

South Gloucestershire Core Strategy



Schedule Summary Report December 2010

Schedule summary report

This report is a summary of the main issues raised by representations to the Pre-Submission Publication Draft Core Strategy during public consultation between March and August 2010. For each chapter/section/policy etc of the Core Strategy the report is structured in the following way:

- the number of objections and statements of support, including brief details of the objectors and supporters
- the main issues raised by the objections
- an officer response to these issues and whether proposed changes to the Core Strategy are appropriate
- cross-reference to the relevant proposed changes

Details of the individual representations are available on our website at www.southglos.gov.uk/corestrategyconsultation and should be read alongside this report. The detailed wording of the proposed changes are set out in the Schedule of Proposed Changes to the Core Strategy, December 2010 available from our website at www.southglos.gov.uk/corestrategy.

Chapter 1 - Introduction

18 objections and 2 statements of support were received about the introduction to the document in chapter 1. Around half of the objections were from members of the community expressing concerns over the public consultation. Other objections concerned updating and points of clarification, including to the SPD timetable and the replacement of saved local plan policies. These objections were predominantly from developers.

Response

This chapter will require updating to take account of the current situation regarding the RSS and other changes proposed to the planning system by the coalition government and any other relevant developments. The timetables for SPD preparation will be set out in future versions of the Local Development Scheme (LDS). The paragraphs on consultation involvement are a matter of fact and are consistent with plan making regulations set out in PPS12 which advises local authorities to engage key stakeholders in timely and effective discussions.

Proposed Changes – PC6 – PC17

Chapter 2 – Setting the scene

5 objections were received (none are from the local community), covering the following points:

- The inter-relationship of Yate and Chipping Sodbury is not recognised
- The benefits of development at Severnside are not recognised

- Incorrect spelling of Cotswolds AONB
- Potential archaeological significance of the Severn Estuary not recognised
- Include cost of moving goods in reference to congestion

Response

The purpose of Chapter 2 is to provide a brief overview of the district. It is not the chapter for expanding upon the benefits or otherwise of developing a particular area. The cost of congestion is covered in paragraph 2.7 of the Core Strategy the other three points are accepted for amendment.

Proposed Changes – PC18 – PC22

Chapter 3 – Key issues

30 objections and 16 statements of support were received in relation to Chapter 3.

Objectors included developers, local residents, Local Councillors, Filton College, Friends of the Earth, English Heritage and Avon Wildlife Trust.

Supporting comments were received from developers, Local Councillors, a Housing Association, the Highways Agency, NHS South Gloucestershire, CPRE and Avon Wildlife Trust.

The main issues identified were:

General

- Resource depletion and fuel price escalation should be added as a key issue. In particular, the issue of Peak Oil should be reflected in decisions over the timescale of this strategy.
- Suggest a matrix is included in the plan which shows how the issues and objectives relate to the policies in the Core Strategy. This will help future monitoring.

Key Issue 1 – Reducing and Adapting to Climate Change

- No key issues identified but see general comment on resource depletion above.

Key Issue 2 – Managing Future Development

- Issues identified were connected with objections to the Strategy for Development (evidence for overall level of development, level of housing need, significance of South Gloucestershire in the sub-region) and so are addressed in the statement on the Strategy for Development.

Key Issue 3 – Maintaining Economic Prosperity

- Object to the strategy on the grounds that it should provide for more employment in the Bristol North Fringe and Thornbury.
- There is no mention of skills development which must play a significant part in ensuring that the workforce has appropriate skills to ensure economic prosperity.

Key Issue 4 – Providing Housing for All

- Issues identified related to objections to the strategy for development and Policy CS15 (evidence for level of housing need, lack of five year land supply, over reliance on larger sites and promotion of smaller green field sites and the relationship between housing and economic growth). These matters are addressed in the statement on the Strategy for Development.

Key Issue 5 - Improving Existing Communities

- Detailed comments were made in relation to the development of brownfield sites particularly in rural areas and the relationship between housing and town centre growth. These objections relate to policies CS13, CS34, CS32, and are addressed under these policies.
- Is there provision for the expansion of out of town centres and new district centres if they are needed?

Key Issue 6 – Tackling Congestion and Improving Accessibility

- The Core Strategy should acknowledge the role of developer funding in providing highway improvements
- The key role of central government funding for infrastructure should be acknowledged.

Key Issue 7 – Managing Environmental Resources and Heritage

- Refer to broader historic environment in line with PPS5 and include reference to the protection of locally important assets
- Issue should be worded more flexibly as development can be achieved sensitively without undermining environmental assets.
- Detailed comments about the implementation of policies.

Key Issue 8 – Improving Health and Wellbeing

- No objections and two supporting statements were received on this issue.

Response

General

The relevant objectives are already identified at the beginning of each chapter so another matrix is unnecessary.

Key Issue 1 – Reducing and Adapting to Climate Change

The Core Strategy's overall aim of securing sustainable development and its policies relating to climate change will have an impact on the related issue of peak oil and the likelihood of higher oil prices. These policies, and the Core Strategy's overall approach, should contribute to reducing reliance on oil. Wording could be added to give greater recognition to this issue.

Key Issue 3 – Maintaining Economic Prosperity

Evidence demonstrates that there are approximately twice as many jobs as resident workers in the North Fringe of Bristol and so there is no justification for additional allocation of employment land in this area. The strategy for Thornbury is to make more efficient use of existing employment land to provide jobs to maintain the current ratio which is around one job per resident worker.

The Council agrees that the development of skills is important in ensuring economic prosperity for the residents of South Gloucestershire. As a spatial plan, the Core Strategy recognises the importance of this issue. The need to take opportunities to provide training for residents of priority neighbourhoods has been particularly identified in the partnership priorities in Part 2 of the Core Strategy. Wording could be added to reflect this approach.

Key Issue 5 - Improving Existing Communities

The issue of providing for new district and out of town shopping facilities is addressed in Policy CS14 and will be supplemented by more detailed policies in the Sites & Policies DPD.

Key Issue 6 – Tackling Congestion and Improving Accessibility

The causes of traffic growth and congestion are complex and subject to debate. It is considered that the current wording is appropriate in describing the key issues. The approach to funding future infrastructure will be set out in Policies CS7 and CS8.

Key Issue 7 – Managing Environmental Resources and Heritage

The Council agrees that the broader historic environment including local assets should be reflected in the wording of this key issue. However, the introduction of more flexible wording would not aid the understanding of this issue.

Detailed issues about implementation will be covered under Policy CS9 or in subsequent DPDs.

Other comments related to raising the profile of air quality in the Core Strategy to negate the impact of development on existing air quality (and the impact of existing air quality on any development) and two amendments to Key Issues 7 & 8 have been added to address this.

Issues Diagram

Objections were received regarding the wording of Sustainable Community Strategy Priorities. These are taken from an adopted document and cannot be changed by the Core Strategy.

Proposed Change – PC23 – PC28

Chapter 4 – Vision, Strategic Objectives and Strategy for Development

a) Vision

Vision for 2026 and beyond

5 objections and 8 statements of support were received to the overall Vision for South Gloucestershire. Statements of support were received from Natural England, UWE, the Highways Agency and developers.

The main issues raised by Friends of the Earth and Sustainable Thornbury related to the inclusion of adaptation to peak oil and suggestion to add climate change mitigation to the text. The other objections related to the strategy for development, which is covered later in this report.

Response

The Council considers that no change to the overall vision is required as climate change mitigation is included as a cross-cutting objective rather than part of the Vision. A reference to peak oil and resource depletion is considered more appropriate in the Key Issues – see recommendation in the Key Issues above at Chapter 3.

Vision for the North Fringe

1 objection and 6 statements of support were received. Avon Wildlife Trust suggested including the natural environment as a key theme within the vision.

Response

It is considered that the articulation of the need to protect and enhance open spaces could be further strengthened in the Vision (see response to Policy CS25).

Vision for the East Fringe

6 objections and 1 statement of support were received which referred specifically to the vision for the communities of the East Fringe of Bristol. One objector made the point that the vision will only be achieved if development is sympathetically controlled and the Green Belt protected, yet other objections were connected to the locational strategy for the area by those promoting development in the Green Belt.

Further objections considered that the vision should include more ambitious plans for improving the management and access to green space including Commons management plans, more public access and reforestation. Avon Wildlife Trust suggested amended wording to include references to wildlife and climate change.

Response

It is considered that Policy CS2 Green Infrastructure outlines the components and benefits of Green Infrastructure, including its importance in respect of wildlife and of climate change adaption and mitigation. It is not considered that adding further references to wildlife and climate change in the Bristol East Fringe vision is necessary.

Vision for Yate and Chipping Sodbury

The Vision in general was supported by those responding to the Core Strategy. 5 objections and 2 statements of support were received which referred specifically to the vision for Yate and Chipping Sodbury.

The promoters of the land north of Brimsham have submitted representations that have requested alterations to the final sentence in order to provide clarity about the mix of uses and the purpose of housing development; namely that it will meet locally generated housing requirements. Additional sites were put forward for allocation and the developers of these sites have requested that the Vision be altered to reflect the ability of their sites to come forward.

Response

The Council does not consider that any changes are necessary in respect of identifying additional sites. The submission from the north Yate new neighbourhood developers does improve clarity and more accurately describes the content and aspiration for the new neighbourhood, in particular ensuring that a sustainable community is delivered. An amendment has therefore been suggested to the final sentence of the Vision.

Vision for Thornbury

Most representations received specifically related to proposed housing development at Park Farm, with many respondents doubting that housing development will solve the challenges facing Thornbury. Sustainable Thornbury do not think that the vision as drafted will encourage Thornbury's self containment.

Response

It is not considered that a change to the vision is necessary as this is considered to reflect the key challenges and objectives for Thornbury. However, reference should be made to the requirement for any housing to be of high design quality in order to take account of ecological and heritage assets.

Vision for Severnside

Comments received suggested that a stronger emphasis should be made regarding power generation, while others objected to the inclusion of any reference to power generation. It was also suggested that a change should be made to the text in relation to ecology issues in order to improve clarity.

Response

The Council considers that there should be no change to the reference regarding power generation. However amendments in relation to ecology issues and making stronger reference to partnership working with Bristol City Council should be made.

Vision for the Rural Areas

A statement of general support for the vision was received from an elected member. 5 representations from developers/agents and 1 environmental interest body were made specifically objecting to the vision. All matters raised by the developers/agents are also the subject of representations to the strategy of the Core Strategy and Policy CS34 (Rural Areas).

The representations consider:

- That the vision is unnecessarily prescriptive, restricts new development in the rural areas and should make reference to groups of associated settlements and providing housing to create sustainable communities (the representations seek to allow development of specific identified sites not related to local need).
- Reference should be made to the development of renewables being caveated by the constraints such as biodiversity, heritage and the unique character of the countryside.

Response

Representations relating to the strategy for the Rural Areas are considered in the response to the Strategy for Development later in this document.

The vision has been prepared taking into account engagement feedback. Key outputs of the engagement were that new development in the rural areas should provide development for local needs, local people should have more control of what development is provided, new development should be proportionate in scale to rural settlements and that the valued and unique aspects of the countryside and the built environment should be conserved.

It is considered that the vision reflects the Coalition Government's Localism agenda and given this context, it is not considered appropriate to amend the vision to take into account the developers objections.

There is extensive government guidance regarding consideration of impacts from renewable energy installations of all types. In addition, the Core Strategy also contains policies which cover the issues identified and the Core Strategy should be read as a whole. It is therefore not necessary to include caveats within the vision with regard to the development of renewables.

It is not considered that a change should be made to the Vision for Rural Areas.

Proposed Change – PC29 – PC32

b) Strategic Objectives

The following summary includes representations made to the Objectives, either where set out in Chapter 3 or in the various policy chapters in Part 1 of the Core Strategy (chapters 5-10).

19 objections and 8 statements of support were received in relation to the Objectives. The objections were mainly from developers, interest groups and statutory

consultees including English Heritage, Friends of the Earth, Friends of Bristol Suburban Railways and the Coal Authority.

Overarching & Cross-cutting Objectives

- Include reference to rising oil prices
- Add “and more affordable” to sustainable communities objective

Tackling Congestion and Improving Accessibility

- Add new objective concerning the re-opening of various train stations
- Remove “bus” from Bus Rapid Transit
- Cyclists and pedestrians should have priority over motorists

Managing Future Development

- Include securing the re-development of brownfield land as a new objective
- Objectives are at odds with the objective to protect the Green Belt and countryside
- Add new objective on providing sufficient new housing to meet need and demand and to support economic growth
- Add new objective to allow further housing in villages with higher levels of services and facilities

Managing Environmental Resources and Built Heritage

- Use broader definition of the historic environment than “built”
- Add new objective to protect best and most versatile farmland from development.
- Add safeguarding mineral resources as an objective

Providing Housing and Community Infrastructure

- Replace “Providing a range of housing” with “providing sufficient housing”

Other objections were concerned with the implementation, rather than the wording of the objectives, and raised issues covered in other summary reports. One objection promoted the inclusion of a definition for sustainable development.

Response

A number of objections proposed to the Objectives were, in effect, seeking changes to the strategy for development. These issues are considered later in this report.

A reference to the depletion of oil and higher oil prices has been recommended in the Key Issues section. It is considered that the transport proposals in the Core Strategy do reflect the Joint Local Transport Plan.

Some minor wording changes have been made to the objectives on “Managing Environmental Resources and Built Heritage.” It is considered that protecting the best and most versatile farmland is covered under the objective of safeguarding the quality of natural resources and ensuring their prudent use; and reference to pollution and air quality in the objectives has now been made.

Proposed Change – PC33 – PC34

c) Strategy for Development

This summary relates to representations made to:

Chapter 1, paragraphs 1.10 - 1.13 & 1.35 -1.40;

Chapter 4, paragraphs 4.3 - 4.29;

Chapter 6, Policy CS5 – Location of Development & paragraphs 6.5 - 6.11; and

Chapter 10, Policy CS15 – Distribution of Housing & paragraphs 10.6 -10.11.

A total of 253 objections and 29 statements of support were made to various aspects of the Strategy for Development as expressed in Chapters 1 and 4 and in Policies CS5 and CS15. However, there is an amount of double counting in the objection numbers, as a significant proportion of objectors made the same comments each time the Strategy was referred to in different sections of the Core Strategy. These objections also duplicate many of the objections which have been recorded for the individual area chapters in Part 2 of the Core Strategy (Chapters 12 – 18).

This section is presented in 2 parts; the first dealing with the strategic issues raised and the second to more detailed objections.

The spatial breakdown of these comments is:

Overall Approach of the Strategy	137 obj	18 sup
North Fringe	24 obj	1 sup
East Fringe	16 obj	4 sup
Yate/Chipping Sodbury	22 obj	0 sup
Thornbury	17 obj	5 sup
Rural Areas	27 obj	0 sup
Sevenside	10 obj	1 sup

While comments on the strategy were made by a cross section of interests, including members of the public, the greatest numbers of comments were made by developers, landowners and agents. A number of objections have been moved to be dealt with in the area chapter summaries, as they raise issues that are not specifically related to the strategy.

