

South Gloucestershire Local Plan

Phases 1 & 2 Consultation and Engagement Report

December 2023

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Introduction, purpose and context

The new Local Plan has been widely consulted on through two key phases of stakeholder engagement between 2020 and 2022. A third phase of engagement on the South Gloucestershire new Local Plan Phase 3 – Towards an Emerging Preferred Strategy (Reg 18), is taking place between 6th December 2023 and 7th February 2024.

This December 2023 Consultation and Engagement Report will form part of a Consultation Statement produced under Regulation 22(1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 at the point of submitting the plan for independent examination to demonstrate how the Plan has been shaped by early, proportionate and effective engagement. Consultation and engagement have also been undertaken in accordance with the Council's adopted Statement of Community Involvement (SCI).

South Gloucestershire Council has recognised the need to increase digital engagement with all stakeholder groups and ensured that as many aspects of the plan, and the engagement process, have been made available online as possible. This has involved interactive mapping, videos, online survey methods and social media interactions.

Substantial input from stakeholders has been received, including from the following groups:

- Members of the public
- Businesses
- Developers, land agents and site promoters
- Charities
- Community Groups
- Local Councillors
- Town and Parish Councils
- Statutory bodies
- Neighbourhood Planning Groups

The following report sets out the detail of the two key phases of engagement undertaken so far, providing information on the activities, communications and stakeholder groups engaged. This demonstrates the extensive opportunities which have been provided for input into the process, ensuring the South Gloucestershire new Local Plan complies with all necessary regulation and is widely supported by stakeholders. The report also provides brief summaries of responses received from stakeholders at both stages of the consultation process, and notes the percentages of respondents with both positive and negative views on each policy area.

Compliance with the Duty to Co-operate (DtC)

We identified and contacted those organisations the Local Authority has a Duty to Co-operate with and other key stakeholders in August 2020 to inform them that we had started preparation of our Local Plan 2020, following confirmation of the withdrawal of the West of England Joint Spatial Plan (JSP) from examination. We then invited our statutory DtC partners and key stakeholders to respond as part of engagement on the first two informal phases of consultation (Phase 1 in 2020/21 and Phase 2 in 2022).

The decision of the WECA Mayor on 9th May 2022 to halt all work on the West of England Combined Authority Spatial Development Strategy (SDS) changed the scope and timetable of the South Gloucestershire Local Plan which will now need to provide the strategic planning framework.

In December 2022 we contacted our DtC partners with individual letters to update them on the new scope of the plan following the withdrawal of the JSP, seeking their comments on key cross boundary issues we identified for each contact and inviting them to work with us on these issues.

Since December 2022 we are continuing with ongoing active engagement with these partners in the preparation of the Phase 3 consultation and this will continue to the next phase. This engagement will involve the preparation of Statements of Common Ground as appropriate.

Our approach to engagement

The council's approach to engagement during the 2 early phases of the Local Plan was to encourage and enable a broad range of stakeholders to understand and respond through the online consultation process.



The engagement was widely promoted to the general public via the Council's website, social media (Council Facebook, Twitter and Linkedin), disseminating information through the network of Parish and Ward councillors, the Community Engagement Forum network, events, and those individuals, groups and businesses who had signed up to receive updates on the Local Plan were notified by email.

Statutory bodies and those organisations the Local Authority has a Duty to Co-operate with were informed by email and invited to respond. Other methods used to engage people included animations, online events and press releases.

The first phase of Local Plan engagement took place between 27th November 2020 and 1st March 2021.

The Phase 2 Consultation was undertaken between 7th February 2022 and 4th April 2022.

As of December 2023, Phase 3 of the engagement is underway (December 6th 2023 - February 7th 2024).

Both the previously undertaken consultations were carried out in the context of the COVID pandemic which presented some limitations to methods of consultation. Phase 1 in 2020-2021 had to be a wholly digital process due to restrictions on face-to-face meetings. Phase 2 in 2022 was a mixture of digital and in-person events as restrictions were being lifted but many people preferred to continue to use online methods.

Our strategy for engagement was to inform as wide a range of stakeholders as possible about the content of the consultation document and encourage and enable representations through the formal engagement process. This involved a number of communications, as follows:

- **Phase 1:** A series of animated videos were provided to introduce key parts of the plan. These 5 videos were viewed a total of 2,807 times on YouTube South Gloucestershire Local Plan 2020 – YouTube
- **Phase 1 and 2**: Holding a series of well attended events across the district for the public and local community groups to attend, view maps and ask questions as well as receive details of how to respond to the consultation. For Phase 1 these were online and for Phase 2 a mixture of online and in person events as listed in the tables below.
- **Phases 1 and 2**: The c1,500 stakeholders on our Local Plan database were notified with all the details of the consultation directly via email. In addition, c1,000 stakeholders on the Council's Community Engagement Forum database also received an email with details of consultation and an invitation to attend online events. We also identified contacts representing specific stakeholder groups and offered to hold separate briefing and Q&A sessions with them.
- **Phases 1 and 2:** The consultation documents relating to both Phases were available as a digital documents, with expandable images and plain English content. Phase 1 and Phase 2
- **Phases 1 and 2:** Articles and press releases were written for the local Voice publications and for digital newsletters, including the South Gloucestershire Council e-bulletin which reaches thousands of local households.



