructure and quality public transport – essential in reducing car dependency. Written in to the plan should be in insistence that any development addresses this and that there are segregated cycle routes on main roads and upgraded cycle and pedestrian crossings where the emphasis is making easier to cycle/walk and more difficult to drive (Transport for Quality of Life has produced detailed briefings on how public transport and active travel needs to be developed and supported).</p> <p>There should be far more emphasis upon rail – especially where tracks (used or currently under/unused) already exist. As a local plan it could use the opportunity for development where rail is the main element of any travel infrastructure.</p> <p>There should be a requirement that any development put in place EV charging.</p> <p>Mitigating and adaptation. What is being done beyond simply mitigation?</p>	
David George	Create housing that respects and anticipates flood risk. Development unique properties allow water levels to enhance the local natural environment. Most of The Netherlands is based on this principle	15 Feb 2021
David Hathaway	No comment	27 Feb 2021
David Heape	<p>Mitigating and adaptation.</p> <p>What is being done beyond simply mitigation, where is the pro-active approach for the lead ahead of “risk management”?</p> <p>What about :- Policy for any future development to harness the tidal power in the Seven estuary.</p> <p>Policy to limit the mass development of housing in a single area?</p>	12 Mar 2021
David Redgewell - South West Transport Network and Railfuture Severnside	<p>More policy is required on sustainable transport.</p> <p>I do not see policy for Hydrogen powered buses or Electric bus fleets with a major bus depot for Stagecoach West at Patchway. Or First group looking for a new depot. Public Transport is going to change.</p> <p>Or for support for electrification of the Railway line from Chippenham to Bristol Temple Meads to Patchway and Bristol Parkway.</p> <p>The Henbury loop and Severn Beach line and access to the port of Bristol.</p> <p>The Portishead line.</p> <p>The Bristol Temple Meads, Lawrence Hill, Stapleton Road, Ashley Down, Filton Abbeywood? Bristol Parkway, Yate, Charfield, Cam, Dursley, Stonehouse Bristol Road, Gloucester, Cheltenham Spa, Ashchurch and Tewkesbury, Worcestershire Parkway and Birmingham New Street.</p>	28 Feb 2021

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	<p>We be planning for an electric railway.</p> <p>Clear policy on community windmills.</p> <p>Roof panels.</p> <p>There's no policy of power generation from the Bristol Channel River Severn.</p> <p>Green roofs.</p> <p>More policy to offer alternatives to the private School.</p>	
Debbie Johnson	Wetter months mean more flooding or ground holding water	26 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"> <li>Emersons Green Town Council suggests that alternative options alongside air source heat pumps are also considered.</li> </ul>	01 Mar 2021
Edward Ware Homes	<p>Climate Change Mitigation and Adaptation:</p> <p>6.3 EWH wholly support the purpose of this policy; however, there are concerns about its clarity in terms of what exactly will be required of developers. The policy wording requires the 'minimisation' of impacts and 'reductions' in Greenhouse Gas emissions, but does not establish a clear dividing line between what exactly needs to be achieved for proposals to be acceptable.</p> <p>6.4 The inference is that new development needs to be Carbon neutral given that this is an overarching aim for Council. However, this term needs to be defined explicitly so there is no ambiguity about what new development needs to achieve.</p> <p>6.5 If the intention is for this to be linked to the 'Energy Management in New Development' Policy, this should be made explicit or the two policies should be combined.</p>	05 May 2021
Ellandi LLP On Behalf of Crestbridge Corporate Trustees Ltd and Crestbridge T...	No.	05 May 2021
Emma Jarvis	It talks about incorporating measures for supporting local food production but does not mention protecting existing land which we use for local food production from	28 Feb 2021

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	development. We must protect our good agricultural land and our existing local food supply. This reduces transport miles. Good agricultural land is the most efficient and productive at producing crops and grazing livestock per square metre, it cannot easily be replaced or mitigated.	
Fiona Milden - Vistry Homes Limited	<p>Vistry Homes supports the draft policy on Climate Change and mitigation.</p> <p>Careful consideration should be given, through the preparation of the Local Plan, to the interrelationship between the objectives of this policy and the protection of the Green Belt.</p> <p>We welcome the draft Plan's recognition that land within the Green Belt will almost certainly be required to meet the development needs of the Plan Period. However, the Plan will need to carefully consider whether the protection of Green Belt should be prioritised over the use of land which could positively contribute towards the achievement of a Carbon neutral District, particularly on the inner Green Belt, which benefits from its close relationship with the Bristol urban area.</p> <p>In our view, land-use planning which contributes towards lifestyle habits and behaviours which are compatible with our environment and capable of reducing our impact on the planet should be acknowledged as exceptional circumstances which warrant the removal of land from the Green Belt. Accordingly, proposals which contribute positively towards Climate Change should take precedence over the protection of the Green Belt.</p> <p>In respect of the draft policy, we broadly support the intentions of the policy to mitigate and adapt to Climate Change. However, the opening statement requiring development proposals to demonstrate how they will help deliver radical reductions in Greenhouse Gas emissions fails to provide any measurable targets. Greater clarity should be provided through the policy to explain the Council's expectations of developments, within the context of the wider objective to deliver the District wide reductions in Greenhouse Gas emissions.</p>	09 Mar 2021
Fi Riches	You can't predict how climate change will affect our area	09 Dec 2020
Gareth Fielding	Don't build on agricultural land	28 Feb 2021
Hannick Homes	Whilst the principle of this policy is supported, it is unclear what impact it will have on the development industry.	25 Mar 2021
Heather Elgar - Woodland Trust	<p>Climate Change Mitigation &amp; Adaptation:</p> <p>We suggest that the role of, and challenge of increasing, natural carbon stores in capturing and storing residual emissions is added under 1) Climate change mitigation. We urge the Council to consider how planning policy can increase these natural carbon stores. We highlight the example from Cornwall, where the draft Climate Change DPD requires a net gain in the natural carbon of a development: Policy SC2 - Protecting Natural Carbon Storage: All major development proposals shall include a Carbon Storage Calculation showing the difference between the carbon storage capacities of the pre and post development habitat on the site. Any loss of carbon storage shall be compensated for with a carbon offsetting</p>	12 Feb 2021