Part 1 – Strategic Issues

Overall Approach of the Strategy

The objections to the overall approach to the Strategy for Development covered the following issues:

- The strategy is premature – it doesn't reflect the Coalition Government's policy on the protection of Green Belt, the localism agenda and the revocation of the RSS;
- Housing figures are too high – Housing numbers should be reassessed with new evidence and consultation – the economic situation has changed and there is no guarantee of transport infrastructure improvements to support these numbers. Local need should be used as the indicator of required provision;
- Housing figures are too low - various alternative figures up to 34,000 suggested. Policy CS15 doesn't fulfil the requirements of PPS3. The strategy does not deliver a 5 year supply of housing land;

- There is an over-reliance on major sites which may have delivery issues. The strategy should include more, smaller sites which are deliverable including green field/Green Belt sites;
- Concern about the impact of the removal of green field land inside motorway network on quality of life, biodiversity, etc;
- The strategy should not just focus on first 10 years;
- Object to references to unidentified brownfield as part of 5 year land supply and windfalls post 2022;
- Object to building on the Green Belt;
- Any incursion into the Green Belt should occur only where special circumstances can be demonstrated and the strategy should compensate for land taken out of the Green Belt by taking other land in;
- There is inconsistency between how different areas of South Glos are treated with regard to Green Belt;
- More land should be released from the Green Belt to ensure that a sufficient quantum and range of development opportunities exists. It is inconsistent with national policy to consider large Green Belt sites without considering smaller sites and to minimise the need to adjust Green Belt boundaries;
- The strategy should include a commitment to review Green Belt, setting timescale and parameters. Any review must:
 - Include land west of M5 including Over and Easter Compton
 - Enable further contribution towards balancing employment needs across the district e.g. expansion of Hanham Business Park
 - Allow for affordable housing sites to be identified on the edge of rural settlements in Sites & Policies DPD;
- Lack of evidence to support housing numbers;
- No testing of alternative growth strategies;
- There is insufficient evidence on planned infrastructure to support new development e.g. JLTP3 is not ready;
- There is no flexibility to allow for significant delays in development of the major sites this will result in a shortfall of provision;
- Question realistic delivery of sustainable development with some proposals;
- No evidence is provided to support delivery of the SGLP allocations given viability issues;
- The Strategy is inconsistent with what is said in the last sentence of para 4.4 due to reliance on significant public infrastructure and the release of land from the Green Belt before development can take place.

Response

The Council considers that the need to provide new housing in South Gloucestershire is closely related to the economic prosperity of the area. Work on the RSS was largely carried out five or more years ago and in very different circumstances. It is clear that the economic forces driving many of the assumptions that underpinned the RSS have now changed. The Strategy for Development set out in the Core Strategy is justified in the light of the reduction in economic growth rates which started with the banking crisis in 2008/9. This was taken into consideration in preparing the Draft Core Strategy and remains relevant now given the Coalition Government's programme of austerity and deficit reduction measures put in place since May 2010.

In this context, the Strategy for development sets out the amount and locations for growth which will achieve the Plan's overall vision. It has been developed through a sound process which has involved continuing consultation with communities and

other partners and gathering supporting technical evidence. The Strategy has been subject to Sustainability Appraisal to ensure that the most sustainable choices have been made. As a result, the Strategy reflects the fundamental place shaping principles that express the objectives of the Council, our communities and partners to deliver sustainable communities as follows:

- Recognises the importance of maintaining the strong character and identity of existing communities and places;
- Respects the quality of the environment and heritage and recognises that this poses significant constraints on future development;
- Ensures a prosperous economy;
- Prioritises infrastructure investment which supports high level spatial objectives and the realisation of the ambitions of local communities;
- Supports the protection of the Green Belt;
- Establishes a policy framework for cutting carbon emissions and responding to climate change;
- Identifies locations for future development which align to the objectives and priorities of the Council Plan and Sustainable Community Strategy and partnership working;
- Identifies development which can be delivered in the timescale of the Core Strategy.

The Council is not proposing to make changes to the Strategy for Development as a result of responses to the Draft Core Strategy, except to update the Plan to reflect factual changes and changes to national policy.

Strategy for the North Fringe of Bristol urban area

The objections to the approach to the North Fringe of Bristol urban area covered the following issues:

- Post 2016 proposals for Cribbs and Harry Stoke may have direct implications for the strategic road network as well as services and facilities in existing communities;
- Allocate land east of M32 and north of A4174 at Hambrook;
- Strategy takes no account of decision on Frenchay Hospital.

Land East of Harry Stoke

- Land East of Harry Stoke should not be dependent on delivery of the SGTL ;
- If the land for the SGTL fulfils a Green Belt function, then an alternative route should be sought (paragraph 4.17) ;
- There is no rationale for phasing restriction on land East of Harry Stoke.

Cribbs/Patchway

- Object to any phasing that would preclude development of Cribbs/Patchway before 2016 (IDP shows phasing commencing 2013);
- No evidence to demonstrate that need for land to west of A4018 at Cribbs will only arise after 2020 and does not accord with para 2.12 of PPG2 in that Green Belt boundaries may need to be altered during or at the end of the plan period;
- Object to possible removal of Green Belt west of A4018 and affect on setting of Spaniorum Hill.

Response

The Council's overall approach to development is in the response to the overall approach of the Strategy and in the Core Strategy Sustainability Appraisal. More detailed issues raised in relation to the North Fringe of the Bristol Urban Area are addressed in responses to CS25 – Communities of the North Fringe of Bristol Urban Area, CS26 – Cribbs / Patchway New Neighbourhood and CS27- East of Harry Stoke New Neighbourhood.

Strategy for the East Fringe

The objections to the approach to the East Fringe of Bristol urban area covered the following issues:

- No justification for removing proposal for an urban extension in this area. Reference should be made to the Colin Buchanan Strategic Green Belt Review which identified an Area of Search for an urban extension north east of Greater Bristol (part of RSS evidence base);
- Urban extensions or smaller developments within the Green Belt proposed at:
 - Shortwood Golf Course
 - Hanham
 - Barry Road Oldland
 - Williams Close, Longwell Green
 - Bromley Heath (employment land);
- Latest assumptions for Emersons Green East are 3,050 dwellings and 19ha employment land not 2,750 as stated in the Draft Core Strategy.

Response

The Council's overall approach to development is in the response to the overall approach of the Strategy and in the Core Strategy Sustainability Appraisal. More detailed issues raised in relation to the East Fringe of the Bristol Urban Area are addressed in responses to CS29 – Communities of the East Fringe of Bristol Urban Area.

The Council agrees that the latest planning applications at Emersons Green East are for 3,050 but the details are subject to changes.

Strategy for Yate & Chipping Sodbury

The objections to the approach to Yate and Chipping Sodbury covered the following issues:

- Object to 3,000 houses now that the RSS has gone;
- Include more housing at Yate/Chipping Sodbury;
- The 3,000 houses proposed at Yate should be spread around towns and villages in South Gloucestershire for affordable housing and elderly only;
- Object to omission of land:
 - East of St John's Way, Chipping Sodbury
 - Engine Common
 - North Yate (Home Farm);
- Proposed phasing of housing at north Yate is unachievable;
- Allow delivery before current timescale;
- Amend reference to new sewer connection (paragraph 4.24).

Response

The Council's overall approach to development is in the response to the overall approach of the Strategy and the Core Strategy Sustainability Appraisal. More detailed issues raised in relation to Yate & Chipping Sodbury are addressed in the responses to Policies CS30 – Yate & Chipping Sodbury and CS31 – north Yate New Neighbourhood.

Reference to sewerage connection in paragraph 4.24 is with regard to the requirement to secure the strategic sewerage infrastructure to enable the whole development to take place. Proposed phasing is consistent with the Plan's overall vision and strategy for development. In the period up to 2026 the Core Strategy identifies 2,400 dwellings in the New Neighbourhood.

Strategy for Thornbury

The objections to the approach to Thornbury covered the following issues:

- Object to 500 new houses in Thornbury - development should be based on meeting local needs, both market and affordable;
- Thornbury needs more housing - minimum 750 and up to 1,000 houses required;
- Any new housing should be spread over several smaller sites. Sites proposed at Morton Way South and within the Green Belt at Bristol Road as well as at Park Farm;
- Object to revitalising the town centre as a justification for new housing at Thornbury;
- Support strategy for achieving more self-containment, but some of the features of Policy CS32 will not achieve it e.g. need to address why existing residents don't use town centre enough;
- Park Farm housing can be delivered sooner than identified in Policy CS15.

Response

The Council's overall approach to development is in the response to the overall approach of the Strategy and in the Core Strategy Sustainability Appraisal. More detailed issues raised in relation to Thornbury are addressed in responses to Policies CS32 - Thornbury and CS33 - Housing Opportunity Area.

Strategy for the Rural Areas

The objections to the approach to the Rural Areas covered the following issues:

- Settlement boundaries should be reviewed now not in 5 years – they are historic and are preventing an adequate supply of rural housing including affordable housing. Some rural communities without boundaries are prevented from having any new development;
- Policy should identify new development in some villages or groups of villages where there are facilities and services. Development should assist in creating sustainable communities or sustain existing communities;
- Existing rural settlements should be increased by 15/20% through sympathetic extensions. Remove reference to “small scale”;
- Specific sites identified as locations for growth (Charfield and Coalpit Heath);
- Allow small scale sites in rural areas to come forward in current economic climate to compensate for delivery issues which are affecting larger sites;

- Development must be for local needs only and not add to existing congestion on strategic road network.

Response

The Council's overall approach to development is in the response to the overall approach of the Strategy and in the Core Strategy Sustainability Appraisal. More detailed issues raised in relation to the Rural Areas are addressed in responses to Policies CS34 - Rural Areas.

The policy and supporting text has been prepared taking into account engagement feedback. Key outputs of the engagement were that new development in the rural areas should provide development for local needs, local people should have more control of what and where development is provided, new development should be proportionate in scale to rural settlements and that the valued and unique aspects of the countryside and the built environment should be protected and conserved. It is considered that the policy reflects the Coalition Government's Localism agenda in that it enables local communities to take a proactive and leading role in identifying the type and location of new development.

The five year timescale identified in the Core Strategy for undertaking a review of the distribution of development, includes time to undertake work with rural communities/evidence gathering and preparation of policy framework and further engagement/consultation during the preparation of the Sites and Policies DPD. Land supply evidence confirms that there are a considerable number of planning permissions for residential development in the rural areas (approximately 650) and therefore development will not cease during the five year period and further development under Policy H2 of the Local Plan can continue during this period.

It should be noted that this policy was written before the Coalition Government's initiative "the Community Right to Build" was proposed. Communities with a 75% vote in favour of a development (that is 75% of those who voted) will be able to build without planning permission. It may be necessary to reconsider the wording of Policy CS5 once further details are provided in the Localism Bill/Act. A minor change to the supporting text is recommended to this effect.

Strategy for Severnside

The objections to the approach to Severnside covered the following issues:

- Clarify why new link road and M49 Junction are in the Core Strategy when not in Draft JLTP3;
- Objective to deliver principally warehousing and distribution operations is overly restrictive and contrary to Policy EC2.1b of PPS4.

Response

The Council's overall approach to development is in the response to the overall approach of the Strategy and in the Core Strategy Sustainability Appraisal. More detailed issues raised in relation to Severnside are addressed in responses to Policies CS35 - Severnside.

The Council believes that the link road is necessary to realise the full potential of Severnside and should be delivered as part of the development (see paragraph 17.17). The Core Strategy recognises the suitability of Severnside as a strategic location for warehousing and distribution uses. Delivering the strategy for Severnside will enable other appropriate land uses thereby unlocking the area's longer term strategic employment potential.

Major Infrastructure Projects

The objections to the approach to Major Infrastructure Projects cover the following issue:

- Include in text that strategy does not take into account potential new nuclear power station development at Oldbury on Severn

Response

Chapter 18 has been updated to reflect current circumstances and provide a stronger policy framework to assess the impact of major infrastructure projects in general and Oldbury Power Station in particular.

Part 2 - Detailed points and non-strategic matters

In addition to the above, objections have been raised to the detailed wording of the Strategy for Development sections of the Core Strategy. In some cases these points are more appropriately addressed in other sections of the Core Strategy. However, as a result of these comments changes to the wording to provide factual updates or clarification are proposed as follows:

- Para 4.5 - add reference to green infrastructure;
- Amend paras 4.21 and 4.22 to clarify reference to transport infrastructure and the approach to the Green Belt in the East Fringe of Bristol urban area;
- Para 4.23 Add reference to environmental, heritage and transport constraints at Chipping Sodbury;
- Para 4.26 – add reference to the international, national and local importance of Severnside for biodiversity;
- Amend policy CS5(4) to refer to the provisions of the Habitats Regulations.

The Coal Authority objected that the strategy may result in the sterilisation of surface coal resources and that policy CS5 should indicate that prior extraction should be a consideration for development proposals which come forward within this resource area. However, it was considered that the potential impact on the strategy for development and existing communities outweighs any potential benefit arising from coal extraction.

Subject to the adoption of the Core Strategy, policy H2 of the SGLP will be deleted and replaced by policy CS5 as a result there will be a consequential change required to the Proposals Map, this is set out in the 'Schedule of Changes'. Part Two policies set out new growth areas, there is therefore a need to redefine the Settlement Boundaries at East of Harry Stoke and North Yate, these Proposals Map changes are set out in the 'Schedule of Changes'.

Proposed Change –

Chapter 1, paragraphs 1.10 - 1.13 & 1.35 -1.40: PC9 & PC15 – PC17

Chapter 4, paragraphs 4.3 - 4.29: - PC35 – PC43

Chapter 6, Policy CS5 – Location of Development & paragraphs 6.5 - 6.11: - PC61 – PC62

Chapter 10, Policy CS15 – Distribution of Housing & paragraphs 10.5 -10.11: PC108 – PC112

Policy CS1- High Quality Design and paragraphs 5.1- 5.18

44 objections and 6 statements of support were made to Policy CS1 and the supporting text. The majority of objections were made by developers, agents and interest groups.

Three objections considered the policy to be too long, complex and onerous. All other objections related to issues of emphasis or were of a minor technical nature. The main technical issue raised was related to sustainable construction standards. Members of the public and pressure groups generally seek higher standards, whilst development industry representatives are seeking greater flexibility and viability to be taken into account.

Other points made included:

- The need for greater clarity of what constitutes 'a scheme of sufficient scale or significance' – criteria 4;
- Whether 'fresh, contemporary' design should be encouraged;
- The need for greater flexibility with regard the retention of existing features – criteria 3;
- Why is Building for Life 'very good' only promoted on sites of more than ten dwellings?; and
- Could small-scale development contribute to public art objectives?

Response

Policy CS1 is a key policy that applies good design practice and the Council therefore considers that it is neither too long, complex nor onerous.

With regard sustainable construction (criteria 8 & paragraph 5.11), PPS1: Climate Change Supplement promotes high sustainable construction standards on a site-by-site basis where local authorities can demonstrate viability and no undue burden on other objectives of the plan. Local Members recognise this but note that there were no in principle objections to the policy as stated. It is therefore considered that the balance is about right and the policy is deliverable. Members, also consider it prudent to review the policy through the proposed review of the Design Checklist SPD and Sites and Policies DPD. Members also recognise the need for wider corporate action to assist developers meet their CO2 reduction obligations over the coming years.