- **Phase 2:** Using our elected members, and town and parish councils as "ambassadors" to actively promote the Local Plan consultation in their communities. All were invited to several presentations before and during the consultation period on the content of the plan with Q& A. All were provided with written details of the plan and consultation process and events together with material to promote the consultation to their communities. This included a PDF of the consultation document as well as 1000 post cards and posters with details of consultation events and how to respond.
- **Phase 2:** Extensive use of social media was made including gifs and icons to promote different parts of plan and promote face to face consultation events. This outreach resulted in 3,400 document page visits on the website, and 10,000 visits to mapping pages. The social media campaign involved regular planned messaging and posts and reached 185,100 people.

Phase 1: Issues & Approaches (Regulation 18) 27/11/2020 – 01/03/2021

Key Phase 1 Engagement Activities

The table below demonstrates an overview of all the key consultation activities in the first phase of the Plan's preparation, which alongside the communications noted above, enabled stakeholders to understand and provide views on the Plan. Engagement activities sought to provide presentations, information and answer questions, and to encourage a broad range of stakeholders to provide their views via online or paper questionnaires. These views were then analysed in order for them to influence plan preparation.

Date	Activity	Stakeholders Engaged
05/12/2020	Member pre-release briefing email	South Gloucestershire Councillors, Parish and Town Councils (Councillors and Clerks)
08/12/2020 09/12/2020 15/12/2020 16/12/2020	Online Councillor briefings	South Gloucestershire Councillors, Parish and Town Councils (Councillors and Clerks)
18/01/2021	Presentation and information at the online meeting of the SG Over 50's Forum	South Gloucestershire Over 50's Forum (Equalities group)

Date	Activity	Stakeholders Engaged
28/01/2021	Presentation, information and Q&A session	Bristol Property Agents Association (Economy group)
20/01/2021	Presentation, information and Q&A session provided at online meeting	Business West - Planning, Transport and Climate Change Group (Economy group)
22/01/2021	Presentation, information and Q&A session provided at online meeting	South Gloucestershire Local Strategic Partnership (Community Forum)
27/01/2021	Digital drop-in event to provide information/ Q&A	Community Engagement Forum - North Fringe Focus (General public)
03/02/2021	Digital drop-in event to provide information/ Q&A	Community Engagement Forum - East Fringe Focus (General Public)
04/02/2021	Digital drop-in event to provide information/ Q&A	Community Engagement Forum - Rural Focus (General Public)
20/01/2021	Online meeting	AONB Board Meeting (Environment group)
26/01/2021	Town and Parish Forum	Town and Parish Councils

Date	Activity	Stakeholders Engaged
02/02/2021	Adjoining Local Authorities Duty to Cooperate Meeting	Local Authority partners
03/02/2021	Affordable housing meeting, Homes West	Affordable housing providers
12/02/2021	Meeting with Shelter	Housing charity
03/02/2021	Presentation and Q&A at the Town and Parish Councils Forum	Parish and Town Councils (Councillors and Clerks)

All representations were made available to view online, by question and section of document. South Gloucestershire New Local Plan Phase 1 Responses - South Gloucestershire Online Consultations (southglos.gov.uk)

Phase 2: Urban, Rural and Key Issues - 07/02/2022 - 04/04/2022

Key Phase 2 Engagement Activities

A record of events and activities is set out in the table below. As detailed above, Phase 2 enabled more face-to-face interaction and varied communication with stakeholders due to fewer Covid 19 restrictions.

Date	Activity	Stakeholders Engaged
01/02/2022	**SGC Community Engagement Forum** Email notification with details of proposed consultation to give early warning of the scope/detail of consultation. 2 Digital briefings and Q&A sessions	SGC Councillors, T&P Councillors and clerks
09/02/2022	**Follow up email** Details of consultation document, PDF postcard and engagement posters for local distribution, copy of PP shown at pre consultation events and details of all face-to-face consultation events **Purpose**: to enable and encourage local parish and town councils to advertise the consultation to their communities, to encourage them to attend consultation events and take part in the formal consultation process.	SGC Councillors, T&P Councillors and clerks
07/02/2022	**Email to all Inovem Contacts** with details of proposed consultation	Local Plan consultation list: All 1,500 stakeholders who have expressed