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	contribution towards natural climate schemes within the Local Nature Recovery Network or through a suitable carbon reduction technology.	
Helen Johnstone - Stroud District Council	<p>SDC suggest the inclusion of the following issues in the policy wording in addition to the supporting text, in accordance with the Energy Hierarchy principle of first reducing energy demand, together with additional measures to supply energy efficiently/ cleanly and using onsite low or zero carbon energy generation:</p> <p>All new development must be:</p> <ul style="list-style-type: none"> <li>• located to minimise the need for travel through the form and mix of the development itself or proximity to essential services and travel</li> <li>• designed to discourage the use of the private car and maximise sustainable travel to deliver the highest possible share of trips by the most sustainable travel modes in the following order of priority: walking, cycling and public transport</li> <li>• designed to maximise Green Infrastructure to sequester carbon and support local food production</li> <li>• include reference to maximising the delivery of decentralised/ onsite renewable or low-carbon energy generation</li> </ul> <p>Mitigation measures a – g should also include reference to minimising waste and maximising recycling in construction and operation in accordance with the principles of the waste hierarchy and to promote a circular economy</p>	26 Feb 2021
Ian Leslie	Whilst giving lip service to Climate Change, every proposal just aggravates the existing problems. There is nothing here that shows any overall reduction in the factors that govern climate change	28 Feb 2021
IM Land	<p>68. It is important that the emerging policy is consistent with the emerging SDS regarding Climate Change and that the proposed separate guiding technical documentation is published for scrutiny at the same time.</p> <p>69. IM Land supports SGC's pledge to enable Carbon neutrality and the commitment to use the emerging Plan to aid this process. Whilst it is possible to improve the Carbon footprint of sites, buildings and their uses in a universal manner (as suggested by the emerging policy framework), this does not address the impact that travel patterns have on Carbon neutrality and we would welcome a Plan with a Spatial Strategy that also seeks this.</p> <p>70. The Office for National Statistics (Sept 2019 release) cites road transport as contributing 20% to Greenhouse Gas emissions in the UK. The ability to reach net zero by 2030 relies on an immediate implementation of a Spatial Strategy which reduces travel distances and can engender a change in the mode of travel as a result. This is 6% above what SGC's Carbon Pledge suggests and in our opinion is a material part of reducing the impact of Climate Change that the development plan can address through its Spatial Strategy.</p> <p>71. Encouraging development through the Plan-led system in sustainable locations which minimise both trip lengths and encourage modal shift is something that this Core Strategy Review should address now, to allow the benefit to be received by 2030 (9 years' time) when the Council is seeking to have reached zero net Carbon. The reason it needs to be addressed now is that the average lead-in time of major</p>	11 May 2021

