

**PSM15**

**South Gloucestershire  
Core Strategy  
Examination**

**Position Statement  
for  
Matter 15:  
Environment, Heritage**

**May 2012**

## **Matter 15 – Environment, Heritage**

### **Q1 Is Policy CS9 sufficiently comprehensive in setting out criteria to protect the natural and built environment?**

Council Response – Yes.

- 1.1 Policy CS9 is an overarching policy which sets out the Council's approach, at a strategic level, to the management of the environment and heritage in South Gloucestershire. Further detailed non-strategic policies relating to the various elements covered by Policy CS9 are set out in the South Gloucestershire Local Plan. These will be replaced by policies in the Policies, Sites and Places DPD.

### **Q2 Is the Council's approach consistent with the guidance in the Planning Framework?**

Council Response – Yes, subject to the modifications identified in Appendix A

- 2.1 The Council is confident that the approach taken in Policy CS9 is consistent with the guidance provided in the National Planning Policy Framework (NPPF) when the suggested changes in Appendix A are taken into account. However, owing to the role of the CS as a strategic document, there are elements of the NPPF relating to issues of a non-strategic nature which will be addressed through the Policies, Sites and Places DPD.
- 2.2 Policy CS9 takes a proactive approach to the reduction and management of flood risk consistent with that set out in the NPPF, directing development away from areas at high risk of flooding and areas where the risk of flooding is likely to increase through climate change. Where development is necessary, the Council expects it to reduce and manage the impact of flood risk through location/layout, use of materials, use of SuDS and positive land management (this approach is also supported through Policy CS2).
- 2.3 When taken with the suggested changes in Appendix A, Policy CS9 is consistent with the NPPF in its promotion of the conservation and enhancement of the natural and built environment, by:
- protecting the environment, buildings and people from potentially polluting development or land uses
  - encouraging the use of previously developed (brownfield) land with safeguards to ensure that land with issues relating either to contamination as a result of its previous use, or its stability, is subject to relevant remedial works to ensure its safety.
  - acknowledging the important role that previously developed (brownfield land) can play in terms of biodiversity, especially within urban areas. With this in mind, Policy CS9 expects development proposals to include appropriate mitigation

measures to ensure that biodiversity is protected; proposals which would result in a significant loss of biodiversity will not be permitted.

- acknowledging the importance of the best and most versatile agricultural land as a resource and directing development away from such areas
- setting out the Council's approach to planning for the creation, protection, enhancement and management of networks of biodiversity and Green Infrastructure (GI) in combination with Policies CS2 and CS1.
- protecting the undeveloped coastal zone in South Gloucestershire in recognition of its importance to species, landscapes and habitats of local, national and international significance as well as its risk of flooding
- affording great weight to the conservation and enhancement of the unique character, tranquillity and special qualities of the Cotswold Area of Outstanding Natural Beauty (AONB). Any proposals for development will be expected to take the objectives of the Cotswold AONB Management Plan into account.
- protecting sites of importance in terms of biodiversity and geodiversity from any potential harm resulting from development and, where appropriate, enhancing them
- acknowledging the importance of protecting and enhancing the historic environment in a manner appropriate to its significance and the positive contribution that it makes to local distinctiveness and character, as well as the wider social, cultural, environmental and economic benefits that conservation of the historic environment can bring
- setting out the Council's commitment to periodically reviewing heritage assets including conservation areas, the local list and the Buildings at Risk register, and support for applications for enabling development where assets are deemed to be at risk and where a conservation deficit is identified
- promoting the sustainable use of natural resources

**Q3 Is there sufficient coverage in the CS of the Council's position in relation to woodland including ancient woodland?**

Council Response – Yes.

- 3.1 Policy CS9 sets out the Council's general approach to environmental resources and heritage assets. It is considered that this policy covers an extensive breadth of resources, and that the approach to preserve, respect and where appropriate, enhance, sites of (*inter alia*) arboricultural importance adequately covers ancient woodlands,
- 3.2 In addition, the Council's position in relation to new and existing Green Infrastructure (GI), of which woodland is an identified asset, is set out in Policy CS2, which seeks to: protect and enhance species and habitats (objective 4), and conserve and enhance landscape character, historical, natural, built and cultural heritage features (objective

5). These objectives are imbedded in the planning and policy wording relating to the Area-based policies in Part 2 of the Core Strategy.

- 3.3 Furthermore, Policy CS1 (High Quality Design) requires development proposals to demonstrate that features of landscape, nature conservation, heritage or amenity value – any of which could relate to woodland, will be safeguarded and where possible enhanced (criterion 3). Supplementary to this, proposals for developments of a certain scale or significance will be expected to show how account has been taken of the GI Objectives set out in Policy CS2, and the Landscape Character Assessment amongst other documents/guidance.
- 3.4 Also worthy of note in relation to ancient woodland, South Gloucestershire’s ancient woodland sites are designated as SNCIs and as such are subject to the saved South Gloucestershire Local Plan Policy L7. This policy will in future be superseded by the Policies Sites and Places DPD.

## Appendix A

### Suggested Modifications on Matter 15

Policy / para	Proposed Modification	Justification	Main (M) or Additional (A) Modification
Objectives (p25 & 74)	➤ Conserving and enhancing the character and distinctiveness of the district's heritage assets and maximising their contribution to quality of place <u>and the wider benefit of the district.</u>	Reflect the NPPF	A
Policy CS9 (p75)	<b>1. ensure that sites, heritage assets and landscapes of archaeological, historical, ecological, arboricultural and geological importance, are preserved, respected and <del>where appropriate</del>, enhanced <u>in a manner appropriate to their significance;</u></b>	Reflect the NPPF	A
Para 8.7 (p76)	South Gloucestershire has an important legacy of heritage and cultural assets, including over 2000 listed buildings, approximately 1500 locally listed buildings, <del>301</del> conservation areas, 8 registered historic parks and gardens, <del>357</del> scheduled monuments and a wide range of undesignated historic buildings, archaeological sites and remains, and historic parks and gardens. These assets make a significant contribution to the identity of the locality in which they are set, helping to create a sense of place. <u>New development should seek opportunities to draw on the historic environment in order to maintain and enhance local character and distinctiveness.</u>	Update figures  Reflect the NPPF	A
Para 8.7a (p76)	The Council will periodically appraise heritage assets including Conservation Areas, and its list of locally listed buildings in order to ensure that these <del>designated</del> heritage assets are properly recognised and protected. <u>The Council will periodically assess its buildings at risk register in order to identify heritage assets at risk though neglect or decay.</u> Where heritage assets are deemed by the Council to be at risk ( <u>but not as a result of deliberate neglect</u> ), <u>and a conservation deficit is identified</u> , the Council will support the submission of enabling development proposals accompanied by detailed financial appraisals in accordance with English Heritage guidance, 'Enabling Development and the Conservation of Significant Places' (English Heritage 2008), which aims to balance any potential harm to the heritage values of the place and its setting and is the minimum necessary to secure the future of the place with the public benefits of development.	Reflect the NPPF	A