Date	Activity	Stakeholders Engaged
	Purpose: to formally announce details of the consultation to the 1500 stakeholders on our Local Plan database.	an interest in the Local Plan including "Duty to Cooperate" partners.
17/02/2022	**2 open online events** for members of the public and local groups with presentation on the content of the plan and Q&A	SGC Community Engagement Forum, members of the public, interest groups
15/02/2022	**Pop up consultation event** Morrisons Cribbs Causeway **Purpose:** to provide an opportunity to take away details of the digital consultation process, view consultation material and discuss with Local Plan and specialist officers to encourage representations.	Members of the public
18/02/2022	**Pop up consultation event** Longwell Green Leisure Centre **Purpose:** To provide an opportunity to take away details of the digital consultation process, view consultation material and discuss with Local Plan and specialist officers to encourage representations.	Members of the public
22/02/2022	**Consultation event** Willow Brook Centre Bradley Stoke **Purpose:** To provide an opportunity to take away details of the digital consultation process, view consultation material and discuss with Local Plan and specialist officers to encourage representations.	Members of the public

Date	Activity	Stakeholders Engaged
25/02/2022	**Consultation event** Tesco's Extra, Yate **Purpose:** To provide an opportunity to take away details of the digital consultation process, view consultation material and discuss with Local Plan and specialist officers to encourage representations.	Members of the public
28/02/2022	**Email to all Inovem contacts** with details of extension to time period of consultation to 04/04/2022	Local Plan consultation list
01/03/2022	**2 open online events** for members of the public and local groups with presentation on the content of the plan and Q&A	SGC Community Engagement Forum, members of the public, interest groups
03/03/2022	**Consultation event** Kings Chase Shopping Centre, Kingswood **Purpose:** To provide an opportunity to take away details of the digital consultation process, view consultation material and discuss with Local Plan and specialist officers to encourage representations.	Members of the public
07/03/2022	**Consultation event** Little Stoke Park, Stoke Gifford **Purpose:** To provide an opportunity to take away details of the digital consultation process, view consultation material and discuss with Local Plan and specialist officers to encourage representations.	Members of the public

Summary of Main Issues Arising from Regulation 18 Consultation

Introduction

This section provides concise summaries of the responses received in the two phases of consultation. All consultation responses were collated, analysed and thematically grouped, initially creating long-list summaries by each separate stakeholder group to each question. Following this process, after each phase of consultation, concise summaries were created to highlight the key issues raised by stakeholders. These are set out below in the two consultation phases, noting the questions which stakeholders were asked in the consultation, and providing a concise record of issues.

The large amount of information received from stakeholders has all been considered and has substantially influenced the development of the new Local Plan. Information on how consultation has influenced the plan will form part of a Consultation Statement produced under Regulation 22(1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 at the point of submitting the plan for independent examination to demonstrate how the Plan has been shaped by early, proportionate and effective engagement.

Phase 1

Q2 & 3 Key Issues
Q 4 & 5 Priorities
Q. 6&7 Building Blocks
Q. 8&9 Guiding Principles
Q. 10&11 Urban Lifestyles Approach
Q. 12&13 Urban Lifestyle Locations
Q 14&15 Do you agree with the proposed rural approach
Q16 Any other rural planning issues to consider?
Q17&18 Scope and range of policies
Q. 19&20 Climate Change Mitigation and Adaptation
Q. 21&22 Energy Management in New Development
Q. 23&24 Renewable and Low Carbon Energy Systems

Q. 25&26 Creating well-designed places
Q. 27&28 Parking Requirements, including Electric Vehicles
Q. 29&30 Nationally Significant Infrastructure Projects (NSIPs) and Related Development
Q. 31&32 Nuclear New Build
Q. 33&34 Oldbury A Station- Decommissioning
Q. 35&36 Radioactive Waste

Phase 2

Q2. Urban Lifestyle areas and density ranges
Q3. Urban Locations and Sites
Q4. Safeguarded Employment areas
Q5. Community Led growth
Q6. DO you agree with the list of villages
Q7. Initial Groups for rural growth
Q8. Other policies for rural areas
Q9. Renewable Energy
Q10. Solar Energy
Q11. Wind Energy
Q12. Community Energy Proposals
Q13. Strategic GI Network
Q14. Strategic Green Infrastructure and Environment
Q15. Houses in Multiple Occupation (HMOs)
Q16. Urban Lifestyles and Density
Q17. Biodiversity Net Gain
Q18. Rural Exception Sites and Community Led Rural Housing
Q19. Management and maintenance of public open space

Phase 1 Consultation

Q2 & 3. Key Issues

Would you like to comment on any of the issues or add new issues? Please note the name of the issue in your comments, or tell us what additional issues you think our plan should consider?