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	<p>development can be as long as 5 years and that would only leave 4 more years to deliver the transition.</p> <p>72. In the context of proper spatial planning one of the most important aspect for the Plan to address is the balance between maintaining some parts of the inner Green Belt as a protective policy and allowing development in locations such as Pucklechurch which will address the declared Climate Change Emergency.</p> <p>73. It is suggested that as part of the evidence base to support the emerging Plan and the declared Climate Change Emergency, further detailed research should be undertaken about the impacts of where development is located and how, for example, the creation of mixed-use communities at the right scale can provide a substantial positive response to Climate Change. This is something the Sustainability Appraisal has not explored yet.</p> <p>74. IM Land would welcome the opportunity to work with SGC to respond to the declared Climate Change Emergency.</p> <p>75. We are however concerned about the level of prescription in the current proposed policy wording. Criteria a - g for example, should be an advisory list for individual site developers to refer to in demonstrating how Climate Change is addressed. Over prescription in the policy can stifle innovation and delivery.</p> <p>76. Regarding the Adaptation measures set out in the supporting text a - g, it is important that these are presented as guiding principles rather than a list of fixed requirements. This is because not all developments, such as urban intensification for example, may be able to support local food production whereas other locations such as our client's land can.</p>	
IM Land Limited	<p>8.1 Whilst supportive of the new Climate Change and energy measures proposed, our client would recommend that a consistent approach is adopted across the region to provide developers with certainty. Any new policy measures need to be based upon a proportionate evidence base to be found 'sound' and this should include an assessment of their impact upon viability; both on an individual site level and on a whole-Plan basis to ensure that other policy aspirations are not unduly impacted (e.g., affordable housing).</p>	26 Mar 2021
Ivywell Capital (IC)	<p>6.3 We generally support the purpose of this policy; however, there are concerns about its clarity in terms of what exactly will be required of developers. The policy wording requires the 'minimisation' of impacts and 'reductions' in Greenhouse Gas emissions, but does not establish a clear dividing line between what exactly needs to be achieved for proposals to be acceptable.</p> <p>6.4 The inference is that new development needs to be Carbon neutral given that this is an overarching aim for Council. However, this term needs to be defined explicitly so there is no ambiguity about what new development needs to achieve.</p> <p>6.5 If the intention is for this to be linked to the 'Energy Management in New Development' Policy, this should be made explicit or the two policies should be combined.</p>	17 May 2021

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James Carpenter - Falfield Parish Council	Yes – consideration of protecting our best and good agricultural land. It is better environmentally to grow our own crops locally than transport them long distances. Best and good land is more efficient at this.	14 Apr 2021
Jenny Raggett - Transport for New Homes	We support the section on 'Movement' but would suggest the word 'frequent' before public transport. Also (b) is too vague a) The layout integrates with existing or permitted adjacent development and connects with the wider network of foot, cycle and <b>**frequent**</b> public transport links,  b) Safe and sustainable access to existing and proposed “Key Services & Facilities” is provided or enhanced, <b>***with a new emphasis on mix-use development to create walkable neighborhoods. ***</b>	01 Mar 2021
John Acton	None that I am aware of.	26 Mar 2021
John Brimacombe	Consideration to the reintroduction of native species and the protection of existing.	28 Feb 2021
John Mills - Cotswolds Conservation Board	<p>In principle, the Cotswolds Conservation Board supports the policy aspiration for development proposals to demonstrate how they will mitigate and adapt to climate change and help deliver radical reductions in greenhouse gas emissions and generate renewable and / or low carbon energy proportionate to their scale and type.</p> <p>The Board published the ‘Climate Change Strategy for the Cotswolds Area of Outstanding Natural Beauty’ in 2012. Many of the principles and measures outlined in the Climate Change Strategy have been integrated into Policies CC7 and CC8 of the Cotswolds AONB Management Plan 2018-2023. The Board is currently reviewing the Climate Change Strategy, with a view to adopting an updated version in June 2021.</p> <p>We recommend that South Gloucestershire Council should have regard to this Climate Change Strategy when developing its climate change and mitigation policy (and related policies).</p> <p>The draft policy does not currently identify thresholds for what would constitute an appropriate or acceptable contribution to the three criteria specified in the policy. This potentially makes it easy for developers to secure planning permission for developments that do not make as great a contribution as they could or should do.</p> <p>The policy and / or the supporting text could potentially identify specific thresholds such as those required in the proposed Future Homes Standard or reflecting best practice such as BREEAM.</p> <p>It would be useful if the policy could also be applied to the retrofitting of existing development as well to new development.</p> <p>Our comments relating specifically to renewable energy are covered in our response to the ‘Renewable and Low Carbon Energy System’ policy.</p>	16 Mar 2021

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Jonathan Edwardes - Pilning and Severn Beach Parish Council	<p>We see that WECA now has a 'Nature Partnership'. That must work with (and not in competition with) Forest of Avon Community Forest and Avon Wildlife Trust.</p> <p>Additional comments sent by email on Monday 1st March 2021 -</p> <p>The Cresswell Report of 2011 is still extremely relevant to the Severnside area, to its habitat, flora and fauna, and so should be referenced in your text and in your bibliography.</p> <p>The raising of the sea defences from Aust to Avonmouth should not be allowed as an excuse to enable further development within the coastal zone. The previous policy of only permitting development that is necessary in the Coastal Zone should be confirmed.</p>	26 Feb 2021
Kate Kelliher	<p>Existing buildings and housing exists and will be with us for a long time. It must be a high priority to future proof these houses and buildings in a sustainable way. Southglos has a large proportion of home owners. They must be helped, financially and technically to achieve better use of energy. PassivHaus may be too high a standard to aim for. We could do things that would make a big difference without chasing PassivHaus standards.</p>	31 Jan 2021
Katherine Adair - UK Green Building Council	<p>UKGBC agree with the proposed approach and support policy which requires development proposals to demonstrate climate change mitigation and adaptation measures.</p> <p>In addition to setting requirements to maximise the generation of renewable energy, there should also be a requirement to pursue a 'fabric-first' approach to design and construction, and increase energy efficiency in the first instance, as well as then maximising renewable energy production. This is mentioned in the supporting text, but is a fundamental issue and as such should be included in the main policy wording.</p>	17 Mar 2021
Katherine Buff	<p>See pages 162 to 163</p> <p>Insufficient priority is given in the policy of avoiding locations where the private car will be the primary means of commuting and other journeys. The locational consideration is the chief means by which climate change can be mitigated through planning strategy, but it is consigned to a mere mention under item b of the mitigation strategy. Other policies involving the right construction materials etc are a distant second in terms of impact; they can, and should, be applied to all development proposals, but they are not factors that can mitigate or offset a poor locational decision in which the private car will predominate. This policy as drafted, will allow some of the worst planning options possible with the ability to claim 'green credentials'.</p>	26 Feb 2021
Kevin Masters	<p>I have read Trapp'd's response and wish to add my name to it.</p>	25 Feb 2021