In order to ensure that the design policy is 'locally distinctive' it is intended that the local SPD and other design related guidance (criteria 4) is taken more account of in day-to-day Development Control (DC) decision making. However, it is not possible to define a size threshold above which development should be required to take on board such guidance, due to the varied nature of the guidance and possible development impacts. Some guidance is provided in paragraph 5.6 of the Core Strategy on the expected approach to this effect.

PPS1 specifically requires that Local Authorities do not specify architectural styles (be it 'fresh and contemporary' or otherwise) at such a generic strategic level. A preference for such architectural style should be pursued at the site level, through Concept Plans, SPD and planning applications etc.

Day-to-day Development Control implicitly includes some flexibility in the consideration of the need to remove, replace or mitigate existing site features where appropriate.

It is generally accepted in the industry that the Building for Life criteria can be problematic on small sites, (hence why a threshold of 10 dwellings is proposed) as criteria tend to lend themselves to assessments of 'streets,' rather than individual dwellings, and in rural locations, because a number of points are achieved by being located near to amenities and public transport etc. A 'small sites scoring methodology' based on Building for Life is therefore proposed through the review of the Design Checklist SPD.

Contributions from small developments towards public art would be best pursued through CIL or a local tariff based approach to planning gain. The provision of public art will be a key indicator of good design (BfL criteria) and should be seen as an opportunity to involve the local community in support of Sustainable Community Strategy objectives.

Proposed Changes – PC44 – PC50

Policy CS2 – Green Infrastructure, paragraphs 5.19 – 5.34, Figure 1 and Appendix 3 – Green Infrastructure Assets

20 objections and 7 statements of support were made in relation to Policy CS2, the supporting text and appendix 3. The main issues raised were for noting, minor amendments and suggestion to improve clarification. The majority of responses were therefore not suggesting significant policy changes, comments were received from The Woodland Trust, developers, Parish Councils, Housing Associations, individuals, the Environment Agency, the Wildlife Trust, the Forestry Commission, Sport England and English Heritage. Supportive statements were received from Natural England, the Wildlife Trust, developers, the Joint Local Access Forum, Parish Councils and British Waterway.

The main points from the representations were:

- The inclusion of more detail on woodland protection and creation.
- The expansion of the policy to recognise the role of private gardens.
- Recognition of the importance of access to the foreshore.
- Clarity was sought on the scope and status of the Green Infrastructure Strategy.
- Include the protection of agricultural land.
- Include of a supportive statement on local food production.
- The Environment Agency commented that this is a good policy, but would benefit from additional detail regarding SUDS/flood storage.
- Question over the purpose of referring to Strategic Principal Functions, as it added very little to the policy.
- Request to add reference to geology / geomorphology, to better reflect the scope and potential of the concept of Green Infrastructure.
- Request to add reference to 'natural and built' heritage features, to improve consistency with other parts of the Core Strategy and with PPS5.

- Include reference to air quality as a benefit and objective of green infrastructure.
- Unclear what the purpose is for including Figure 1 – the scope appears to be beyond that of the planning system.
- An important benefit should be made clearer in the policy that of enabling communities access to semi-natural habitat on their doorstep.

Response

The supportive statements received justify the inclusion of this important policy within the Core Strategy. Minor amendments that improve the clarity of this policy and supporting text have been made. Additional detail, such as that suggested by the Environment Agency and those relating to woodland will be reflected in the Green Infrastructure Supplementary Planning Document.

The Council considers that the wording relating to 'strategic principal functions' is superfluous and therefore has removed it in order to make the policy more concise.

Proposed Changes – PC51 – PC58, and PC250

Policy CS3 – Renewable and Low Carbon Energy Generation and paragraphs 5.35-5.43

20 objections and 3 statements of support were made to Policy CS3 and the supporting text. Just under half of the objections were received from Parish Councils and individuals. The rest were made up of interest groups and agents.

The main concerns raised were that the policy was not specific enough with regard the need to take into account issues of noise, and impacts on wildlife, landscape and cultural heritage. Other comments were of a minor technical nature or promoted sites for renewable energy generation.

Response

Planning Policy Statements 1 (Climate Change Supplement) and 22 (Renewable Energy) and their supporting guidance notes set out extensive guidance with regard the consideration of impacts from renewable energy installations of all types. Many renewable energy installations also fall under the EIA regulations. It is therefore not necessary to repeat such guidance in Core Strategy policy. The Sites & Policies DPD is the appropriate document to consider site specific allocations.

Criteria 2 of CS3 and paragraph 5.37 gives significant weight to schemes that provide community benefit from the sale of heat and electricity. The policy is worded to encourage both communities to seek such opportunities and developers to see the advantages, (i.e. in terms of a quicker permission, by working with local communities in promoting such an approach). Implementation of a policy that required such benefit from all renewable energy installations would require the 'community' to be defined in each case and may prove problematic where there is no such easily identifiable organisation / group to manage the proceeds. It may be more appropriate for the Council's Sustainability Team to assist and educate Parish & Town Councils and other groups to the mechanisms and potential for realising

'community benefit' from Renewable Energy installations, therefore becoming more pro-active and engaged in their delivery.

Proposed Changes – PC59

Policy CS4 – Renewable and Low Carbon District Heat Networks and paragraphs 5.44-5.52

14 objections and 2 statements of support were made to Policy CS4 and the supporting text. All representations received were from developers, agents and interest groups.

The main issues raised were:

- One objection essentially questioned the need for a 'technology specific' policy given the pace of change in this area,
- One objection sought to strengthen criteria 8 of the policy.
- The remainder of the objections suggested that the policy is insufficiently flexible and doesn't take account of financial viability.

Response

Heat distribution networks remain one of the most efficient means of achieving CO2 reduction targets. It is known that developers of strategic sites in South Gloucestershire are investigating this technology as a means to meeting their CO2 reduction obligations. The primary purpose of the policy is therefore, to ensure developers continue to investigate the potential by searching for off-site sources of heat or potential additional heat customers. In this way, viability can be improved and networks built up. Paragraph 5.47 explains that 'economic' feasibility will be taken into account where developers propose alternative methods of heating.

Proposed Changes - No change required.

CS5 - Location of Development – see Chapter 4 c) – Strategy for Development above

Policy CS6 - Infrastructure and Developer Contributions and paragraphs 6.12-6.18

27 objections and 9 statements of support were made to Policy CS6 and the supporting text. Almost all representations were made by developers, agents and interest groups.

The main issues raised were:

- The main objection from developers and planning consultants was that the policy should clearly be in accordance with Circular 05/05, i.e. contributions should be necessary, related and reasonable.
- Developers and planning consultants also wanted clarification as to whether South Gloucestershire intends to implement a Community Infrastructure Levy (CIL).
- Other objections generally related to specific interests, i.e. the Highway Agency seeking specific acknowledgement of the Strategic Road Network in the list of infrastructure items (para 6.13), Wessex Water seeking scope for contributions towards upgrade of the strategic sewer network and RSL's seeking to exclude affordable housing from contributions.

Response

Circular 05/05 concerning the application of planning obligations is applicable in any case and does not need to be repeated in the policy. CIL is acknowledged in paragraph 6.18 but the new government have indicated their intention to review CIL. The policy and its explanation does not exclude the possibility of contributions to the Strategic Road or sewer network. Policy CS18 relates to affordable housing.

Proposed Changes - No change to policy required.

Policy CS7 – Strategic Transport Infrastructure and paragraphs 7.1-7.14

54 objections and 13 statements of support were received in relation to Policy CS7 and the supporting text. Approximately a third of the objections were received from Parish Councils and individuals raising concerns about the impact of development, transport proposals, and effects of congestion.

Objections included:

- The Highways Agency and GOSW were seeking information with regard the impact of development proposals (particularly in the North Fringe) on the Strategic Road Network.
- A lack of emphasis on rail and the potential to re-open local stations;
- Promotion of non-planning powers such as the creation of an Integrated Transport Authority (ITA) and smart ticketing;
- Question marks over the deliverability of transport packages given the impending spending reviews;

- Clarification as to whether the M4 Link and M49 jct are aspirations or part of the plan; and
- Concern that the ring road package will merely exacerbate car use.

Response

The Council is working with developers of the new neighbourhoods to understand local and strategic highway impacts through Concept and Master Planning processes. The Highways Authority have, and will continue to be invited to participate in those discussions.

The rail proposals are consistent with Network Rail's Great Western Route Utilisation Strategy and focus on improvements to the existing network infrastructure (e.g. improvements at Yate station) and enhancement of local services (e.g. the Greater Bristol Rail Metro major transport scheme).

The West of England authorities are focussing on making the current joint arrangements (through the Joint Transport Committee). The transport work that benefits from joint working by the Councils includes:

- a. Planning & implementing cross-boundary transport plans and investment.
- b. Working with bus operators to improve service quality.
- c. Working to obtain improvements in the quality of Rail Services & the strategic roads network
- d. Increasing local investment in transport.

The Joint Transport Committee remains concerned about the lengthy, extensive and costly preparation and planning required to establish and to run an Integrated Transport Authority (ITA). The West of England Partnership Board concluded that an ITA would offer no additional powers or functions to those of the Joint Transport Executive Committee could hold, and therefore the West of England Partnership has not opted for an ITA.¹

The authorities are jointly working on the development of smart ticketing, using £2.2m funding was awarded by DfT to 'create, or further develop ITSO integrated smart ticketing schemes'. It will also support any commercial ITSO smartcard scheme, and there is an expectation that it will provide a basis for regional initiatives.

Paragraph 7.3 - 7.4 makes clear that the packages will remain under review, subject to the availability of Central Government funding and negotiations with the private sector.

The M4 link and M49 junction remain long term aspirations hence they are not referred to in policy.

The Ring Rd Package would include complementary measures on relieved roads to capture decongestion benefits.

Subject to the adoption of the Core Strategy SGLP policy T1 will be deleted. As a result of the introduction of CS7 and the deletion of SGLP Policy T1 there are consequential changes required to the Proposals Map, these are set out in the 'Schedule of Changes'.

Proposed Changes – PC63 – PC68

¹ Source: position statement agreed by the West of England Board.

Policy CS8 – Improving Accessibility and paragraphs 7.15-7.22

16 objections and 3 statements of support were made to Policy CS8 and the supporting text. 6 objections were from Parish Councils and individuals.

Parking standards was the issue most commented on. Maximum standards were both supported and objected to. The reference to 50% of garages only contributing towards maximum standards was challenged as not being evidence based. Early review of parking standards was thus advocated. Other comments were locational specific or generally supportive. One comment requested that rail stations should be added to the list of destinations in criteria 3.

Response

Car parking standards are proposed to be reviewed as stated in new criteria 4 and paragraph 7.21-22.

Proposed Changes – PC69 – PC73

Policy CS9 – Managing the Environment and Heritage and paragraphs 8.1 – 8.17

24 objections and 13 statement of support were made to Policy CS9 and its supporting text.

The main points from the representations were:

- English Heritage suggested the use of a broader definition of the historic environment than simply 'built' features, in line with PPS 5, and also suggested the addition of a proactive policy to regularly revise the Local List SPD.
- The Environment Agency were broadly supportive of Policy CS9 and its supporting text although did raise a question relating to the consistency of paragraph 8.11 with the Policy relating to the Coastal Zone.
- The Coal Authority pointed out that at present the policy does not address any issues associated with ground stability which is a policy requirement of PPG 14 and on this basis suggested a new criterion be added to Policy CS9.
- The Cotswold Conservation Board, while generally supporting Policy CS9, suggested that reference should be made within the policy to further emphasise the need to protect tranquillity.
- The Avon Wildlife Trust noted that national conservation legislation and policy requires local authorities to protect and enhance the natural environment and, on this basis, suggested the wording of Policy CS9 should be strengthened. In addition, they felt that the supporting text should be amended to reflect national environmental planning legislation and policy
- The policy and supporting text relating to pollution (paragraph 8.15) should be added to/strengthened as pollution is an issue of strategic importance. Mention should be made of South Gloucestershire's AQMAs (designated April 2010).

- South Gloucestershire Council Labour Group considered that greater flexibility should be added in the wording of Policy with regard to the historic environment to increase the potential to bring protected buildings in a poor state of repair back into sustainable use.

Other points made included:

- The distinctive built and natural heritage of the area should be given greater recognition.
- The wording of paragraph 8.13 should be expanded from simply highlighting the importance of soil in itself to emphasise the importance of proactively managing soil for improvement.
- Buffer zones should be introduced for areas designated for conservation in order to further safeguard the protected areas.
- Paragraph 8.13 should be expanded to cover “suitable gardens”, e.g. “Land Share” garden schemes which will help people get suitable food out of these gardens.
- A number of responses related to detailed issues covered by existing the South Gloucestershire Local Plan policies which will be retained.
- Other responses related to points of clarification and the removal of any ambiguity in the wording of Policy CS9 and its supporting text.
- To change the title of the policy to ‘Valuing the Environment’
- A number of points require further clarification in order to reflect changes in national planning policy (i.e. PPS 5)

Response

As a result of comments received a number of changes and additions are necessary to be made to Policy CS9 and its supporting text.

The addition of a new criterion and supporting text to reflect issues relating to ground stability is suggested. In addition to this change, a new paragraph within the supporting text is suggested to allow for enabling development on buildings deemed by the Council to be at risk and to proactively revise the Local List of Buildings SPD. In addition to these changes, officer responses focussed around a need to strengthen and add emphasis to elements of Policy CS9 through the inclusion of additional technical information.

Aside from the additions suggested above, a number of amendments to the policy and supporting text, including the introductory text to this chapter, are necessary to improve clarity and ensure that it is consistent with national planning and environmental policy and legislation.

It is felt that, while the number of objections outweighs those representations in support, the intention to protect and manage South Gloucestershire’s heritage and environmental assets and natural resources in a sustainable manner is generally welcomed.

Subject to the adoption of the Core Strategy, SGLP Policy L3 will be deleted. As a result of the introduction of CS9 and the deletion of SGLP Policy L3 there are consequential changes required to the Proposals Map, these are set out in the ‘Schedule of Changes’.

Proposed Changes – PC74 – PC84

Policy CS10 – Minerals and paragraphs 8.18 – 8.24

4 objections and 3 statements of support were received in relation to Policy CS10 and the supporting text.

- The minerals industry were generally supportive of the policy.
- The Tortworth Estate wanted the Core Strategy to endorse the principle of transferring an old active mineral planning permission to a more suitable mineral working area.
- The Coal Authority were concerned that the shallow coal resource would not be safeguarded until the Sites and Policies DPD is produced.

Response

There is no national mineral planning guidance to support the principle of swapping mineral reserves. Such an approach would fall to be considered on an individual basis through negotiation over a planning application.

The Coal Authority has made a similar objection to Bristol's Core Strategy and agreed some textual wording to address their concerns. For consistency, a similar approach is advocated. Government guidance (MPS1) requires consideration to be given to prior extraction of minerals where they would be sterilised by non-mineral development. However, there are certain circumstances where this may not be appropriate and this is recognised in the current M&WLP policy on safeguarding (which will be replaced by a future policy in the Sites & Policies DPD). This policy rules out prior extraction where a) it would be impracticable or environmentally unacceptable, b) the land is already allocated for another use, or c) the need for a development overrides the benefits of prior extraction.

As indicated in paragraph 8.19, the Core Strategy will require amending to take account of the revised sub-regional aggregates guidelines for 2006 – 2020 provided these are agreed before December.