Yes 166 (73%)	No 42 (19%)	Don't know 18 (8%)

Summary of Comments

- There was wide-ranging support for the range and scope of issues identified and recognition that all are relevant to developing the new Local Plan for South Gloucestershire – however, there were different views about the relative importance of some themes and issues.
- Members of the public, South Gloucestershire councillors, parish councils and community groups were supportive of issues identified under the climate change, environment and health and wellbeing themes with concerns about protecting local character, heritage, wildlife and green infrastructure.
- Whilst the need for new housing was recognised, there was a view from some within these groups that we should not be meeting the needs of Bristol within South Gloucestershire.
- There were mixed views on development in the Green Belt from those that thought it should be protected at all costs, those that thought other options should be investigated first, to those who thought some change and release of Green Belt might be needed.
- Representatives of the development industry recognised and supported climate change and environmental issues and the need for good design but also supported the need to meet our identified housing needs in full – there was a view that it will be necessary to build in brownfield, green field and Green Belt locations to deliver the amount of homes we need.
- There were detailed comments on the wording and content of some of the issues.

Q 4 & 5 Priorities

Do you agree with the potential priorities?

Do you have any comments on the potential priorities?

Yes 130 (61%)	No 56 (26%)	Don't know 27 (13%)

Summary of Comments

- Priorities should be weighted according to importance with different views about which are most important – developers and some businesses supported meeting needs for both homes and employment land identified in the West of England Spatial Development Strategy (SDS) as most important and considered that Green Belt and greenfield land would be required to meet these needs, members of the public and others would like more weight given to carbon neutrality, protecting the environment, protecting the Green Belt and flood plain from development and community benefit and involvement.
- Climate change and health and well-being issues should be overarching key priorities as they are cross cutting themes.
- Support the urban focus and regeneration strategy and that this should be a priority.
- Support for some appropriate growth in rural areas.
- Support for locating development in areas where there is existing good walking cycling and public transport access to a range of services and facilities and employment or where this can be provided.
- Support for provision of appropriate infrastructure alongside new development from members of the public and others. The development industry also supported but raised issues about the impact on viability.

Q. 6&7 Building Blocks

Do you agree with the five building blocks (Urban Areas, Urban Extensions, Market Towns, Rural Villages, New Settlements)?

Do you have any comments on the five building blocks (Urban Areas, Urban Extensions, Market Towns, Rural Villages, New Settlements)?

Yes 106 (52%)	No 73 (36%)	Don't know 26 (13%)

Summary of Comments

- There was general recognition that elements of all building blocks would be needed as part of our strategy for growth and change.

- Nearly all stakeholders supported the principles of urban lifestyles and utilising urban land and land within our market towns as effectively as possible, though it was flagged that higher density would not always be suitable and the approach needed to be different depending on the location across our urban areas and within our market towns.
- Communities which have experienced recent growth within and around our market towns and rural villages where speculative development has occurred were concerned about the impacts of further growth on infrastructure, character and quality of life in those locations.
- Concern from a range of stakeholders that new free standing settlements can be problematic to deliver, with long delivery times, though some considered them a potential route of delivering a large number of homes.

Q. 8&9 Guiding Principles

Do you agree with the initial guiding principles?

Do you think we have missed any key, initial guiding principles?

Yes 108 (53%)	No 60 (29%)	Don't know 37 (18%)

Summary of Comments

- It is inappropriate to pre-determine principles for a spatial strategy at the local level in advance of a draft SDS and associated evidence base (including the sustainability appraisal).
- Important to reflect the SDS emerging evidence base on the need for employment land and the deliverability of particular locations having regard to market signals.
- The need for a review of the Green Belt, however this review should not be an opportunity to increase housing allocations – some support for a proportion of Green Belt land being released to achieve an acceptable quantum of housing.
- Guiding principles should recognise the potential role of new development in enhancing and strengthening these principles as opposed to simply seeing them as constraints that require protection from new development.
- Consideration should be given to expressing the guiding principles in priority order.
- The most sustainable locations in South Gloucestershire are often urban fringe locations, or settlements that benefit from good transport links to the Bristol urban area.
- The guiding principles should allow for the potential for new housing to be developed in areas that may not have excellent public transport connections but could support the general day to day needs of new residents using a combination of local services and facilities and delivery services.

- Development must be provided with infrastructure and the council should clarify that supporting infrastructure required is viable and achievable.
- Areas at highest risk of flooding should be avoided along with environmental assets of most importance such as the AONB and Special Protection Areas, Special Areas of Conservation and Ramsar sites (These three types of site are sites of international importance for wildlife and habitats and protected under a range of national and international legislation).
- The guiding principles need to consider the change in lifestyle and travel to work patterns that have accelerated over the last year due to Covid-19.
- Consideration should be given to the strategic context of Severnside.

Q. 10&11 Urban Lifestyles Approach

Do you agree with our Urban Lifestyles approach to investigate further change and growth in our urban areas?

Do you have any comments on Urban Lifestyle approach to investigate further growth and change in our urban areas?