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Lauren Cook - Stride Treglown	<p>No, it is considered that all relevant issues are addressed through this high-level policy with the measurable requirements set out in a further policy.</p> <p>We support the production of a technical guidance document to accompany the local plan to enable easy interpretation of the policy requirements for all scales of development to avoid ambiguity. It is considered that this document needs to be published at the same time as the Local Plan to ensure the policies can take maximum effect from the outset in the drive to become carbon neutral by 2030.</p>	01 Mar 2021
Lee Taylor	Climate change needs to be of high importance and a key driver in any development. Without renewable energy sources being part of properties in new developments they should not be allowed to proceed	23 Jan 2021
Leyla Hawkes	Local wildlife and habitat needs to be respected and NOT built on!	22 Feb 2021
Lizzie Staley	The houses being built in Thornbury have been built in places that make people have to drive into the town centre or to places of work, and to surrounding towns and cities. If this is already happening with no provision being made for alternatives, then the problem is increasing and gives the impression the same will happen at all other proposed mass developments. This makes climate change worse.	28 Feb 2021
Louise Powell - Thornbury Town Council	Opportunities should be taken to protect and enhance green spaces in all areas i.e., Market Town developments as well as rural areas. Any opportunity to build 'green' into the urban landscape should be taken.	08 Apr 2021
Mactaggart & Mickel - Frampton Cotterell	Whilst the principle of this policy is supported, it is unclear what impact it will have on the development industry.	07 Apr 2021
Marian Gilpin	The possibility of creating a passenger railway link from Thornbury quarry through Yate station into Bristol. This would move a lot of traffic off the roads.	09 Feb 2021
Martyn Hall	You need to bring the thornbury line to top of agenda ASAP as a short line through the tunnel is all that is required giving thornbury a way of getting to Bristol without using cars ! This is about to increase so avoiding this issue and expecting people to drive to falfield isn't going to happen !	26 Feb 2021
Matthew Blaken - DJ&P Newland Rennie Ltd	The balance of achieving 'climate change' compatible development should not necessarily over burden outline planning but should be a consideration of detailed / reserved matters or building regulation approval.	14 Dec 2020
Matthew McCollom	The principles are sound. The manner of implementation is the key. Perhaps the Lightwood Group (in Shortwood) proposed area would be more suited to growing withies for green energy, carbon capture and to reduce water run off. Or perhaps to encourage the adjacent ancient woodland to colonise those fields.	28 Feb 2021
Maurice Wayne	No	08 Feb 2021
Melinda Evans	Council should proactively identify sites suitable for renewable energy projects (including storage) as part of the Plan. This will remove a large impediment to community groups wishing to commission these.	01 Mar 2021

<b>Respondent Name</b>	<b>User Response: Text</b>	<b>Response Created</b>
Michelle Greaves	<p>As mentioned above -</p> <p>Additional issues to consider under climate change and the environment: transitioning to more environmentally friendly ways of developing. We have a greater need to plan for carbon neutral, more electric cars, and more facility to reuse rather than recycle/ dispose of waste as well as develop in mind of the local wildlife and environment. This should impact any future developments, considering what materials are being used (are they sustainable/ renewable), the carbon footprint of taking out any work and facility for eco homes/ sustainable energy and what we do with the waste from these new houses (not just landfill). Is there a good green transport infrastructure in place. These considerations are big challenges and need to to be acknowledged - and came up on one of the online teams briefings talks today.</p>	03 Feb 2021
Mike Burgess	I agree with the policies but simply talking up the benefits of Walking/ Cycling and Public Transport will not change behaviours . What works in well-resourced ( social & health, economic as in retail , leisure & employment, and transport) Urban and City environments does not work in rural areas.	21 Feb 2021
Miller	Scrap the park and ride. Scrap the cycle lanes.	01 Dec 2020
Mr. Blake - Oldland Parish Council	Climare Change is a natural phenomenon not helped by mankind. Climate Change can only be 'slowed' and if only half of the present initiatives 'on the table' were adopted, that objective will be achieved. More people need to take heed of the fact that Climare Change is happening and NOT IGNORE it. Better to have a list of 'achievable' objectives and meet all of them, rather than a long list and only 'achieve' part of them	17 Feb 2021
Newland Homes - Land at Aust Road	<p>6.3 We generally support the purpose of this policy; however, there are concerns about its clarity in terms of what exactly will be required of developers. The policy wording requires the 'minimisation' of impacts and 'reductions' in Greenhouse Gas emissions, but does not establish a clear dividing line between what exactly needs to be achieved for proposals to be acceptable.</p> <p>6.4 The inference is that new development needs to be Carbon neutral given that this is an overarching aim for Council. However, this term needs to be defined explicitly so there is no ambiguity about what new development needs to achieve.</p> <p>6.5 If the intention is for this to be linked to the 'Energy Management in New Development' Policy, this should be made explicit or the two policies should be combined.</p>	14 May 2021
Newland Homes - Land West of The B4061 Bristol Road	<p>6.3 We generally support the purpose of this policy; however, there are concerns about its clarity in terms of what exactly will be required of developers. The policy wording requires the 'minimisation' of impacts and 'reductions' in Greenhouse Gas emissions, but does not establish a clear dividing line between what exactly needs to be achieved for proposals to be acceptable.</p> <p>6.4 The inference is that new development needs to be Carbon neutral given that this is an overarching aim for Council. However, this term needs to be defined explicitly so there is no ambiguity about what new development needs to achieve.</p>	13 May 2021