Proposed Changes – PC85 – PC89, PC252

Policy CS11 – Distribution of Economic Development Land and paragraphs 9.1-9.7

24 objections and 4 statements of support were made to the introduction to the Economic Strategy, Policy CS11 and the supporting text. Of these, only 1 was from a representative of the community, the remainder being developers.

Objections to the Overall Strategy for Economic Development Land

Regional Development Agency, GWE Business Link and other commercial interests objected that the strategy does not provide enough land in the right locations to meet the needs of business for the following reasons:

- The strategy would limit the economic potential of the sub-region.
- There is an over reliance on employment land at Severnside where key constraints will limit delivery.
- The proposed new neighbourhood at Cribbs/Patchway would have an adverse impact on Filton Airfield and the wider Aerospace industry and so employment land should be allocated around the airfield rather than residential.
- There is an over reliance on protecting existing employment land in the North and East Fringes of Bristol and so further land should be allocated in these areas.
- Questioned the quantum of safeguarded land in Yate & Chipping Sodbury given the uncertainty over the level housing provision now that the RSS has been revoked.

Site Specific Objections

A number of developers have made representations seeking the allocation of specific sites for employment land within the Green Belt and on green field land as follows:

- Land on the edge of Wickwar
- Land East of Chipping Sodbury
- Bromley Heath Road, Downend
- Land to the east of Bristol urban area
- Land at Engine Common

There were also objections to the safeguarding for economic development of various sites and these are discussed in the Council's response below.

Response

Objections to the Overall Strategy for Economic Development Land

The economic strategy and Policy CS11 reflects the strategy for development in Policy CS5 and set outs, in summary, the overall quantum and location of economic development land to be delivered through the Core Strategy. It is considered that the range of land safeguarded, provided within the mixed use allocations or in new neighbourhoods set out in this policy, is sufficient to provide for the future economic prosperity of South Gloucestershire and its role within the West of England sub-region. Allocating additional land would undermine the strategy for development and objectives of the Core Strategy.

New neighbourhoods and existing major allocations at Northfield and Emersons Green will provide significant new employment land and work is in hand with Bristol City to address the delivery issues at Severnside.

Masterplanning at Cribbs/Patchway new neighbourhood will enable the Council to consider the location of new residential and employment uses so as to minimise the impact on Filton Airfield and provide for the future of the wider aerospace cluster.

Site Specific Objections

Those additional sites promoted by developers as suitable for safeguarding under CS11 are located outside development boundaries on green field or Green Belt land and would not, therefore, be in line with the Core Strategy or strategy for development (see statement on the Strategy for Development).

Sites which objectors do not wish to be safeguarded for economic development are:

- **Cooper Works, Yate** - This is identified as an interim safeguarded site and will be reviewed in the Sites & Policies DPD as part of a comprehensive master-planning process.
- **Overall quantum of land safeguarded in Yate/Chipping Sodbury and New neighbourhood north of Yate** – Further analysis of economic need is taking place during the master-planning of the new neighbourhood north of Yate. Reference to provision of economic development land in the new neighbourhood should be changed to “up to 9 Ha”.
- **Hunts Ground Road, Parkway** - The site is identified for development as a Park and Ride site at Policy T3 of the SGLP. This proposal remains part of the major scheme bid for the North Fringe and there is currently no reason to change the policy position in advance of a strategic review and the transportation safeguarding should continue.
- **Land at Station Road/Bridge Road, Staple Hill** - The garage site in question is part of a larger area already safeguarded in the SGLP. The garage use falls within the definition of employment uses in PPS4 and it is appropriate that it should be retained for employment uses in an area where supply of such sites is relatively constrained.

Factual updates

The table for CS11 will require factual updating to reflect increased accuracy in mapping of the sites.

Proposed Changes – PC90

Policy CS12 – Safeguarded Areas for Economic Development and paragraphs 9.8-9.15

19 objections and 4 statements of support were made to Policy CS12 and the supporting text.

General Comments

Regional Development Agency, GWE Business Link and other commercial interests objected that the strategy does not provide enough land in the right locations to meet the needs of business for the following reasons:

- The strategy would limit the economic potential of the sub-region.
- There is an over reliance on employment land at Severnside where key constraints will limit delivery.
- The proposed new neighbourhood at Cribbs/Patchway would have an adverse impact on Filton Airfield and the wider Aerospace industry and so employment land should be allocated around the airfield rather than residential.

- There is an over reliance on protecting existing employment land in the North and East Fringes of Bristol and so further land should be allocated in these areas.

Members of the public and Parish Councils made representations supporting the safeguarding of existing employment land.

Detailed comments on the wording of policy and text were that the approach to offices should be clarified within CS12 rather than in the text, the tests set out in CS12 were not in line with PPS4 and that Gospel Halls should be considered appropriate on land safeguarded for economic development.

Site Specific Objections

Various developer interests objected to the safeguarding or allocation of the following sites under CS12;

- The Cooper Works, Yate,
- Hunts Ground Road, Parkway,
- Former Kleeneze Site, Hanham (A representation supporting this safeguarding was also received),
- Billington Structures, Yate,
- Station Road/Bridge Road, Staple Hill
- McBraida, Kingswood
- Amount of economic development land in Yate/Yate new neighbourhood

Proposals were made to safeguard **additional** green field or Green Belt sites at:

- Hanham Business Park extension;
- Harvey Shopfitters, Common Road, Hanham;
- Bromley Heath Road, Downend
- Land East of Chipping Sodbury
- Land East of Wickwar
- Land at Engine Common
- Land for rail freight infrastructure and access including land at Severnside, Westerleigh Sidings and Chipping Sodbury Station Yard.

Response

General Comments

It is considered that the range of land safeguarded, provided within mixed use allocations or in the new neighbourhoods, is sufficient to provide for the future economic prosperity of South Gloucestershire and its role within the West of England sub-region. Further significant employment growth in the North Fringe would not be in line with the Core Strategy objective of achieving more balanced communities. New neighbourhoods and existing major allocations at Northfield and Emersons Green will provide new land for economic development and work is in hand with Bristol City to address the delivery issues at Severnside. Masterplanning at Cribbs/Patchway new neighbourhood will enable the Council to consider the location of new residential and employment uses so as to minimise the impact on Filton Airfield and provide for the future of the wider aerospace cluster.

It is considered that CS12 as worded is in line with PPS4.

Gospel Halls do not come within the definition of economic development set out in PPS4 and reflected in the Core Strategy. However, they could be considered

appropriate under the existing tests set out in policy CS13 or as part of the review of interim safeguarded sites depending on the circumstances of the individual proposal

Site Specific Objections

Those additional sites promoted by developers as suitable for safeguarding under CS12 are located outside development boundaries on green field or Green Belt land and would not, therefore, be in line with the Core Strategy, strategy for development (see statement on the Strategy for Development). Policy CS7 sets out the Council's policy for safeguarding of land for rail freight.

Response to objections to safeguarding particular sites as follows:

- **Coopers Works Yate** - This site is interim safeguarded and will be reviewed in the Sites & Policies DPD
- **Former Kleeneze site, Hanham** - The Employment Land Study has shown a continuing need for employment land in this area and The Town Centres and Retail Study has indicated some scope new for retail floor space. It is appropriate that these issues be addressed through a plan led approach rather than through the development control process. Ideally a concept statement would be prepared to investigate issues and help to inform policy to be included in the forthcoming Sites and Policies DPD.
- **Hunts Ground Road, Patchway** - This site is identified for development as a Park and Ride site in Policy T3 of the SGLP. This proposal remains part of the major scheme bid for the North Fringe and there is currently no reason to change the policy position in advance of a strategic review and the transportation safeguarding should continue
- **Billington Structures, Badminton Road, Yate** - This site was included in the CS12 Table 1 but the site has similar circumstances to the Stover and North Road areas covered by interim safeguarding under Table 2. There is logic in redefining the southern area for interim safeguarding as part of an overall enhanced Western Gateway to Yate.
- **McBraida site** (extension to include land south of Francis way) - This would cover a valuable green corridor and it is not recommended that safeguarding is extended.
- **Renault Car Dealership Station Road/Bridge Road, Staple Hill** - The garage site in question is part of a larger area already safeguarded in the SGLP. The garage use falls within the definition of employment uses in PPS4 and it is appropriate that it should be retained for employment uses in an area where supply of such sites is relatively constrained.

Factual updates

Remove Morley Road Area from Table 1 to reflect existing residential planning permissions. Rename UWE to UWE/Hewlett Packard in Table 2 for clarity.

Subject to the adoption of the Core Strategy, SGLP Policy E4 will be deleted. As a result of the introduction of CS12 and the deletion of SGLP Policy E4, Policy E2 and the removal of Policy E1 designation at Stover Road, Yate, there are a number of consequential changes required to the Proposals Map, these are set out in the 'Schedule of Changes'.

Proposed Changes – PC91 – PC98

Policy CS13 – Non-Safeguarded Economic Development Sites and paragraphs 9.16-9.21

8 objections and 2 statements of support were made to Policy CS13 and supporting text.

There were two objections to the policy as currently worded from development industry representatives. Other points made were that the poorest quality employment land should be released for schemes with a significant proportion of affordable housing and that it should allow for Gospel Halls on economic development as sequentially preferable to mixed use or residential uses.

The Environment Agency requested that the policy should be amended to clarify that change of use to residential should only occur when appropriate in terms of flood risk, (in line with policy CS9).

Response

The Policy as worded is intended to maintain a balance between employment and residential uses across our communities. Allowing more flexibility would maintain the trend towards loss of employment land which has resulted in significant imbalances in some areas. It is considered that the current wording is not too onerous and allows sufficient flexibility to respond to individual circumstances. For response on Gospel Halls, see policy CS12.

Policy CS9: Environmental Resources and Built Heritage sets out the requirement for all new development in respect of avoiding areas of flood risk and does not need to be repeated in other Core Strategy policies. However, Policy CS13 may result in a change of use where flood risk would need to be reassessed and so it would be helpful to cross refer to Policy CS9 in the supporting text.

Proposed Changes – PC99

Policy CS14 – Town Centres and Retail and paragraphs 9.22 – 9.30

13 objections and 5 statements of support were made to Policy CS14 and the supporting text.

- Morrisons objected to the designation of Patchway as a District Centre due to the adverse impact on existing centres and food stores in the locality, particularly if an anchor food store comes to Patchway;
- The Trustees of Abbey Wood Retail Park considered that the Retail Park should be allowed a convenience food anchor store;
- The owners of The Mall objected to the very restrictive approach to new floorspace at The Mall/Cribbs Causeway and would like a town centre

identified in the Core Strategy, rather than deferred until after 2026, together with further comparison floorspace;

- The owners of Yate Shopping Centre objected to designation of a town centre at The Mall/Cribbs Causeway;
- Sainsbury's supported a new district centre at Sainsbury's/B&Q in Stoke Gifford, but consider that this should be identified before 2026;
- Other objections concerned matters of clarification, the application of retail policy and development management matters and comments on the list of Local Centres;
- University of the West of England supported the more flexible use of Abbey Wood Retail Park and the Sainsbury's/B&Q site at Stoke Gifford

Response

The Mall/Cribbs Causeway

The Roger Tym & Partners Town Centre Study, which forms part of the evidence base, doesn't identify a requirement for additional comparison floor space before 2016. There is, therefore, no justification for any major extension to the Mall in the short term in order to provide additional comparison floorspace to meet South Gloucestershire's needs. However, it is recognised that some modest changes to the retail offer may be required to meet the changing needs of retailers and to maintain the viability of the Mall and the needs of the growing nearby population. For this reason, it is considered inappropriate to prescribe a floorspace limit. The designation of a town centre is dependent on the re-modelling and delivery of the new neighbourhoods at Patchway/Cribbs and will be an integral part of the development strategy for the area.

Abbey Wood Retail Park

Abbey Wood Retail Park is an out-of-centre location. Not only is there no quantitative or qualitative justification for further significant convenience floor space, there is also no local need argument with a Sainsbury's close by. While the Core Strategy supports a more flexible approach to the use of this Retail Park, which could include an element of food retail, this was seen as an opportunity to introduce town centre uses onto the site which would serve to broaden the range of uses that capitalise on its location adjacent to a mainline rail station, and creation of a new people orientated public space. The proposal is contrary to the spatial strategy and vision for the Bristol North Fringe.

Sainsbury's/B&Q at Stoke Gifford

The Sainsbury's/B&Q site is identified potentially as a new district centre to serve the Stoke Gifford/Filton area post 2026. However, the Council agrees that investigation of this site would be appropriate before 2026. Amendments are proposed to Policy CS25 Bristol North Fringe to reflect this.

Patchway District Centre

The creation of a new district centre at Patchway is already committed as part of the Charlton Hayes development, as identified in the spatial strategy.

Other matters

Concerns about shop frontages, types of retail premises, car parking and recent development at Longwell Green Retail Park are not strategic issues. Such matters are for the Sites and Policies DPD, which will include development management policies. Policy CS14 does, however, recognise that the character and vitality of town centres needs to be protected from inappropriate development and the loss of retail units.

There are a number of minor amendments appropriate on Policy CS14 and the supporting text, to correct wrong cross referencing, to introduce the Town Centre and Retail Study and to correct the list of local centres.

Proposed Changes – PC100 – PC107

CS15 – Distribution of Housing - see Chapter 4 c) – Strategy for Development above

Policy CS16 – Housing Density and paragraphs 10.12 – 10.15

17 objections and 6 statements of support were made to Policy CS16 and the supporting text. The objections were principally from developers and consultants, but also included the Environment Agency, parish councils and local residents.

The main issues raised were that:

- The policy was inconsistent with PPS3, now that the 30 dwellings per hectare minimum density requirement has been deleted by the Coalition Government;
- The density of 30-40 dwellings per hectare was too high in some areas;
- The retention of a minimum density target was favoured;
- Flexibility wanted to achieve higher densities;
- There were concerns about the impact of high density development on character, open space provision, traffic and parking and other design matters.

Response

The policy is clear in its intent to make efficient and sustainable use of land and to not squander this resource, but recognises that this has to be balanced against accessibility to public transport, the character of the area, the design objectives in Policy CS1, the provision of open space, and the mix of housing types in an area.

Application of this policy will result in differing densities being appropriate depending on local circumstances. It is not considered that removal of the density targets will adversely affect the intent and implementation of this policy. The new neighbourhood policies will, however, identify that an average density requirement for housing will be established through the masterplanning process.

A number of points made by objections concerned implementation of the policy rather than the wording of the policy.

Proposed Changes – PC114 – PC115

Policy CS17 – Housing Diversity and paragraphs 10.16 – 10.24

14 objections and 9 statements of support were received. The objections were principally from developers and consultants, but also included the Environment Agency, parish councils, interest groups and the Council's Labour Group.

The main issues raised were:

- One objection considers the references to specific housing mixes to be overly prescriptive and inappropriate in the policy;
- Objections on housing mix mainly concerning issues of clarity, implementation (particularly on small sites) and delivery, and seeking greater flexibility in the wording of the policy;
- Objections seeking amended wording on development in gardens following the Coalition Government's announcement on "garden-grabbing" and changes to PPS3;
- Objections relating to flat conversions and their impact on parking and amenity.;
- The South Gloucestershire Labour Group raised concerns that car ownership levels were not taken into account prior to publication of the Core Strategy.