Yes 124 (62%)	No 36 (18%)	Don't know 39 (20%)

Summary of Comments

- Most respondents supported the concept as the starting point for the development potential for South Gloucestershire – however, a number of parish and town councils did not support significant increases in density within specific urban areas and market towns.
- This support was subject to addressing key issues including respecting local character, affordable housing needs, amenity of existing and future residents, provision of public and private green space, and parking.
- Internal design issues that were considered important included good space standards, spaces for working from home, and natural light
- Investment in local supporting infrastructure to serve additional residents was considered very important (public transport, schools, community and health facilities).
- The development industry supported the approach in principle and considered that any issues could be addressed through good design.
- There was caution from the development industry as to the viability of this type of development and the availability of land within existing urban areas and market towns, both of which would limit the amount of homes and jobs that could be delivered -allocated sites must be deliverable or developable with supporting evidence of demand for this type of development, site availability and suitability, and urban capacity.

Q. 12&13 Urban Lifestyle locations

Do you agree with the urban locations where we are investigating the Urban Lifestyles approach?

Do you have any comments on individual locations we have set out, or other locations which should be investigated for an urban lifestyles approach for further growth and change in our urban areas?

Yes 94 (51%)	No 41 (22%)	Don't know 48 (26%)

Summary of Comments

North Fringe

- Strong support for increasing density on Filton Airfield based on the ability to significantly improve transport infrastructure.
- Support for higher density residential uses around the Mall at Cribbs Causeway.
- Support for maximising accessibility through, to and from Parkway to UWE subject to principles already agreed in East of Harry Stoke permissions and for intensification of UWE site to align with the University's aspirations.
- Some concerns about the impact on residents, local services and facilities and local character of raising density in existing centres.
- Concerns about the need to invest in additional infrastructure especially transport and accessibility on foot and cycle.

East Fringe

- Broad support for intensification around town centres but some respondents did not agree with this approach or considered that there would be limited opportunity as this area is already built up.
- It is very important to protect employment land and bring economic value and skill clusters to the area.
- important to protect the local character, historic and green assets of the East Fringe especially at Warmley. Support for regeneration of Kingswood High Street and conservation of Whitfield Tabernacle, a nationally important asset at risk.
- Access to green space within and adjoining the East Fringe communities is limited and needs to be protected.
- Better road, public transport, walking and cycling infrastructure is needed.
- Concern about ability of existing infrastructure and community services and facilities to cope with additional residents.

Yate

- Yate should be considered as a market town rather than part of the urban area and its character and role in providing services for the rural hinterland as well as its links with the Bristol urban area acknowledged and respected.

- There was support for regeneration of the town centre and a better and more attractive connection to the station, but this should be part of an integrated vision and retain facilities and flexibility at the town centre which is required for a range of uses.
- Protecting employment land is important.
- Better transport connectivity and accessibility is needed.

Thornbury

- Some support for reuse of brownfield land in the town centre in principle but any new development in these locations should respect its existing form and character as a market town and be accompanied by infrastructure investment (train and bus).
- Others did not agree with any further development in the town centre due to potential impact on historic character and capacity of local infrastructure which they consider has been overloaded by recent greenfield developments.
- It is important to understand commuter flows out of Thornbury and provide additional transport options.
- The town's employment land supply should not be compromised by urban living approach.
- The issue of high-cost market homes to buy or rent should be addressed.

Q 14,15 & 16 Do you agree with the proposed rural approach?

Do you agree with our proposed approach to the national policy issues highlighted, like flood risk, the Cotswolds Area of Outstanding Natural Beauty, Green Belt, and other planning considerations and issues?

Do you have any comments on our proposed approach to investigate an appropriate level of growth in our rural villages and settlements? Are there any other planning issues that you think we should consider?

Yes 109 (55%)	No 67 (34%)	Don't know 22 (11%)

Summary of Comments

- Some concern regarding the potential for impacts on local character and the environment, which should be taken account of when considering any potential for growth in rural villages and settlements.
- Some consensus that any growth proposed in our rural communities should not just be new housing, and must enhance local vitality through supporting/ building local services and creating sustainable communities.
- Some agreement that rural growth is needed, however, this must be proportional to the village/ settlement and any speculative development (particularly that coming forward recently) should be taken into account in developing any plans for future growth.

- Broad agreement that infrastructure improvements will be necessary in some cases to ensure that rural communities grow sustainably and do not perpetuate/ create a reliance on private car use to access goods and services.
- Broad agreement that the mix of housing will be important, with a desire to see a variety of tenures (including affordable housing) to improve access to housing.
- Broad agreement that different types and sizes of housing will be needed (not just family housing), with consideration for specific groups who want to remain living in rural areas and also make housing more accessible for all.

Q17&18 Scope and range of policies

Do you agree with the range and scope of policies we are proposing to include in our new Local Plan?
Do you have any comments on the range and scope of policies we are proposing?

Yes 106 (55%)	No 37 (19%)	Don't Know 50 (26%)

Summary of Comments

- Several Town and Parish Council respondents commented that further, more detailed information would be appreciated, and that additional policies/strengthening would be required to protect biodiversity, best and most versatile agricultural land and open spaces.
- Some developer and landowner respondents noted the viability constraints around bringing infrastructure elements forward at the same time as development.
- Further proposals for additional policies centred around tourism, adaptable homes, liveable neighbourhoods and development which enables the opening up of additional rail links.