<b>Respondent Name</b>	<b>User Response: Text</b>	<b>Response Created</b>
	6.5 If the intention is for this to be linked to the 'Energy Management in New Development' Policy, this should be made explicit or the two policies should be combined.	
Nick Hudson	not unless you genuinely are talking about genuine change in the way we do things - and if that was the case most people would hate your plans	15 Jan 2021
Nick Woodward	The aim to reduce overall emissions is commendable but moving forward cannot only be considered for future developments. Emerging transport solutions and flexible workplace policies will also play a large contribution to the climate emergency we face and should be considered in the mix.	28 Feb 2021
Nicola O'Connell	No comment	27 Feb 2021
North Thornbury Landowners Consortium	This is a complex policy area and we support the production of a technical guide to underpin the policy.	29 Apr 2021
Patricia Trull - South Glos Council	Help get this information out into the public domain. Use parish web sites, parish news letters and magazine. Face book pages, twitter. Be serious about climate change. Challenge people to make a difference. Be a champion, going into schools. Children drink up this information.	08 Dec 2020
Patrick Williams	This has to be an accord with the Paris Agreement or any other national policy. See answers to 22, 24.	09 Mar 2021
Paula Evans - Rangeworthy Parish Council	Encourage larger employers (say 100+ employees) to have their own bus to take workers to the workplace. One bus is equal to 50 people rather than 50 individual car journeys with one person.	26 Feb 2021
Pauline and Richard Wilson	<p>This is an important intrinsic section of the plan. The following points should be incorporated:</p> <ol style="list-style-type: none"> <li>1. The Local Plan addresses development, particularly housing, but there is little mention of how land and agricultural practices can mitigate climate change effects. For instance large barns can have solar panels on their roofs, ponds to collect roof run off but separate from any effluent run off, etc. If barns and warehouses had solar panels there would be less need for solar farms.</li> <li>2. There need to be many more ponds or water storage in the headwaters of local rivers to slow down river flow. Water storage facilities should allow for slow percolation to even out flow during wet weather.</li> <li>3. All houses should be of the highest standard of insulation and energy production. Each house should be designed to be carbon neutral and that includes low cost housing.</li> <li>4. All new homes must have grilles on their driveways to take rainwater away. This also includes existing homes that pave over their front gardens and then ask the Council for a dropped kerb.</li> </ol>	25 Feb 2021

<b>Respondent Name</b>	<b>User Response: Text</b>	<b>Response Created</b>
	<p>5. We liked the reference to local food production and support but it should also include provision of allotments.</p> <p>6. Facilities for electric cars and bikes should be mandatory on all new developments. On larger developments hubs for the hire of electric bikes may be appropriate.</p> <p>7. Wherever possible existing buildings should be adapted for change of use not knocked down, ground up and new buildings erected. If this is not possible this use of energy should be factored into the calculation of whether the development is sustainable or not i.e. carbon neutral.</p>	
Persimmon Homes Severn Valley	<p>Please see attached document.</p> <p>New Policy: Climate Change and Adaptation:</p> <p>6.4 We generally support the approach of this policy. We believe that one of the key aspects of the policy is that set out in part (b) of the supporting text relating to ensuring that development is located in areas where the need to travel is minimised and opportunities for utilising sustainable transport are optimised.</p> <p>6.5 We are also support measures to reduce Greenhouse Gas emissions and improve energy efficiency. However, the policy should be clear that proposals will considered on their individual merits including taking into account factors such as the availability of technology and viability. It is important, however, that the Plan is consistent (and does not attempt to exceed) the requirements and provisions set out in Building Regulations.</p>	11 May 2021
Peter Box	<p>Insufficient priority is attached to this issue and it is in danger of being submerged by an apparent desire to be able to claim that South Gloucestershire is able to provide more housing than the LOCAL communities really need.</p>	23 Feb 2021
Peter Rawlinson - Gleeson Strategic Land	<p>Gleeson does not have any specific comments on this topic but would point out that policies relating to Climate Change and Mitigation will need to be aligned with any overarching policies on the subject set out in the future Spatial Development Strategy. Until the technical guidance document is available it is difficult to provide more detailed comments.</p>	10 Mar 2021
Progress Land Ltd	<p>No.</p>	11 May 2021
Rebecca Woodward	<p>The overall will to reduce emissions is commendable but it cannot only be considered moving forward in respect to future developments. Existing transport methods, workplace policies and housing play a massive contribution to the climate emergency and also has to be considered.</p>	28 Feb 2021
Redcliffe Homes	<p>Whilst the principle of this policy is supported, it is unclear what impact it will have on the development industry.</p>	04 Mar 2021
Redcliffe Homes	<p>No comments.</p>	01 Jun 2021