Response

In respect of housing mix, the Council disagrees that the policy (2nd, 3rd and 5th paragraphs) is overly prescriptive or un-implementable. Nor is the policy requiring a mix of housing to be provided on non-strategic sites however small they are. Rather it is requiring that sites should make a contribution to providing greater choice across an area. Clearly, the smaller the site, the less the contribution can be.

While the Coalition Government has removed gardens from the definition of brownfield land, this will not preclude planning applications from coming forward nor will it provide justification alone for the refusal of planning permission. Local planning authorities are still required to consider such planning applications on their merits. Therefore, it is important that the Council sets out its policy position for development in gardens to avoid a policy vacuum. To reflect the reasoning behind the Coalition Government's stance on development in gardens, it would be appropriate to add a reference to protecting the character of an area.

The Labour Group's concerns have been addressed in paragraph 10.23 of the chapter.

Proposed Changes – PC116 – PC117

Policy CS18 – Affordable Housing and paragraphs 10.25 – 10.40

35 representations were made on Policy CS18 and the supporting text consisting of 25 objections and 10 statements of support. Six of the representations were from Parish/Town Councils.

Over half of the objections related to the lack of evidence on the economic viability of development sites if a 35% affordable housing target was pursued and that the policy was not underpinned by a viability assessment. A smaller number of objections were specifically concerned about the impact of lowering of the site size threshold.

There was also individual concerns that the policy did not specifically refer to lower levels of affordable provision where lack of viability could be demonstrated and that builders would not have the resources to fund viability assessments, as provided for in the policy.

The Cotswold Conservation Board (AONB) believed the rural site size threshold should be set below the five dwellings suggested whilst a councillor welcomed the proposal that the Sites and Policies SPD would address the issue of off-site contributions to affordable housing.

Two Parish Councils were concerned that 'blanket' overall percentages of affordable housing may not be appropriate to rural areas although two others supported the policy as set out. One MP felt there was too little commitment for 'affordable housing to buy'.

Concern was expressed that, if, as originally set down in paragraph 10.36, attempts were made to impose a local connection qualification for access to affordable housing on market housing sites in rural areas then (a) this would make it difficult for Registered Providers to raise funding from lenders to deliver schemes and (b) it was contrary to the provisions of PPS3 which tied this to local provision on 'exception sites'. One response wanted a definition of what level of local connection was required.

Response

The 'Economic Viability Assessment – Affordable Housing Policy' study was published in November 2010. This provides the evidence base for adopting a 35% affordable housing target. A seminar for key stakeholders on the outline findings was held in late July. The 35% target is one set for the medium to long term given that the Core Strategy looks to 2026. It is anticipated that the economic viability of residential sites will improve over the period as house prices increase in real terms, the conclusion of the study is that it might take up to five years, i.e. to 2015, to reach the real price equivalent of the 2007 house price peak.

In the immediate short term the 'Economic Viability Assessment' has advised that a 35% target is a perfectly reasonable one for the Council to adopt in order to achieve mixed and balanced communities. However, in the current national economic climate, and without the real increase in house prices it should be accepted that this is a target figure and that for some sites total reliance cannot be placed on funding through land values alone to deliver this 35% figure. A combination of other financial support measures is therefore likely to be required. If not forthcoming then an acceptable level for affordable housing will need to be negotiated.

Given the position set out above, Policy CS18 and the associated text should be amended to clarify that the Council will require 35% on site affordable provision. However it does recognise the need for flexibility.

In respect of site size thresholds, the threshold in rural areas is already set at 5 or more dwellings in the South Gloucestershire Local Plan so there is no change proposed there. The proposed reduction in urban thresholds to 10 dwellings or more (0.5ha+) aims to capture an affordable housing contribution from a greater range of sites given that the Strategy particularly aims to make efficient use of land in and around town centres and other urban locations with good accessibility. There is no evidence about a general lack of economic viability on such sites if affordable housing was to be provided.

It is however recognised that there is a practical aspect in not setting very low site size thresholds, aside from not impacting detrimentally on small builders. Threshold targets lower than those currently proposed would significantly reduce viability on the basis that *“the limited amount of private housing is unable to support the loss of sales revenue resulting from the provision of affordable housing”*.

The ultimate aim of the policy is to maximise on- site provision of affordable housing with off -site provision being the exception.

In respect of comments about the perceived lack of regard to the specific needs of local areas for affordable housing. The Strategic Housing Market Assessment (SHMA) provided evidence of the high levels of need across the whole district and this has provided the basis for a single target figure for affordable housing to maximise provision within South Gloucestershire and to provide clarity to developers.

The 80:20 tenure split, between social rented housing and intermediate housing, is again supported by the SHMA and reflects the large numbers of households who cannot meet their housing needs on the open market.

However, the majority of affordable intermediate housing is likely to consist of some form of housing to buy, for example on a shared equity basis, although for the majority registered as having a housing need even these are likely to be unaffordable, hence the emphasis on social rent.

Additionally, on any site, apart from rural exception sites, at least 65% of housing will be private open market provision and this can also include low cost market housing likely to be suitable for first time buyers. *PPS3: Housing* specifically states that developers should bring forward market housing that reflects the demand and profile of households requiring market housing.

PPS3: Housing also says that on smaller, non strategic sites, the housing mix should also have regard to the existing mix of stock in the locality and contribute to the creation of mixed communities, this is set out in policy CS17, and will be the subject of section 106 negotiations.

Overall it is therefore considered that there is sufficient flexibility in local policies and national guidance to reflect demands and needs within the district.

In respect of paragraph 10.36 of the supporting text, it is felt that appropriate policies and procedures would overcome the concerns being expressed. However, within the Core Strategy document this ‘local connection’ issue is simply a ‘consideration’ to be explored, and is not formally incorporated within a Core Strategy policy. Any local

connections policy would need to be developed within a supplementary planning document and consulted upon separately, this would enable detailed attention to be given to the issues raised.

A new paragraph has been included which addresses how the Council will deliver the Coalition Government's October 2010 initiative "Homes on the Farm", which facilitates the conversion of disused farm buildings for affordable housing for local needs.

Proposed Changes – PC118 – PC126

Policy CS19 – Rural Housing Exception Sites and paragraphs 10.41-10.51

10 objections have been made to Policy CS19 and the supporting text and one statement of support has been received from an environmental interest body. Objections were made by affordable housing providers, agents, private individuals, one parish council, one local political party and a local councillor. The main issues raised were:

- the policy should allow for small scale rural exception sites near communities without settlement boundaries;
- the Council should identify specific sites for rural affordable housing only developments now, rather than as a last resort; and
- the requirement for schemes to be initiated or supported by Parish Councils will reduce and delay the number of sites coming forward and should be a material consideration not an absolute requirement.

Other points made were:

- it was not reasonable to require a full appraisal of sites for every rural exception site;
- it was unclear how a Parish Council can "initiate" housing when they are neither a landowner nor a developer;
- the Council should identify settlement boundaries for villages where there are none in order to allow for exception sites under this policy;
- the Council should support market housing delivery in rural areas where this can enable affordable housing delivery; and
- requests for clarification with regard to matters to be included in the legal agreements attached to rural exception dwellings, the cascade approach and equality issues in relation to local connection restrictions.

Response

This policy was written before the Coalition Government's initiative "the Community Right to Build" was proposed. Communities with a 75% vote in favour of a development (that is 75% of those who voted) will be able to build without planning permission. It may be necessary to reconsider the wording of this policy, including where such sites would be allowed and the need for Parish/community support, once further details are provided in the Localism Bill/Act.

The Council considers that it would be inconsistent with the Localism agenda for the Council to allocate specific sites for rural affordable housing only.

It is proposed to prepare a revised Affordable Housing Supplementary Planning Document to amplify this Policy and Policy CS18 (Affordable Housing) to cover matters such as the cascade approach and details of legal agreements. This document will be subject to consultation.

The limitation of occupancy to those with a “local connection” on rural housing exception sites is a specific requirement of PPS3 and this requirement is operated under the current Local Plan rural housing exception policy without equality concerns.

A minor amendment to Policy CS34 and supporting text has been made to reflect the Coalition Government’s October 2010 initiative “Homes on the Farm”, which facilitates the conversion of disused farm buildings for affordable housing for local needs.

Proposed Changes – PC127 – PC128

Policy CS20 – Extra Care Housing and paragraphs 10.52 – 10.61

10 objections and 7 statements of support were received in relation to Policy CS20. The key issues were mainly generated by land agents/developers, Local Members and NHS South Gloucestershire.

The main issues raised were:

- That whilst supportive of the principle of trying to promote private sector Extra Care accommodation, the requirement to provide an element of affordable housing will not work and will inhibit rather than encourage delivery of this form of housing;
- Easy walking distances should be defined in the policy;
- Thornbury (CS33) should be added to the list of neighbourhoods in the policy through which Extra Care Housing will be provided owing to its population demographic;
- The policy needs to be broadened to encourage more types of housing for the elderly and disabled;
- Reasonable ancillary facilities should only be provided where necessary and viable; and
- Policy must give consideration to flood risk.

Response

One of the main objections to the Extra Care policy was the requirement to provide an element of on-site affordable units, which developers argue will inhibit delivery of Extra Care Housing due to schemes not being viable. The policy and supporting text has been re-worded in consideration of these comments.

It is not considered that defining 'easy walking distance' in the policy is necessary as any new development will be expected to have regard to Policy CS1 and CS8 of the Core Strategy, 'Improving Accessibility'.

It is not considered that any further changes to the policy are required.

Proposed Changes – PC129 – PC132

Policy CS21 – Gypsy and Traveller Accommodation and paragraphs 10.62 – 10.68

15 objections and 3 statements of support were received in relation to Policy CS21 and the supporting text. The majority of key issues were raised by community or interest groups and the Environment Agency.

The main issues raised were:

- Uncertainty over the continuing development of the Gypsy and Traveller DPD affects the ability of people to respond to this policy. For example, despite making a case that the numbers in the GTAA were too high, it does not make clear what the Council thinks the numbers should be, detail of how needed pitches will be delivered and what will happen when a safeguarded site ceases to be safeguarded due to a temporary planning permission;
- The Council should make a commitment to meet needs as identified by the RSS in the timescales required. Even though abandoned, the RSS allocations have resulted from a detailed and considered examination of the evidence base during the EiP and as such form a material consideration.
- Policy was not conformable with Circular 01/2006, casts doubt on the needs and may not deliver in appropriate time frame - suggestion that it should be a criteria based policy;
- It was not feasible, viable or desirable to include pitch provision as part of the new neighbourhoods – there was no justification for this requirement;
- Site at The Meadows, Pucklechurch in safeguarded list is not authorised;
- Any land provided for Gypsy and Traveller accommodation or caravans must not be located within Flood Zone 3.

Response

Land at The Meadows, Pucklechurch will now be removed from the list of safeguarded sites following the recent application for its renewal as a Gypsy/Traveller site being refused.

The Council is of the opinion that this policy demonstrates a deliverable approach in attempting to meet the short term and longer term accommodation needs of Gypsies and Travellers in South Gloucestershire. It is not considered that any policy changes are required. Clarification in the supporting text as to the potential number of Gypsy/Traveller pitches that could be provided has been added at paragraph 10.66.

Subject to the adoption of the Core Strategy, SGLP Policy H12 will be deleted. As a result of the introduction of policy CS21 and the deletion of SGLP Policy H12 there are consequential changes required to the Proposals Map, these are set out in the 'Schedule of Changes'.

Proposed Changes – PC133 – PC135

Policy CS22 – Travelling Showpeople and paragraphs 10.69 – 10.73

3 objections have been made to Policy CS22 and the supporting text. Objections were received by the Highways Agency, the Environment Agency and a representative from the community. The issues were:

- whether or not the Council's reasoning for the figures in the RSS/GTAA being too high has had independent scrutiny;
- a suggestion to include criterion in the policy which assesses the highway impact of proposals for sites; and
- Any land provided for caravans must not be located within Flood Zone 3.

Response

It is not considered that a detailed assessment of highway impacts is required as issues in relation to this are covered in consultation with transport engineers at the planning application stage.

The policy will remain as drafted – provision to be made through the Sites and Policies DPD having regard to certain criteria and the safeguarding of existing land in the area for the accommodation of Travelling Showpeople.

Subject to the adoption of the Core Strategy, SGLP Policy H13 will be deleted. As a result of the introduction of policy CS22 and the deletion of SGLP Policy H13 there are consequential changes required to the Proposals Map, these are set out in the 'Schedule of Changes'.

Proposed Changes – PC136

Policy CS23 - Community Infrastructure and Cultural Activity paragraphs 10.74 – 10.80

10 objections and 1 statements of support were made to Policy CS23 and the supporting text. The main points from the representations were:

- Questioning the relationship the policy has with Government Circular 05/05 (Planning Obligations) and the Community Infrastructure Levy (CIL) Regulations, in this respect there were comments about the deliverability of the policy;
- Requests for flexibility to the application of the policy;
- Allocation of sites sought;

- Expand the list of facilities to include allotments/community gardens/public conveniences; and
- Provide a clearer definition of community facilities.

Response

To improve the clarity between the policy, the supporting text and the intended content of the future Sites and Policies DPD, minor amendments have been made. It is considered that to better describe the scope of the policy, it is re-named to replace the words “community buildings” with “community infrastructure”, and the appropriate changes made to the policy and supporting text to reflect this. The deletion of the final four words of the policy will bring the policy in line with Circular 05/05 and CIL Regulation 122(2) and is considered entirely appropriate and reasonable.

List of facilities to be expanded to include allotments and public conveniences.

Proposed Changes – PC137 – PC140

Policy CS24 – Green Infrastructure, Sport and Recreation Standards paragraphs 10.81 – 10.93

20 objections and 4 statements of support were made in relation to Policy CS24 and the supporting text. Objections were raised from British Waterways, The Wildlife Trust, a residents Society, planning agents, developers, a South Gloucestershire Councillor, Bitton and Frampton Cotterell Parish Councils, the Environment Agency, a resident, the Woodland Trust, housing associations, the Council for Disabled People, and the South Gloucestershire Liberal Democrat Group. Supportive statements were received from the Avon Wildlife Trust, the Forestry Commission and Filton College. The main issues raised were focused on minor amendments to the policy and clarification on the implementation of the standards.

The main points from the representations were:

- Ensuring flexibility and fairness when applying the standards;
- Introduce more detail to clarify, embellish and allow for the flexible application of the standards;
- Broaden the range of types of space covered by the policy and refer to planting of native trees in the supporting text;
- Local standards need to be fully evidenced and consulted upon;
- Minor amendments were suggested as was the introduction of more detailed passages of text to provide greater emphasis and explanation;
- Request that neighbouring authorities’ facilities be incorporated into the consideration of existing local provision;
- The Inspectors recommendation to Bristol City Council's Core Strategy was that if the application of the open space standards might be used to refuse a planning application, it should be set out in a DPD (and hence subject to independent examination) and not SPD.
- Ensure consistent use of terms when referring to open space and green infrastructure;
- Highlight ecological sensitivity as a potential reason to restrict public access;
- Paragraph 10.82 should refer to the retention of existing habitats;

- Paragraph 10.84 - Questions relating to the size of development that would form the threshold for financial contributions; and
- Paragraph 10.85 - recognise that such areas may well offer value for local biodiversity.