Q. 19&20 Climate Change Mitigation and Adaptation

Do you agree with our proposed policy approach?

Do you think there are any other issues we should consider in this policy?

Yes 91 (51%)	No 38 (21%)	Don't know 49 (28%)

Summary of Comments

- Broad support for the policy from the majority of groups and individuals, and support for addressing the issues through planning policy.
- Desire for clarity around minimising impacts and reduction in greenhouse gases to provide developer certainty as to acceptable and expected standards.
- Welcoming of creative solutions which are inclusive and ambitious.
- Statutory bodies suggested the inclusion of additional wording in accordance with the Energy Hierarchy, plus extra measures on energy efficiency and clean energy generation.
- Some stakeholders proposed additional emphasis on transport solutions, including reducing the need to travel, as well as giving more significance to minimising waste and maximising recycling in construction.
- Clarity requested on what constitutes appropriate and acceptable contributions to climate mitigation to ensure compliance through the development process.

Q. 21&22 Energy Management in New Development

Do you agree with our proposed policy approach?

Do you think there are any other issues we should consider in this policy?

Yes 82 (47%)	No 32 (18%)	Don't know 62 (35%)

Summary of Comments

- Developer respondents proposed insuring that policies were integrated with higher level sub regional and national strategy on energy to ensure certainty and consistency. Practical and policy alignment with Building Regs and Future Homes Standards is essential. Some concerns expressed over deliverability and viability.
- The policies should not restrict the delivery of much needed affordable housing in South Gloucestershire, as affordability remains a key issue.
- Promotion of sustainable transport is more difficult in rural areas which are less connected and more remote.
- Statutory Bodies proposed that the policy could include reference to minimising construction waste, conserving water, avoiding flooding, enabling retrofitting, cycle parking and EV charging.

- Many respondents supported the Council's commitment to be carbon neutral by 2030 and recognised the need to futureproof homes particularly with the Future Homes Standard due to be adopted by 2025. Some concerns were expressed over the speed of change required and the viability of this, and also how existing buildings will be updated to align with these values.
- The requirement for Building Regulations plus 10% not supported - the government consultation references the need for a staged approach to changing building regs to develop supply chains, skills and practices. The Technical Guidance (p169) indicates the draft policy requires a 50% reduction of C02 emissions using latest Building Regs Standard Assessment Procedure (SAP) – this must be clarified.
- There were a mix of opinions on the different types of renewable energy generation but widespread support for its introduction on new developments. Some concerns were expressed over the validity of off-site carbon offsetting schemes.
- The options set out were felt to require further investigation and evidence gathering to ensure their effectiveness and viability.
- Some respondents expressed that the inclusion of Passivhaus requirements is unnecessary given the additional steps of the national Future Homes Standard to the planning process.

Q. 23&24 Renewable and Low Carbon Energy Systems

Do you agree with our proposed policy approach?

Do you think there are any other issues we should consider in this policy?

Yes 86 (51%)	No 25 (15%)	Don't know 59 (35%)

Summary of Comments

- Respondents from the development industry questioned the criteria which would be used to 'safeguard' sites and requested clarity to test whether this is compatible with other agricultural / rural economy uses.
- It was suggested that priority should be given to restore grassland, woodland, heath and scrub as carbon absorbers where they have previously been degraded by development.
- Respondents noted that priority should be given to housing provision in convenient locations for commuter travel. Residential areas must be within walking or cycling distance of employment areas otherwise there will be increased car use.

- The enhancement of existing development to increase its energy efficiency was noted by many individuals. Several people also proposed that renewables would provide better employment and economic benefits than nuclear, especially in rural areas where renewables can provide self-sufficiency.
- Statutory Bodies supported the principle of a Renewable Energy Resource Assessment Study (RERAS) and noted there is a need to regard areas identified as suitable in principle for ground-mounted solar development and wind energy development. The scope of the policy could also consider a requirement for remedial works where a site ceases to be operational.

Q. 25&26 Creating well-designed places

Do you agree with our proposed policy approach?

Do you think there are any other issues we should consider in this policy?

Yes 100 (58%)	No 29 (17%)	Don't know 44 (25%)

Summary of Comments

- People would like more open space which is well-located, safe and attractive, and support for less over-crowded development sites.
- Further evidence/guidance is needed on what forms an 'exceptional' place, with specific examples to be used as benchmarks. The term 'compact development' may also need to be explained further. The term 'beautiful homes' was queried, as was the process of deciding what good design means.
- Some respondents noted that the policy is comprehensive and supported, but would need to be updated to take into account the latest guidance set out in the NPPF and the National Model Design Code, perhaps contained in a design code. Others suggested it was too long, complex and overly prescriptive in some ways, for example relating to nature and public spaces.
- There is some repetition of guidance already set out at national level. Reference to established industry-standard guidance such as Building for Life 12 would be supported, along with requirements for energy efficiency. Clearer and concise policy wording is needed for decision-makers and applicants.
- Queries over the concepts of context, character and identity, with some respondents raising issues with how some modern developments do not respond well to an area's character. Possible issues around the 'new distinctive character' approach, and concerns that this will allow those involved in the process to disregard the concerns of residents.
- Need to consider the long-term impact of people working from home, in terms of key design characteristics. Other future issues would be renewable energy sources, EV charging, and adaptable homes needed as the population ages.