<b>Respondent Name</b>	<b>User Response: Text</b>	<b>Response Created</b>
Redrow Homes (SW)	<p>Please see enclosed representations.</p> <p>Climate Change Mitigation and Adaption:</p> <p>5.3 This policy sets out SGC aims to become Carbon neutral by 2030. This is a challenging goal and we do not disagree that it should be an aim, however we do agree with the flexibility that the current wording provides at point 1: ‘or the latest target set out in the Climate Change strategy,’ because this will allow the 2030 aim to be kept under review and not tie the Council to a target that becomes unrealistic due to changing circumstances.</p> <p>5.4 We would also suggest that the words ‘where practical’ be added to criterion no.2 of the policy wording. Because while we fully support the need to maximise renewable/low Carbon energy sources as part of new development, in some instances certain technologies will not be practical (i.e. ground heat pumps in areas of shallow bedrock, wind power on visually exposed sites etc). The updates to Part L/F of the Building Regulations should be used to inform the proposed Regulation 19 SGLP2020.</p> <p>5.5 We also welcome the policies reference to one of the key ways the aims of this policy will be met, namely by locating development where the use of the private car can be minimised. This reinforces the need to allocate land at places such as Yate, and not rely on new freestanding communities such as Buckover which have the strong potential, to become dormitory towns with little alternatives to the private car available.</p> <p>5.6 We fully support the policy aims to locate development outside of areas prone to flooding, enhance access to recreational space to promote health and wellbeing, enhance Biodiversity and seek to provide opportunities for local food production, such as allotments.</p>	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 Lloyd	This is a very good and welcome policy. The issues covered look comprehensive.	03 Mar 2021
Robert Harris - Olveston Parish Council	An early declaration of a Climate Emergency by SGC has had the effect of concentrating minds on the impact that society and community have on the environment in its widest sense. This is well represented in this Local Plan.	26 Feb 2021
Robin Perry	The ability to act now on building requirements to mitigate climate change without waiting for national policy or regulation.	21 Feb 2021
Roger Hall	See TRAPP'D response.	25 Feb 2021
Sean and Jacqueline	Insufficient priority is given in the policy of avoiding locations where the private car will be the primary means of commuting and other journeys.	26 Mar 2021

<b>Respondent Name</b>	<b>User Response: Text</b>	<b>Response Created</b>
Rinaldi		
Simon Fitton - YTL Developments (UK) Ltd	YTL supports the overall strategy within the policy and supporting text. The devil is often in the detail and it is acknowledged that this is a very early stage in the drafting process and the policy will naturally evolve through further iterations of Plan preparation. Care must be taken with the wording. Where for example the policy requires (point 2) that development proposals must maximise the generation of energy from renewable sources, care must be taken to explain that this is not at the cost of developable land. Solutions must be found that don't compromise the overall vision for urban lifestyles and maximising the efficiency of land. The policy should therefore be read (and be made clear) that the intent is to maximise potential within the constraints of the development proposed. This will help maintain scheme viability and ensure other objectives of the Plan are met.	16 Mar 2021
Simon Moore	<p>Policies must include:</p> <ol style="list-style-type: none"> <li>1. All development in the county to include heat pumps, solar panels, electric car charging points, full insulation - without exception.</li> <li>2. Zero carbon by a precise target date.</li> <li>3. Target date to remove all gas boilers from the county.</li> <li>4. Over-riding priority to restore grassland, woodland, heath and scrub, as carbon absorbers, where this has been degraded by previous development.</li> </ol>	28 Feb 2021
Simon Steele-Perkins - Waddeton Park Limited	This is a vitally important issue for the Local Plan, and the policy approach seems good, though the more important way for the Local Plan (and the SDS) to address these matters is through the Spatial Strategy and the planned integration of development and the management of movement.	06 May 2021
South West Housing Association Planning Consortium (HAPC)	There are a number of working draft policies at Appendix 2 which concern Climate Change mitigation, energy management and electric car charging. We support these draft policies where the Council can show that they have been robustly viability tested. While these policies are essential for futureproofing our communities, they should not restrict the delivery of much needed affordable housing in South Gloucestershire, especially as affordability remains a key issue for the Council.	14 May 2021
South West Strategic Developments (SWSD)	Please see enclosed representations.	31 Mar 2021
St. Modwen Developments and The Tortworth Estate	The Council's approach should align with that of the WoE SDS. Consideration could also be given to including references to best practice certificates/documents (e.g. BREEAM) to help facilitate delivery of development that is as sustainable as it possibly can be and being measurable against development industry benchmarks.	05 Mar 2021
Stephen Hickmans	Consider risk of flooding.	26 Jan 2021
Steven Freke	A cradle to grave approach should be adopted when assessing all aspects of planning	27 Feb 2021
Steve Seward	<p>Expanding our population areas does not go hand in hand with Climate change mitigation.</p> <p>Much more effort must go into resisting any further huge developments if we are to</p>	13 Feb 2021