Response

It is considered that minor amendments would improve the clarity of the policy. It should be made clearer in the supporting paragraphs that the policy will be supported by the adoption of the Green Infrastructure Supplementary Planning Document. The policy has to be supported by robustly justified local standards, addressing quantity, quality and accessibility in accordance with national guidance and best practice. These local standards have been set out in the Open Spaces Audit which will be published to support the Core Strategy.

In respect of the Inspector's comments to Bristol City Council's Core Strategy, the national planning guidance and CABI's Open Space Strategies – Best Practice Guidance have been subject to review; and there is not a conclusive view on the necessity to include standards. However, it is recommended that the standards should be set out in a new appendix to the Core Strategy and referred to in the supporting text to the policy.

Finally, the policy should be clear to all readers and therefore it is considered that the reference to open spaces is replaced with green infrastructure. Further detail will be set out in the Green Infrastructure SPD.

Proposed Changes – PC141 – PC148, PC251

Policy CS25 – Communities of the North Fringe of Bristol Urban Area, paragraphs 12.1-12.11

34 objections and 13 statements of support have been made to Policy CS25 and the supporting text in Chapter 12. Just under one third of the objections were from Parish Council's and individuals. Patchway Town Council, Almondsbury, Tytherington and Dodington Parish Council all objected.

There was little objection to the vision. Developer and commercial respondents tended to focus on specific interests. These included:

- Abbey Wood Retail Park - the landowners are continuing to pursue a large food retail outlet on the former Woolworths site;
- PRUPIM are seeking 'town centre' status for Cribbs Causeway;
- NHS South Gloucestershire / King Sturge proposed that the Frenchay site should be included as a 'mixed-use development (to include health care facilities) in CS25;
- WYG Planning on behalf of Sainsbury's supported a new district centre on their Stoke Gifford site before 2026;
- RPS on behalf of Crest sought clarity on the phasing of East of Harry Stoke.

Other comments from key stakeholders included:

- The HA required further information on the impact of proposed development on the Strategic Road Network;
- The EA sought further information on the impact of development on the Henbury Trym & Ham Brook Catchments. UWE redevelopment and East of Harry stoke should be considered together;
- UWE generally supported references to the role of the Frenchay Campus in this section:
- Wessex Water wished to pursue financial contributions or works in kind from developers to upgrade the trunk sewer network;
- BAE systems supported safeguarding of the airport and noted that changes in working practices may mean the airport may become redundant during the plan period, hence wished to be involved in master planning of the surrounding area;
- King Sturge on behalf of a private individual is seeking review of the greenbelt around the new wildlife park for development and renewable energy generation opportunities;
- Air Quality Management Areas should be referred to; and
- Avon Wildlife Trust and Patchway Town Council expressed concern about impact on open space.

The Parish Council's and individuals interests varied but tended to either object in principle to further development, particularly in the Cribbs Patchway Area, and / or query 'master planning' issues, such as the potential extent and location of green corridors. Patchway Town Council raised concerns about overdevelopment, congestion and the need to safeguard green corridors such as around the airfield and along the Henbury Trym. Almondsbury Parish Council questioned the definition of the North Fringe (Wyke Beck to Lysander Road is semi-rural). Tytherington Parish Council raised concerns about the loss of Grade I & II agricultural land and Dodington Parish Council raised concerns that increased development would lead to further congestion and therefore reduce opportunity for the people of Yate and Chipping Sodbury.

Response

The landowners of Abbey Wood have not provided sufficient evidence to suggest that a mixed-use scheme is not deliverable on that site or that a further large supermarket is needed. The Council is supportive of regeneration proposals.

The status of Cribbs Causeway is dealt with under CS14.

The Council welcomes the inclusion of the Frenchay site as an additional mixed use opportunity.

The Sainsbury's and B&Q is well served by public transport and the site is ideally located in this part of the north fringe (being at the centre of existing, new and proposed housing sites and adjacent major commercial interests) to serve the area with a wider range of uses. The Council welcomes Sainsbury's / B&Q site as a 'district centre' opportunity and insert into the policy.

It is envisaged that the planning of East of Harry stoke will commence before 2016.

The Highways Agency, Environment Agency, Wessex Water & BAE (with regard Cribbs/Patchway) are and will continue to be engaged in the master planning of the new neighbourhoods and other opportunities, as will Parish Councils where appropriate.

Greenbelt land does not preclude the promotion of renewable energy opportunities. It is considered that the articulation of the need to protect and enhance open spaces could be further strengthened in the Vision. Creating viable green networks is a key objective of CS2 and New Neighbourhood policies. Objective 7 of CS25 seeks the creation of 2 key green linkages through the North Fringe.

Proposed Changes – PC150 – PC158

Policy CS26 – Cribbs/Patchway New Neighbourhood and paragraphs 12.12-12.19

24 objections and 4 statements of support were made to Policy CS26 and the supporting text in Chapter 12. Only one local individual objected. All other representations were made by developers, agents, statutory undertakers and interest groups. No Parish Council objections were recorded. Patchway Town Council objections were recorded under CS25.

A number of developers and their representatives objected to the need and deliverability of a single Concept Plan for the entirety of the area. Other responses tended to focus on master planning issues, such as the extent of green infrastructure, the disposition of land-uses around the airfield and connections with the wider area.

Other comments from key stakeholders included:

- The Highways Authority required further information on the impact of proposed development on the Strategic Road Network, specifically J17;
- The Environment Agency sought further information (SFRA level 2) on the impact of development on the Henbury Trym & Catbrain Reservoir;
- BAE sought involvement in the master planning process;
- PJ Planning suggested that the proposed quantum of development (1750 dwellings) would not deliver the required infrastructure, hence land west of the A4018 Cribbs Causeway should be allocated.
- CPRE objected to loss of open land south of the airfield and Avon Wildlife Trust generally welcomed the GI approach but raised concerns about impact on the Filton Railway Cutting SSSI.
- Woodland is unlikely to be acceptable at the end of the runway as it attracts flocking birds. Species rich grassland would be a more appropriate ecological use - amend paragraph 12.17 accordingly.

Response

The Council is taking a leading role in working with development partners to produce delivery statements for land north and south of the airfield, which will demonstrate the deliverability of this new neighbourhood in accordance with the policy CS26.

The Council, working together with community and development partners, is preparing design documents in accordance with its SCI, that will take a holistic approach to the delivery of the Vision and Strategic Objectives of the area, to ensure that development comes forward in a coordinated way and reflects the communities' aspirations.

The Highways Authority, Environment Agency, & BAE (with regard Cribbs/Patchway) will continue to be engaged in the master planning of the new neighbourhood.

The IDP sets out the estimated cost of new infrastructure.

Subject to the adoption of the Core Strategy, as a result of the introduction of this policy there is a consequential change required to the Proposals Map, this is set out in the 'Schedule of Changes'.

Proposed Changes – PC159 – PC162

Policy CS27 – East of Harry Stoke New Neighbourhood and paragraphs 12.20-12.26

15 objections and 2 statements of support were made to Policy CS27 and the supporting text in Chapter 12. No objections were received from local people or Parish Council's. Only 1 objection was received (from the CPRE) regarding the loss of the greenbelt.

The comments received essentially comprised:

- RPS on behalf of Crest objected to the prerequisite of the SGTL and sought greater flexibility on dwelling numbers;
- CPRE objected to the loss of Greenbelt;
- Baker Associates on behalf of SLP questioned the deliverability of the site;
- DLP Planning seeking inclusion of land east of Jct1 at Hambrook;
- The EA are seeking further information (SFRA level 2) on the impacts on the Hambrook catchment (SFRA level 2);
- The HA require further information on the impact of proposed development on the Strategic Road Network, specifically J1 (M32).

Other objections generally concerned master planning issues, such as the need to include bridleways, the extent of the green corridor adjacent the motorway, connections to UWE and the use of land under the pylons.

Response

The Stoke Gifford Transport Link forms part of the Bristol North Fringe Rapid Transit route proposals as set out at Policy CS7. The route is therefore proposed to be safeguarded from the Local Plan site 13 – Harry Stoke to Great Stoke Way to provide a north-south transport connection. The policy and supporting text are proposed to be amended to clarify and reflect this approach.

Subject to the adoption of the Core Strategy, as a result of the introduction of this policy there are a number of consequential changes required to the Proposals Map, these are set out in the 'Schedule of Changes'.

Proposed Changes – PC163 – PC167

Policy CS28 – The University of the West of England and paragraphs 12.27-12.29

7 objections and 1 statement of support were made to Policy CS28 and the supporting text in Chapter 12. 1 general objection to intensification of the North Fringe was received from a Parish Council and is dealt with under CS25.

University of the West of England (UWE) made a number of comments which can be summarised as the following:

- Concern that UWE is being promoted as a ‘focal point for the wider community’ is overstating its role;
- The delivery mechanisms for the Cheswick bus link and RT are yet to be agreed; and
- Any planning contributions arising from redevelopment of Frenchay, St.Matthias and Glenside campuses should be considered ‘in the round’ rather than on a ‘plot-by-plot’ basis.

Other comments essentially concerned master planning issues such as the need for improved walking and cycling links to Parkway Station, a strategic drainage scheme (EA) and appropriate healthcare provision for students. The Highways Agency also required further information on the impact of proposed development on J1 (M32).

Response

The regeneration proposals promoted by UWE are generally welcomed. The potential for greater community use of the UWE facilities and physical connections to and through the site were initially promoted by UWE recognising its important cultural role. The expanded Frenchay Campus also sits at the centre of and adjacent to 3 SGLP housing allocations comprising some 2800 dwellings, as well as existing housing to the south, established commercial uses east & west and the East of Harry Stoke New Neighbourhood nearby. It is therefore critical to the sustainable development of this part of the North Fringe that UWE is encouraged to continue to ‘look outward’ and work with the Council, local community groups and developers to improve both physical and community connections where opportunities allow.

The Cheswick bus link has been a long standing proposal as set out in the SGLP. The policy is non-specific as to funding sources and the Council are exploring a range of sources of funding. The scheme is proposed in the 2011 Capital Programme.

The scope for realising planning contributions from the St.Matthias and Glenside campuses towards the Frenchay redevelopment is limited by the fact that they are in Bristol City.

The Highways Authority and Environment Agency are and will continue to be engaged in the master planning of the new neighbourhood.

Subject to the adoption of the Core Strategy, as a result of the introduction of this policy there is a consequential change required to the Proposals Map, this is set out in the ‘Schedule of Changes’.

Proposed Changes – PC168 – PC169

Policy CS29 – Communities of the East Fringe of Bristol Urban Area and paragraphs 13.1-13.11

40 objections and 14 statements of support were made in relation to Policy CS29 and the supporting text in Chapter 13. Approximately half of these comments were from development interests.

Developer and commercial interests objected on the grounds that housing and/or employment land should be allocated as a result of a review of the Green Belt boundary at the following sites:

- Barry Road, Oldland,
- Bromley Heath Road, Downend,
- Shortwood Golf Course,
- Warmley,
- Hanham Hills
- Cossham Street/Rodway Hill.

However, there was also strong community support for the strategy of protecting the Green Belt and landscape setting of the area, as well as for safeguarding employment land and protecting the viability and vitality of the town centres.

The operators of Shortwood Quarry and landfill site wanted to add reference to the Minerals & Waste Local Plan and Joint Waste Core Strategy in respect of the potential impact of the Emersons Green East development on the operation of the site.

A number of objectors were concerned that the proposals in the policy for facilities and infrastructure to support existing and new development were not adequate, in particular relating to transport (bus services and M4 link) and green spaces.

Further representations concerned detailed issues relating to development management policy and practice including the need to control conversions of shops to flats and takeaways,

Detailed objections were made to Figure 10 and to the lack of reference to bridleways in CS29.

Response

The additional development sites promoted by developers to be allocated in Policy CS29 are located in the Green Belt are not in line the Core Strategy - strategy for development (see statement on the Strategy for Development).

Guidance relating to controlling the impact of the Emersons Green East development on the Shortwood Quarry and landfill site is contained in the saved policies in the SGLP and the adopted development brief already referred to in Policy CS29 (1)

The infrastructure proposals outlined in CS29 reflect what is considered to be deliverable and at a level of detail and timescale which is appropriate to the Core Strategy.

Non strategic development management issues are covered by saved South Gloucestershire Local Plan policies which will be reviewed and replaced in the Sites & Policies DPD.

It is considered that Figure 10 could be amended to clarify the reference to Green Infrastructure. Reference to heritage assets relate to those which have been identified as of national importance and at risk. A reference to bridleways could also be added to Policy CS29(6).

Comments were received regarding the declaration of Air Quality Management Zones in Staple Hill and Kingswood. As a result, the text will be amended to include reference to these. Development management issues are dealt with by saved SGLP policy EP1 and therefore no change proposed to CS29.

Comments were also received emphasising the importance of protecting informal green space within the urban area because of its importance for biodiversity. Policy CS2 (5) – Green Infrastructure provides protection for such assets and so this is a matter for development management

Proposed Changes – PC170 – PC176

Chapter 14 – Yate and Chipping Sodbury: Policies CS30 and 31, Figures 11 and 12, and paragraphs 14.1 – 14.25

A total of 140 respondents made 235 representations to the Yate and Chipping Sodbury Chapter. Of the 235 responses 30 were supportive and 205 were objections. The majority of responses were objections from members of the community and a petition signed by 114 people that was submitted by Steve Webb MP opposing the 3,000 houses at north Yate. Responses were also received from developers, agents, statutory undertakers, town and parish councils (Yate, Sodbury, Westerleigh, Little Sodbury, Dodington, and Frampton Cotterell) the South Gloucestershire Liberal Democrat Group and interest groups.

Main Points

The responses were focused on the following points:

- Overall Strategy and the evidence, justification and need for 3,000 homes in the north Yate new neighbourhood;
- The provision of a supermarket at Barnhill Quarry, to the north Chipping Sodbury;
- Limited housing at Barnhill Quarry, to the north Chipping Sodbury;
- The anticipated impacts of the development at north Yate and Barnhill in particular the transportation (increased out commuting / lorry movements), flooding/drainage and ecological implications association with development;
- A number of omission sites (sites at Engine Common, north Yate (Home Farm) Coopers Works (the part of the site which is safeguarded for employment use) and Land East of Chipping Sodbury) were promoted;
- Promotion of an additional site for regeneration south of Badminton Road;
- Support for the objective of increasing self containment, but questions were raised about the actual impact home working aspirations would have upon congestion levels;
- A desire to see more details on how development impacts will be managed, such as ensuring infrastructure is delivered in advance of the development and how capacity concerns for the town centre can be overcome.

Barnhill Quarry

Concern was expressed about the provision of a medium supermarket at Barnhill Quarry north of Chipping Sodbury and similar objections were raised in relation to the limited housing in the same location, these were focused on:

- Impact on the retailers in Chipping Sodbury / questions about the actual need for a supermarket
- Parking issues
- Transport/lorry movements
- Flooding
- Impact on the SSSI
- Impact on the character of Chipping Sodbury

North Yate New Neighbourhood

Many responses highlighted concern about the lack of justification for the strategy to promote this level of development at Yate now that the Regional Spatial Strategy has been abolished. Other comments focused on:

- Flooding/Drainage
- Visual / ecological impact
- Environmental impacts
- Traffic/Congestion
- Capacity and access to facilities and services
- Impact upon Yate Rocks
- Density
- Local housing need / local housing requirements not reflected
- Integration with the rest of the town, the distance from the town centre and issues with the capacity of the town centre.