- Disabled access to high-quality public spaces is essential. All places should be accessible for all users. Flexible and durable high quality streets and public spaces should be promoted, employing high quality durable materials, street furniture and signage
- Community participation in the design process is integral to achieving good design.
- Some suggested that new developments should maximise use of land to reduce the need to build elsewhere, while others noted less density is needed and better design is fundamental in new or redeveloped areas, including responding to the character of the area, or simply placing a front door near to parking.
- Reduced parking is needed as congestion will still be an issue once most cars are electric. Undercroft parking could be considered.

Q. 27&28 Parking Requirements, including Electric Vehicles

Do you agree with our proposed policy approach?

Do you think there are any other issues we should consider in this policy?

Yes 59 (35%)	No 47 (28%)	Maybe 65 (38%)

Summary of Comments

- Strong support for applying different standards in different areas in sustainable locations, where facilities are within walking or cycling distance.
- Support for a reduced number of cars on the road, and for good public transport, as there is already too much traffic and pollution. Recent developments in SG have shown that public transport is not good enough and that car travel is much easier for most people.
- Support for a more flexible approach to parking from developers where a site's specific context may necessitate a lesser or greater provision than normal. There are also situations where minimum parking standards can undermine regeneration proposals and delivery of higher density development and amenity space.
- Support for the future repurposing of existing parking spaces towards sustainable travel, the restriction of car parking to incentivise use of public transport and walking/cycling, the introduce workplace parking levies, and the stopping or reduction of free parking.
- Introduction of the parking assessment/appraisal is supported but this needs to be agreed at pre-application stage and supported by evidence. At this stage, there is insufficient evidence to comment on what the reductions in parking levels in the most sustainable locations might be.
- Some thought there should be no reduction to current parking standards and an increase in parking spaces for larger family homes, including for extensions to homes. Car drivers should not be penalised and consideration should be given to safe vehicle parking.

- Others felt that there is inadequate parking provision and people have not generally abandoned their cars in favour of bicycles or public transport. Reduced parking provision could lead to problems with pavement parking and blockages of refuse collections and deliveries. Private car use and ownership will reduce if there is a well-funded, regular, and affordable public transport system in place.
- A rise in households with young adults could mean greater demand for parking, particularly in rural areas, which already do not have adequate provision in some cases.
- There should be a requirement for one EV charging point for each new building and for extensions, with the requirement for EV charging (at 20%) being too low, but reasonable to provide infrastructure to enable widespread electric charging.
- While EVs will reduce C02 they do not justify a move away from a spatial strategy which maximises opportunities for walking, cycling and public transport, and support for fast-charging where possible based on grid capacity and supply of energy.
- Costs and financial viability must be considered for installing new EV charging for homes and the upgrading of the power grid. Viability should be considered at the plan-making stage. How this policy sits with requirements set out in Building Regulations needs to be carefully considered, as does the need/demand. Building Regs may cover EV charging requirements making a LP policy unnecessary.
- Clusters of fast-chargers instead of chargers for every home could be considered, or kerb-side chargers within existing urban environments, or fast-charging points in all Council-owned car parks.
- Progress of technology is moving fast so provision of infrastructure is most important aspect.
- Possible impacts on disabled parking provision by a reduced parking level in the most sustainable locations. Underground parking should be considered, and parking spaces should be large enough for modern cars.
- Query on inclusion of garage parking within parking provision, as garages are too small and are not used for car parking. The use of smaller cars should be encouraged. The introduction of car clubs could reduce demand for second cars, while motor bikes could help with efficient, low pollution commuting which reduces congestion.
- Cycle parking provision outside shops should be made for cargo bikes which can transport more goods, but which require more space.

Q. 29&30 Nationally Significant Infrastructure Projects (NSIPs) and Related Development

Do you agree with our proposed policy approach?

Do you think there are any other issues we should consider in this policy?

Yes 42 (27%)	No 15 (10%)	Maybe 97 (63%)
Summary of Comments		

- Some questions raised as to the timing of the consultation, in relation to NSIPs, due to the West of England Spatial Development Strategy's emerging state, and the need for effective cross boundary working across the West of England.
- Suggestion of additions to the policy to provide for biodiversity provision and opportunities for habitat within NSIPs.
- Major infrastructure development in the Cotswolds AONB should be landscape led and contribute to conserving and enhancing the natural beauty of the AONB. This should include fully respecting and integrating the special qualities of the AONB into the planning, design, implementation, and management of the development.
- NSIPs provide opportunities for local employment, training and skills development and links with priority neighbourhoods should be made
- Support for a collaborative partnership approach on NSIPs, including with neighbouring authorities, alongside full consideration of the strategic environmental, transport and socio-economic impacts of any proposed NSIP, to ensure that strategic level impacts and mitigation measures are adequately planned for.