<b>Respondent Name</b>	<b>User Response: Text</b>	<b>Response Created</b>
	protect against even bigger climate change issues	
Strongvox Homes	<p>Climate Change Mitigation and Adaptation:</p> <p>6.3 Strongvox Homes support the purpose of this policy; however, there are concerns about its clarity in terms of what exactly will be required of developers. The policy wording requires the 'minimisation' of impacts and 'reductions' in Greenhouse Gas emissions, but does not establish a clear dividing line between what exactly needs to be achieved for proposals to be acceptable.</p> <p>6.4 The inference is that new development needs to be Carbon neutral given that this is an overarching aim for Council. However, this term needs to be defined explicitly so there is no ambiguity about what new development needs to achieve.</p> <p>6.5 If the intention is for this to be linked to the 'Energy Management in New Development' Policy, this should be made explicit or the two policies should be combined.</p>	11 May 2021
Sue Green - Home Builders Federation	<p>The South Gloucestershire, Bristol, BANES &amp; North Somerset Councils and the WoE Combined Authority are committed to working together on the preparation of a SDS for the period 2020 – 2040, which is expected to cover strategic planning priorities including a response to climate change emergency declarations. The Council's policy approach to Climate Change &amp; Mitigation should be aligned with the SDS strategy for Climate Change.</p> <p>The HBF will submit further comments on publication of the Council's Technical Guidance document, which will set out how the policy requirements of the Climate Change Policy can be achieved. It is understood that this Technical Guidance will be prepared to accompany the Local Plan Review.</p>	05 Mar 2021
Susan Smith	No	16 Feb 2021
Swanmoor Stoke Ltd	<p>See accompanying Representation.</p> <p>SSL recognise the importance of delivering a Local Plan which seeks to address Climate Change and delivers appropriate mitigation. However, as set out in the Representation, not all priorities will be achievable in all circumstances and there will be a need to weight some elements which contribute to addressing the issue of Climate Change against others. For example, locating development where it may be well placed to decarbonise transport, deliver a holistic approach to an energy network or locate development in close proximity to economic development promoting more walkable neighbourhoods may also require delivery of development in Flood Zones 2 or 3. This is a matter of sequential analysis and also to ensure that an appropriate approach is adopted to such development so that individuals are not placed at greater risk and site specific strategies are robust.</p>	06 Apr 2021
Terry Chamberlain and Alan Jobbins	<p>Climate Change Mitigation and Adaptation:</p> <p>6.3 We generally support the purpose of this policy; however, there are concerns about its clarity in terms of what exactly will be required of developers. The policy</p>	05 May 2021

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	<p>wording requires the 'minimisation' of impacts and 'reductions' in Greenhouse Gas emissions, but does not establish a clear dividing line between what exactly needs to be achieved for proposals to be acceptable.</p> <p>6.4 The inference is that new development needs to be Carbon neutral given that this is an overarching aim for Council. However, this term needs to be defined explicitly so there is no ambiguity about what new development needs to achieve.</p> <p>6.5 If the intention is for this to be linked to the 'Energy Management in New Development' Policy, this should be made explicit or the two policies should be combined.</p>	
Theodore Butt Philip - South Gloucestershire Liberal Democrat Council Group	We support the existing proposals, though hope that the implementation will be as ambitious as the rhetoric.	12 Mar 2021
The Tortworth Estate	The Council's approach should align with that of the WoE SDS. Consideration could also be given to including references to best practice certificates/documents (e.g. BREEAM) to help facilitate delivery of development that is as sustainable as it possibly can be and being measurable against development industry benchmarks.	05 Mar 2021
Tom Cotton - Road Haulage Association	See our response at 3.	01 Mar 2021
Tony Kerr	Conservation officers seem to believe that buildings should never change again, and, for example, don't allow double glazing in conservation areas. Towns have changed over the years according to occupiers needs. Few have pigs in the garden now!. Policy should set out the nature of change which would be allowed in consevation areas to meet enrgy conservation objectives. Issue is not protection of appearance at date of designation or listing.	17 Feb 2021
Trevor James	I agree with what you say – 'Climate change is happening now and is the biggest challenge facing our society.' It is our biggest threat – more so than Covid. All planning decisions must consider this as the number 1 priority.	26 Feb 2021
Trystan Mabbitt - Hanson UK - Heidelberg Cement Group	No comment.	18 Mar 2021
Victoria Bailey - Oldbury on Severn Parish Council	<p>'Incorporating measures to adapt to potential flood risk at building and site level, and minimise flood risk to the wider area' should include estuarine defences and recognise the needs and aspirations of local coastal communities.</p> <p>As rainfall patterns change with rain events becoming more intense and more frequent SuDS will only reduce discharge from new developments. Existing "historic" development predating SuDS will produce ever increasing surface water discharges impacting on the capacity of the surface water drainage system. Unless considered efforts are made into attenuating these increased flows into this system</p>	24 Mar 2021