There was some support expressed for the new neighbourhood. Some objections stated that the site was an appropriate location for development but that 3,000 homes were too many. Respondents, who were opposed to any development on the site, stated the conditions that needed to be met if development was to regrettably occur, such as the necessary supporting infrastructure.

Comments from developers in the north Yate area asked to see the removal of the statements on phasing to allow development to come forward earlier / more flexibly.

Figure 12

Amendments have been suggested by the major land holder of the north Yate new neighbourhood; the main suggestions were:

- Extending the red line boundary of the site to incorporate land south of Rockwood House to accommodate allotment provision;
- Increasing the provision of green infrastructure across the site (to reflect the floodplain areas);
- Extension of the strategic movement corridor and green infrastructure connections into the Yate Outdoor Sports Complex site;
- A new access point into the site next to Brimsham Green School.

Representations also received:

- Natural England expressed support, stating that the new neighbourhood should be accommodated without compromising the special identity of Yate

- Rocks through the retention of a strategic green corridor subject to detailed design;
- The Environment Agency (EA) have highlighted that development at North Yate will impact on catchments, even if development is located outside the floodzones. The EA have advised that a high level catchment assessment be undertaken;
 - Yate Town Council objected to the allocation of significant housing numbers and to the specific details contained within the allocations;
 - Dodington Parish Council raised concerns that the strategy will place even more demands on the, already, overstretched local transport infrastructures;
 - Sodbury Town Council highlighted concerns over the North Yate new neighbourhood as it would result in a significant increase in traffic accessing the M4;
 - Westerleigh Parish Council commented that they wished to see an integrated approach to planning;
 - English Heritage were pleased that Engine Common is no longer being promoted and raised concern about the impact a new supermarket might have on the current commercial buoyancy of Chipping Sodbury's shops – a key characteristic of the conservation area;
 - Recognition should be made to Chipping Sodbury's historic quarrying and geological heritage in paragraph 14.1;
 - Uncertainty over the deliverability of improvements to the River Frome GI corridor, highlighted under point 2 of CS30 and paragraph 14.9;
 - Policy CS30 should refer Barnhill Quarry SSSI/RIGS as a heritage asset;
 - Reference should be made to the Ridge Wood and the impact of increased recreational pressures.

Response:

The Core Strategy puts in place a long term strategy to continue to strengthen Yate and Chipping Sodbury's role as successful and progressive Market Towns and to enhance resident's aspirations and the perception other people and businesses have of both Towns. These points are encapsulated in the vision, objectives and policies which have been informed and shaped by the community during the preparation of the Core Strategy.

To achieve the strategy up to 2016 the focus is on town centre investment, development of an evening economy and broadening the leisure attractions and retail outlets. This is supported by objectives to remodel the western approach employment sites (at Stover/North/Badminton Roads), some limited housing development on previously developed land and providing and planning for better public transport, walking and cycling connections within the Town and to key destinations. Post 2016 in order to fulfil the vision and spatial objectives developed by the community during the preparation of the Core Strategy, the development strategy recognises the need to strengthen and broaden the social, economic and physical base of Yate.

Planning the new neighbourhood for 2,400 dwelling by 2026 comprehensively as part of a whole town approach will continue to ensure sustainable growth by helping to unlock the investment needed to support the delivery of new infrastructure which will bring significant benefits to the town. It will also address the existing needs of the residents of Yate and Chipping Sodbury in terms of affordability across the housing market and broadening choice. Importantly, this will facilitate the retention of family and friendship relationships by allowing people to stay living within the town. The new

neighbourhood will also provide for new and extended education provision, addressing the current deficiency in the distribution of primary schools across Yate.

No major changes are therefore proposed to Core Strategy policies CS30 and CS31. However changes are put forward to better reflect the proposed green infrastructure area in the new neighbourhood, to increase the extent of the regeneration area along Badminton Road, and to help clarify application and implementation of the policies CS30 and CS31.

Subject to the adoption of the Core Strategy, as a result of the introduction of this policy there are a number of consequential changes required to the Proposals Map, these are set out in the 'Schedule of Changes'.

Proposed Changes – PC177 – PC192

Chapter 15 - Policies CS32 – Thornbury and CS33 – Housing Opportunity, paragraphs 15.1 – 15.14

A total of 620 respondents made 739 representations to the Thornbury chapter, with nearly all concerning the Housing Opportunity Area identified to the north of the town at Park Farm. Of these representations, 713 were objections and 22 supports.

Save Thornbury's Green Heritage submission – key points

A local opposition group Save Thornbury's Green Heritage submitted a substantial representation objecting to the inclusion of the proposal, the key points of which are summarised below:

Consultation

- Previous public consultation used to inform the strategy for Thornbury was insufficient and flawed. Previous consultation does not necessarily support Park Farm as a preferred location for development.

Evidence and justification

- The need for surplus primary school places to be filled is not justified and there is no evidence to suggest that the development would fill those places. Houses should not be built in order to fill schools and Castle School's aspiration of consolidation onto a single site should not justify the need for more housing.
- It has not been demonstrated that development would increase town centre vibrancy. Competition from the out of centre Tesco supermarket and Cribbs Causeway is the main factor in the town centre's decline. New residents would be likely to drive to these places rather than walk to the town centre to shop.

Sustainability Appraisal

- Detailed objections submitted relating to unclear and flawed methodology/conclusions and that the rating/scoring system for different options is inconsistent, biased and not supported by adequate evidence.

Location of development and other general comments

- The Inspector for the South Gloucestershire Local Plan Inquiry did not support development at Park Farm, indicating instead that land at Morton Way would be more suitable if development were to come forward.
- Development would harm biodiversity as the area contains Biodiversity Action Plan priority habitats and species.
- Development would harm historic landscape, landscape character, listed buildings and heritage features, residential amenity, agricultural value and the town's wider setting.
- Figure 13 is imprecise and does not give accurate details regarding the extent of development or access onto Butt Lane.
- Proposed area is subject to flooding and development will increase risk of flooding to third parties.
- Housing development not supported by adequate employment opportunities so commuting would increase and residents unlikely to walk/cycle to shops/services. Development would therefore exacerbate traffic congestion at Butt Lane/Gloucester Road and onto the A38. Consolidation of Castle School at the Park Road site would also increase congestion near to Park Road.
- Other sites at Morton way and adjacent to the town centre are more suitable for development. Development should occur within current town boundaries in the first instance.

Other representations from the public

The majority of objections received were from local residents and echoed one or more points raised by Save Thornbury's Green Heritage as summarised above. A large proportion was made via a standard representation form drafted and printed by the Save Thornbury's Green Heritage Group. A substantial objection was also received from a Mr Lanfear mainly regarding the way public consultation and the Sustainability Appraisal were undertaken.

A number of residents suggested that Morton Way would be more suitable for development and some suggested that Castle School should also be rebuilt there with housing then to be built at the vacated Park Road site. Some also questioned why the Core Strategy does not appear to take account of the development that has occurred in Thornbury in recent years.

A 120 signature petition was received from people living near to Morton Way requesting that Morton Way not be considered for development (this has been included as one representation in overall figures).

The majority of objections from residents fall into two broad categories: 1) those which acknowledge the need for some new housing in Thornbury, just not at Park Farm and/or not as many as 500; and 2) those which are against any further housing in principle. Some residents suggested a different amount of housing for Thornbury with between 50 and a maximum of 100-200 being the most common suggestions.

Residents also highlighted omissions and inaccuracies in Figure 13, as well as identifying a lack of account being taken of the impact on Thornbury of a potential new nuclear power station at Oldbury.

Representations were also received from the following organisations:

- English Heritage objected to the identified housing site stating that there is no evidence to support the chosen site in terms of its potential heritage impacts.
- Thornbury Town Council and Castle School support the identification of Thornbury as a settlement to support the development in the spatial strategy and they support the identification of Park Farm as the preferred location.
- Natural England are satisfied that the Thornbury policies will help to address issues identified and accept there is a case for some growth as long as it does not compromise heritage assets.
- The Environment Agency state that whilst Thornbury sits outside the floodplain it does transfer a large proportion of surface water into the network of rhines down at the lower slopes to the estuary. They therefore recommend that a surface water drainage strategy be taken forward to determine how drainage can be improved as a result of the proposals.
- NHS South Gloucestershire supported the aim of strengthening health facilities in Thornbury and state that Extra Care housing is required in the town to support the ageing population.
- Sustainable Thornbury suggest that neither the vision or proposal for housing will encourage self-containment and they suggest land to the west of Thornbury may be more suitable for development. They are also concerned that the figure of 500 dwellings has not been justified or properly appraised.
- Concern for Thornbury echoes several of the points set out by Save Thornbury's Green Heritage and suggests if development is needed then locations to the east or south of the town would be more suitable.
- Oldbury on Severn Parish Council raised concerns regarding potential increased flooding resulting from the development. They suggest that the Environment Agency must be fully involved and that there should be a requirement for regular inspection of any mitigation measures. They also raise concerns regarding the impact of increased traffic on Butt Lane resulting from the decommissioning of the nuclear power station. In addition it is suggested that Tesco and the Mall are among the causes for decline in town centre vibrancy.
- The Council for the Protection of Rural England (Avonside) accept that some more housing is needed in Thornbury.

Landowners and developers

Pegasus Planning who represent the landowners/developers at the Park Farm site submitted supporting representations for the vision and proposal for housing but object to some of the wording of Policy CS33, particularly the requirement for the development to provide a new sixth form centre. Instead they argue that the wording of the policy should be compliant with national guidance so that contributions to education are appropriate to the scale of development. Also stated is the assertion that the new dwellings can be delivered faster than proposed in the strategy for development.

Representations were received from other agents/developers proposing development sites elsewhere around the edge of Thornbury, these being Morton Way north, Morton Way south and west of Bristol Road, which they argue are superior to the site at Park Farm. These detailed representations call for a larger total quantum of

development in Thornbury, again to be delivered earlier than indicated in the strategy for development.

Response

Having considered the issues raised, the challenges facing Thornbury remain real and current as set out in the updated Sustainability Appraisal Report. Further housing development will help to sustain Thornbury as a successful and vibrant market town and the identification of the housing opportunity site at Park Farm represents the most suitable and appropriate location in order to fulfill the vision and spatial objectives identified for Thornbury. Other potential development sites along Morton Way would not be well related to the existing built form of the town and may set a precedent for continued expansion along the full length of the road and further eastwards. Potential sites to the south and west of the town are either in the Green Belt, the Conservation Area and/or suffer from no clear access routes into the town.

Suggested changes are being put forward to clarify the contributions that development will make to Castle School. It is also important to recognise that the Castle School's aspirations for consolidation onto a single site are long-standing and have previously been advanced separately from the Core Strategy. As a spatial plan, progressing the Core Strategy provides a means by which this can be recognised through the planning system.

While concerns have been raised regarding flooding at the Park Farm site, in the event of any proposals for development coming forward, the Environment Agency would be fully involved in overseeing the suitability of flood and drainage mitigation strategies. Policy CS33 contains specific requirements to ensure that if development goes ahead then there will be no negative impacts on any flooding issues.

Areas of ecological interest in the area (the Medieval Fish Ponds and stream corridor) can be conserved by incorporating them into the design of any development and by the provision of appropriate development buffer zones around them. With regard to any impact on heritage assets, Policy CS33 requires that an assessment of the historical assets forms the basis for identifying the final capacity and design of any development. However, reference is increased in the chapter regarding the requirement for high design quality of any forthcoming development (particularly in the relation to historic environment and ecology) and improving the clarity of Figure 13. The SA Report has been updated and existing information expanded in response to detailed representations. However this has not led to any change in its overall findings. Consultation to date has been well advertised and responded to and has complied with statutory requirements.

Proposed Changes- PC193 – PC202

Policy CS34 – Rural Areas and paragraphs 16.1 – 16.18

63 objections were received to Policy CS34 and the supporting text. 10 Parish councils made comments - Tytherington, Siston, Wick and Abson, Dodington, Tormarton, Aust, Hill, Bitton, Doynton and Marshfield. 2 statements of general support were made, plus 3 representations supporting different elements of the policy (improvements to public transport links and other supporting services, investigations

into the reopening of Charfield Station, the use of Parish Plans as a mechanism for identifying the aspirations of the local communities and the timescale for further consultation, the protection and conservation elements of the policy and the contributions towards new communications technologies).

The main issues raised in the objections were made largely by those with an interest in developing sites. The issue highlighted in the last bullet point was made by Local Members:

- Policy unnecessarily prescriptive and restricts new development in the rural areas. Policy should identify new development in some non green belt villages where there are facilities and services and should make reference to groups of associated settlements and their combined provision of services and facilities. Policy should allow for housing and other development which would assist in creating sustainable communities or sustain and develop existing communities;
- Settlement boundaries should be reviewed now not in 5 years – they are historic and are preventing an adequate supply of rural housing including affordable housing. No evidence provided to support the delay in reviewing settlement boundaries. Some rural communities without boundaries are prevented from having new development. Concept plan preparation should be allowed to inform development in advance of the 5 year period of review;
- Many specific sites identified for housing development; and
- Parish Plans – clarification sought about the role of these documents as not all communities are intending to prepare Plans and some existing Plans have not been promoted locally as spatial planning documents. The Parish Plan process must be given necessary support and if necessary the Council should consult specifically on the issue of rural housing distribution.

Other points made were:

- Requests for specific footpath/cycle links;
- Objections to any development in the Green Belt around Alveston and Shortwood;
- The inadequacy of infrastructure in the rural areas (drainage and sewage and local roads) and need to ensure that new development does not lead to flooding;
- Additional wording requested to amplify Green Belt clause of policy;
- Add “enhance” to clause 1 of Policy to accord with national environmental planning legislation, biodiversity targets and internal conformity within the Core Strategy. Local biodiversity should be given priority;
- Add “and encourage/promote” local food production to clause 2 of Policy
- Add healthcare to clause 10 which seeks contributions to infrastructure;
- Tourism and bridleways not mentioned in the Policy or supporting text;
- Decisions relating to employment (clause 7) “should be sympathetic to local concerns in maintaining the character and integrity of the community.” New or additional commercial or agricultural development must be economically viable. Barn conversions should be allowed under the policy;
- Need to retain appropriate employment uses in the countryside that maintain employment levels and acknowledge that some rural enterprises do not sit easily with other uses and the appreciation of the countryside;
- Protecting employment sites fails to recognise the social, environmental and economic benefits that can arise from alternative uses;
- Add tranquillity and conserving and enhancing the AONB to clause 1 of the Policy;

- Communities should have more say/should determine what happens in their communities;
- Severn Beach should be part of the Severnside area;
- Affordable housing difficult to achieve through rural exception sites. Core Strategy should consider other ways of achieving affordable housing, for example a policy which provides 1 affordable home for every market home built. Restrict extensions to existing homes with a floor space of say 1,800 square feet to permitted development rights only, in order to keep some houses within the affordability range of the locals;
- No mention of village pubs, schools and shops;
- Reference to rural areas providing a unique and valuable setting to the urban areas should be deleted as the rural areas are communities in their own right and not there as a back drop or setting to the urban areas;
- Suggested changes to tighten the protection given to agricultural land and promote local food production – e.g. Add "and encourage/promote" local food production to clause 2 of Policy;
- Reference to renewables should be caveated by references to constraints such as wildlife, views and landscape and built form etc. Missed opportunity to highlight areas which offer good potential for energy generation;
- Visual intrusion, noise and pollution from motorways are identified as problems but are not addressed in the policy; and
- Only development of high quality design is acceptable in villages.

Response

Main issues:

Representations relating to the overall strategy for the Rural Areas are considered in the response to the Strategy for Development Document.

This policy was written before the Coalition Government's initiative "the Community Right to Build" was proposed. Communities with a 75% vote in favour of a development (that is 75% of those who voted) will be able to build without planning permission. It may be necessary to reconsider the wording of Policy CS34 once further details are provided in the Localism Bill/Act. A minor change to the supporting text will be made to reflect this.

Potential housing sites will be considered in the future Sites and Policies DPD. However the details in the Coalition Government's "Community Right to Build" initiative may influence how rural development is considered in the future DPD. A minor change to the supporting text will be made to reflect this.

No change is proposed to the text of the Core Strategy in response to the comments relating to Parish Plans. However it will be necessary to consider in the context of the implications of the Localism Bill/Act how to ensure that Parish Plans are prepared in a transparent, inclusive and consistent manner and cover essential spatial planning matters.

Other points:

Minor changes to the wording of Policy CS34 and supporting text have been made to take on board a number of detailed points which are considered to be acceptable, will improve the clarity and implementation of the policy and are in line with the strategy for the rural areas and national planning guidance. This also includes reference to the Coalition Governments 'Homes on the Farm' new initiative.

A number of the representations relate to detailed Development Management matters, others to issues that are addressed elsewhere in the Core Strategy or in Government guidance or are considered to be adequately covered by the existing Core Strategy Policy and supporting text or a saved Local Plan policy. Other objections would be contrary to the strategy for South Gloucestershire and some requests have not been supported by evidence. For these reasons it is not considered appropriate to amend the policy or supporting text to take into account these objections.

Proposed Changes – PC203 – PC207

Policy CS35 – Severnside and paragraphs 17.1 – 17.23

A total of 26 representations were made to the Severnside chapter. The Parish Council did not comment however representations were received from elected members.

General comments

A number of statutory and non-statutory stakeholder organisations commented on the strategy for Severnside. Bristol City Council suggested a need for increased reference to cross-boundary working.

The Environment Agency raised significant concerns regarding further development increasing flood risk to third parties. Strategic flooding issues require resolution before site specific Flood Risk Assessments should be required. Piecemeal development should be avoided until strategic infrastructure is secured. It was suggested that South Gloucestershire Council should work with Bristol City Council to complete Phase 4 of the Avonmouth/Severnside Flood Risk Study which should inform the Core Strategy.

The South West Regional Development Agency supported the Council's approach to Severnside stating that it is a nationally significant area of strategic employment which has potential for enhancement. The Bristol Port Company also supported the overall strategy for Severnside, although they did raise other issues such as the deliverability of necessary transport infrastructure to overcome congestion, as well as suggesting that the Core Strategy should not just focus on the constraints but also the advantages of Severnside for further development.

The Highways Agency requested the insertion of a requirement to ensure the Strategic Road Network is protected. They also raised doubts over the deliverability of a new M49 junction.

One comment was received from a member of the public concerning the potential effects of continued development on nearby residents. A number of comments were also received recommending minor changes.

Policy CS35 and supporting text:

The Regional Development Agency suggested that Policy CS35 should lead development at Severnside rather than relying on landowners/developers.

Objections were received from landowners and developers to the pre-requisite for a comprehensive strategy, due to difficulties in reaching consensus between different partners. They stated that flood defences and road infrastructure should not be funded by developers alone and that acceptable employment uses should be clearly defined. Two representations were received requesting that Severnside should cover a larger area to facilitate housing and renewable energy development. Alder King (for Scottish Power) requested that reference be made to the delivery of a new Combined Cycle Gas Turbine (CCGT) power station at Severnside.

Natural England suggested that the policy should be amended to recognise the estuary's legal protection and the Council's responsibility for protecting its conservation interests. Avon Wildlife Trust supported the creation of Local Nature Reserves. Transport 2000 suggested that more use should be made of Pilning Station to serve Severn Beach and Severnside.

Local Members suggested a number of alterations to the chapter, including making reference to the Highways Agency in the delivery section and adding reference to the re-opening of the Henbury loop to serve commuter traffic.

Comments were received regarding references to biodiversity and the need for correct terminology and phraseology in relation to the habitats regulations.

Response

Severnside is a heavily constrained area that has historical planning permission for continued employment development. The technical and financial implications of overcoming the constraints and realising the potential of the area are under active investigation as part of the ADZ/TIF bid process. The policy as drafted calls for a comprehensive and coherent masterplan/strategy approach to co-ordinate development. While various issues and concerns have been noted and amendments made to the supporting text, no fundamental change is required to the policy or overall strategy. Minor amendments have been made to the chapter regarding partnership working with Bristol City Council, ecology and the Habitats Regulations, flooding and transport. A factual update has also been made outlining the intention of a developer to promote a new power station at the former Grown How site. For clarity, a map showing the extent of the Severnside area is being included.

Subject to the adoption of the Core Strategy, as a result of the introduction of this policy and the deletion of SGLP Policy E2 there is a consequential change required to the Proposals Map, this is set out in the 'Schedule of Changes'.

Proposed Changes – PC208 – PC231

Chapter 18 – Major Infrastructure Projects – New Policies CS36 and CS37

26 objections and 8 statements of support were made to Chapter 18.

Statements of support:

- Support in relation to the Council's approach towards Major Infrastructure proposals in the area and its position.
- Support for no nuclear power
- Suggestion for further Severn Barrage discussions.

Objections related to:

- the need for updating and corrections to be made to the text following recent developments,
- inclusion of all key concerns raised in the Council's response to the draft NPS's
- suggestion for a policy to be included in this chapter.
- the Council being premature in its assessment of the impacts of potential development as these cannot be examined until details are known
- question over the justification for a community benefit fund amounting to 10% of build cost – argued as excessive.
- the Council should commit to a review of the Core Strategy in the event that the Oldbury on Severn nuclear power proposals are included in the final Nuclear NPS.

Response

It is now considered that a policy should replace a large amount of the text previously in the chapter in order to ensure that if development proposals come forward, the developer is committed to providing certain information and details to the local planning authority in respect of the proposals. The supporting text has been updated to reflect the latest position.

Due to the nature of this topic, things have moved on since the chapter was last drafted and amendments need to be made to reflect this. Given such developments, the decision to move away from a text only to a text and policy approach was taken in order to reflect the changing national agenda. There is no overall change to the Strategy. The purpose of the policy is to ensure there is a framework to work within and negotiate with developers when proposals come forward. Without this, the Councils input would be limited.

Proposed Changes – PC232

Chapter 19 – Implementation and Monitoring, 19.1 – 19.3

4 objections were received in relation to Chapter 19. 2 objections were received from elected members, 1 from a statutory consultee and 1 from a special interest body. One statement of support, from a statutory consultee was also received.

The main issues raised were:

- Network Rail should be added to the “Lead Agencies” column of Table 4 under Policy CS35;
- The policies should be monitored annually;
- Concern over the effectiveness of the proposed monitoring of sport and recreation.

Response

The Council agrees to add Network Rail to the “Lead Agencies” column of Table 4 under Policy CS35.

Policies are monitored annually through the Annual Monitoring Report referred to in paragraph 19.4, therefore there is no change required to the Plan.

Details on the monitoring of sport and recreation is set out in Appendix 5 and further details will also be included in the Green Infrastructure Supplementary Planning Document, referred to under Policies CS2 (Green Infrastructure) and CS24 (Open Spaces Standards).

Table 4 needs to be updated to make consequential changes following changes made elsewhere to policy titles and text and potential implementation mechanisms. The Pre-Submission publication draft of the Core Strategy included a paragraph on monitoring but omitted measures for monitoring the policies. A new table (Table 5) has now been prepared, together with additional text to rectify this omission.

Proposed Changes – PC233 – PC237

Glossary of Terms

4 representations were received to the Glossary of Terms requesting updating and the addition of other terms.

Response

The Council will amend and add further terms where this adds to the clarity of the Core Strategy.

Proposed Changes – PC238 – PC247

Appendices and Key Diagram

Appendix 1- List of Local Plans and Strategies

1 representation received from Avon Wildlife Trust requesting the inclusion of an omitted document.

Response

Agree to add the Avon Biodiversity Action Plan to Appendix1.

Proposed Changes – PC248

Appendix 2 - Table of Replaced Local Plan Policies

1 objection has been made by Friends of Suburban Bristol Railways to Appendix 2 - Table of Replaced Local Plan policies. The representation considers that South Gloucestershire Local Plan Policies T1 (Railway passenger Services and Facilities) and Policy T2 (Retention of Rail Track Beds and Associated Land for Future Public Transport/Rail Freight Use) should be retained, since they are generally stronger than the equivalent policies in the Core Strategy.

Response

It is considered that the rail issues covered by Local Plan Policies T1 and T2 are adequately covered by Policies CS7 and the relevant Core Strategy Area Policies.

Amendments proposed to Policy CS9 (Environmental Resources and Built Heritage), in order to address a representation from the Coal Authority, replace Local Plan Policy EP7. Local Plan Policy EP7 is therefore proposed to be added to Appendix 2 Table A1, should the proposed amendments to CS9 be accepted.

Proposed Changes – PC249

Appendix 3 - Green Infrastructure Assets

Representations received relating to Appendix 3 are considered in the Policy CS2 (Green Infrastructure) Document.

Proposed Changes – PC250

Key Diagram

2 representations were received referring to the Key Diagram. 1 representation, from a developer, indicates that land to the east of the M49 which benefits from an extant 1957 planning permission should be recognised as forming part of the “Sevenside Committed Site” on the Key Diagram. The other representation, from Friends of Suburban Bristol Railways, requests that 10 railway stations which the group proposes should be opened are shown on the Key Diagram.

Response

The Council agrees to amend the Key Diagram to accurately reflect the extent of the 1957 planning permission in the “Sevenside Committed Site”.

All but two of the railway stations identified in the representation do not form part of the transport strategy of the Core Strategy and therefore should not be included on the Key Diagram. Two of the stations, Henbury and Charfield, are shown in Figure 2 (Strategic Transport Infrastructure Proposals Diagram) and identified in the Core Strategy as being safeguarded for possible future opening subject to further investigation and should be shown on the Key Diagram.

Proposed Changes – PC253

General issues

These representations relate to matters of a general nature, policy omissions or those comments which don't fall within a particular chapter, such as those relating generally to the evidence base.

22 objections and 11 statements of support were received.

The main issues raised were:

- Support the need for concept statements for new neighbourhoods and housing opportunities;
- Welcomes the Core Strategy as it provides a coherent and positive framework for shaping and managing future development;
- A statement was received from GWE Business West, stating that the business community supports the joint working between authorities;
- General comment on, the need to be consultant with the Civil Aviation Authority, electrical distribution and the national grid;
- Lack of published evidence, e.g. sport facilities strategy has not yet been completed;
- General concerns about the adequacy of flooding studies and the assessment of flood risk. Concern that the Bristol Avon Catchment Flood Management Plan dated 2007 is still in draft form [For information this has now been adopted.];
- A general comment about re-using empty buildings, conversion rather than demolition, and desire to see new homes built to lifetime homes standard;
- The Core Strategy should be revised to incorporate a more realistic view of the deliverability of the major infrastructure needed to support development;
- General comment on the need to recognise that minority groups can benefit from connections with Bristol.
- Concern about the approach the Core Strategy has on transport and climate change;
- The Core Strategy is unclear for the lay person to follow and the maps do not show clearly enough where development will occur;
- Policy omissions:

- Policy to allow the refusal of outdoor heaters, on environmental grounds;
- Desire from the NHS for the Core Strategy to support the use of Health Impact Assessments;
- Protection and enhancing of sport and recreation facilities;
- Policy on the Low Impact Developments;
- Houseboat moorings

Response

General support has been noted from a range of individuals, organisations and developers, as have the points of clarification relating to utility providers/infrastructure.

The overall strategy should not be altered as a result of these representations. No additional policies are recommended as the points raised are covered by saved Local Plan policies, development management processes, would be contrary to the overall strategy, or are too detailed to be contained within a Core Strategy. It is considered that the Core Strategy is sufficiently detailed and clear to address its wide audience. The supporting evidence and highlighted infrastructure requirements (including the comprehensive details contained within the IDP) do adequately provide the necessary detail to allow the Core Strategy to be taken forward to examination. The Core Strategy is clear on its objectives for transport, climate change, and housing/design.

Summary of Representations to the Sustainability Appraisal Report and Appendices

16 objections were received in relation to the Sustainability Appraisal; together with around 500 standard representations forms (printed by Save Thornbury's Green Heritage) relating to sustainability issues identified in the appraisal of alternative locations at Thornbury. Of the 16 objections received, the majority were made by those acting for developers/landowners. Comments were also made by Thornbury interest groups, a service provider, a statutory consultee and local residents. One statement of support has been received from Thornbury Town Council agreeing with the approach taken to appraise the possible sites for new housing in the town and the positives and negatives identified.

The main issues raised in the objections were;

- The SA failed to justify the provision of land for 21,500 dwellings;
- The SA failed to consider alternative development strategy options, including option for additional development in the rural areas;
- The SA will need to be updated in response to the revocation of the RSS, the need to increase housing numbers and distribution;
- The need to address more adequately matters relating to Appropriate Assessment.

Other points made were:

- Detailed comments disputing detailed aspects of individual location/site appraisals and lack of consistency between appraisals.

Response

Main issues:

The purpose of the SA is to demonstrate how various options have been appraised. It is proposed that the SA Report be amended to incorporate the appraisal of 5 alternative development strategy options to address representations. Following discussions with English Nature it is proposed to delete the Appendix 3 (Appropriate Assessment Screening Report) of the SA Report and replace this with a more in depth Habitat Regulations Assessment Screening Report to be published as a separate technical report forming part of the Core Strategy evidence base.

Other points:

The SA Report has been updated to take account of the need for factual updating taking into account new information, correcting typographical and grammatical errors, consequential changes required following amendments made to the Core Strategy and for clarification purposes, including the provision of additional information to ensure consistency and to address individual representations.

Proposed Changes - The proposed changes to the SA Report, March 2010 are to be shown as track changes in the new "Core Strategy SA Report, March 2010 with December 2010 updates".

The proposed changes include additional information in Section 4 of the SA Main Report relating to the need for some additional housing development at Thornbury and the appraisal of different location options. Appendices 10 and 11, which contain detailed appraisal matrices for broad areas of search and site options, have also been re-drafted to include more detailed information. The overall findings of the SA Report are unchanged.

Appendix 3 (Appropriate Assessment Screening Report) of the SA Report is to be replaced by a Habitat Regulations Assessment Screening Report to be published as a separate technical report forming part of the Core Strategy evidence base.