Respondent Name	User Response: Text	Response Created
	<p>flooding to downstream receptors will be inevitable. We would request that actions are taken to either introduce attenuation systems into the surface water discharge system and/or to increase the capacity of the rhine network to hold the increased surface water volumes. Furthermore, serious consideration should be given to improving the discharge rates of the tidal outfall gate at the Oldbury Naite Rhine Penstock. Works should be undertaken with some urgency to reflect the SMP2 Action Plan.</p>	
Vistry Group	<p>Please refer to enclosed representations.</p> <p>Climate Change Mitigation &amp; Adaptation:</p> <p>The wording set out in Draft Policy ‘Climate Change Mitigation &amp; Adaptation’ refers to a requirement for development proposals to demonstrate ‘radical reductions in Greenhouse Gas emissions and generate renewable and/or low Carbon energy proportionate to their scale and type.’ It is not clear from the policy wording or supporting text what is required of the developer to achieve ‘radical’ reductions, or whether this policy is seeking to step away from the requirements set out in the Future Homes Standard (see further comments below under ‘Energy Management in New Development’). For the reasons described above, the scope of the policy should be defined clearly so there is no ambiguity regarding how a decision maker should respond to development proposals.</p> <p>The supporting text infers that a ‘Technical Guidance document’ will be prepared to accompany the Local Plan to set out how the policy requirements of the Climate Change Policy can be achieved, but this should be made available for scrutiny as part of any policy formulation to ensure that viability and deliverability considerations can be properly scrutinized and assessed.</p>	06 May 2021
Waddeton Park Ltd - Land at Hicks Common Road	<p>65. It is important that the emerging policy is consistent with the emerging SDS with regard to Climate Change and that the proposed separate guiding technical documentation is published for scrutiny at the same time.</p> <p>66. SGC’s pledge to enable Carbon neutrality and the commitment to use the emerging Plan to aid this process is broadly supported. Whilst it is possible to improve the Carbon footprint of sites, buildings and their uses in a universal manner (as suggested by the emerging policy framework), this does not address the impact that travel patterns have on Carbon neutrality and as has been said throughout, we would welcome a Plan with a Spatial Strategy that also seeks this.</p> <p>67. The Office for National Statistics (Sept 2019 release) cites road transport as contributing 20% to Greenhouse Gas emissions in the UK. The ability to reach net zero by 2030 relies on an immediate implementation of a Spatial Strategy which reduces travel distances and can engender a change in the mode of travel as a result. This is 6% above what SGC’s Carbon Pledge suggests and in our opinion is a material part of reducing the impact of Climate Change that the development plan can address through its Spatial Strategy.</p> <p>68. Encouraging development through the Plan-led system in sustainable locations which minimise both trip lengths and encourage modal shift is something that this</p>	17 May 2021

Respondent Name	User Response: Text	Response Created
	<p>Core Strategy Review should address now, to allow the benefit to be received by 2030 (9 years' time) when the Council is seeking to have reached zero net Carbon. The reason it needs to be addressed now is that the average lead-in time of larger development can be as long as 5 years and that would only leave 4 more years to deliver the transition. Sites at the scale of Hicks Common Road (up to 300 dwellings) would be completed well within the timeframe and would show a measurable response to the Climate Change.</p> <p>69. In the context of proper spatial planning, one of the most important aspects for the Plan to address is the balance between maintaining some parts of the inner Green Belt as a protective policy and allowing development in locations such as Winterbourne which will address the declared Climate Change Emergency.</p> <p>70. It is suggested that as part of the evidence base to support the emerging Plan and the declared Climate Change emergency, further detailed research is undertaken about the impacts of where development is located and how, for example, the creation of mixed-use communities at the right scale can provide a substantial positive response to Climate Change. This is something the Sustainability Appraisal has not explored yet.</p> <p>71. We would welcome the opportunity to work with SGC to respond to the declared Climate Change emergency.</p> <p>72. We are, however, concerned about the level of prescription in the current proposed policy wording. Criteria a - g for example, could be an advisory list for individual site developers to refer to in demonstrating how Climate Change is addressed. Over prescription in the policy can stifle innovation and delivery in a sector that is driven by change.</p> <p>73. Regarding the Adaptation measures set out in the supporting text a - g, it is important that these are presented as guiding principles rather than a list of fixed requirements. This is because not all developments, such as urban intensification for example, may be able to support local food production whereas other locations such as our client's land can.</p>	
William Howell	No	23 Feb 2021

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