Q. 31&32 Nuclear New Build

Do you agree with our proposed policy approach?

Do you think there are any other issues we should consider in this policy?

Yes 43 (27%)	No 28 (18%)	Maybe 86 (55%)

Summary of Comments

- Questions raised over the lead time for the delivery of new nuclear sites and whether this could take place in the lifetime of this Local Plan.
- Respondents suggested of reuse of existing disused nuclear sites rather than development at fresh locations.
- Opportunities for job creation recognised but noted that housing and transport infrastructure will need to keep pace with any proposed nuclear new build.
- Some concerns expressed over the principle of nuclear, with wind and solar proposed as safer and cleaner alternatives. Other suggestions of smaller nuclear installations with fewer impacts on the wider area were made.

- Local Plans should have policies on decommissioning and radioactive waste management. Their absence leaves local authorities and communities less able to influence proposals for the disposal, storage, management or transportation of radioactive materials within their area.
- There was a suggestion that the policy should refer to the Nuclear Decommissioning Authority and positive collaboration with this Authority.
  Stakeholders felt that if new nuclear build does not take place, there is opportunity for greater biodiversity enhancement on the Severn.
- Statutory Consultees support for the policy approach and would welcome the opportunity to work closely on the development of this policy area. The provision of housing for construction workers, health and safety issues are flagged as cross boundary issues, as well as the nuclear waste risk area, transport and biodiversity impacts.
- Emergency planning is a concern. The DEPZ inner zone (Detailed Emergency Planning zone) and outer zone needs to be defined and illustrated in the Local Plan strategy. Further explanation of safe evacuation procedure is needed.

Q. 33&34 Oldbury A Station- Decommissioning

Do you agree with our proposed policy approach?

Do you think there are any other issues we should consider in this policy?

Yes 59 (38%)	No 14 (9%)	Maybe 83 (53%)

Summary of Comments

- Concerns over the risks involved in transporting the materials were expressed by stakeholders, and proposals made that extended rail facilities could be made available to avoid compromising road infrastructure
- Support for this policy from the nuclear advisory forum
- Support for recognition of the ecological and landscape sensitivity of the location. Support for the reinstatement of the habitat value of lagoon 3 for bird species with the Severn Estuary SSSI, SPA and Ramsar site. Natural England is supportive of this approach in principle and would welcome further discussion with the Council.
- Neighbouring local authorities are supportive of the policy and themes and welcome opportunities for cross boundary cooperative working.
- Some stakeholders commented that the former nuclear site should be returned to environmental or agricultural use to enhance biodiversity, and that flood risk and coastal erosion must be prioritised and dealt with in relation to this site

Q. 35&36 Radioactive Waste

Do you agree with our proposed policy approach?

Do you think there are any other issues we should consider in this policy?

Do you have any other comments to raise not relating to the above questions

Yes 49 (32%)	No 17 (11%)	Maybe 85 (56%)

Summary of Comments

- Key comments on this policy were around the safe transport of nuclear waste, its appropriate storage, and opportunities for biodiversity and habitat creation on former nuclear sites.
- Stakeholders proposed reference to the following documents to guide the development of this policy further:
    - -The development by the UK Government (BEIS) of a new Decommissioning and Legacy Waste Management Policy
    - -The NDA's guiding Strategy 2021-26 (Strategy 4)
    - -The anticipated publication by the UK Government of Guidance for On-Site Disposal of Radioactive Waste from Nuclear Sites
- Statutory bodies are supportive of the policy approach and the encouragement of community benefits/funding.

Q2. Urban Lifestyle areas and density ranges

We are proposing a new policy approach to development within the most sustainable parts of our urban areas and market towns to make the most effective use of land.

Do you agree with this new policy approach in these areas, including the proposed density ranges for each area?

Yes 65(42%)	No 50 (32%)	Maybe 39 (25%)

Summary of Comments

- Broad support for the approach to making the most effective use of land and reducing the need for greenfield developments by optimising density of new residential and mixed-use development in the most accessible places within the urban areas and market towns.
- The majority agreed that we would not be able to meet our full housing need from this source. However, CPRE considered that although total housing need not yet known from the SDS, all SGC housing need will be deliverable from this source without need for new settlements.
- Concerns raised on quality of new development and impact on existing residents and the environment. Decent public realm, minimum private amenity space, access to green spaces, accessible walking routes, effective public transport and a range of facilities must be provided to ensure that this type of development is acceptable.
- Members of the public and others said that previous developments had put a strain on existing infrastructure particularly health and community. Increased density only acceptable if facilities already in place or provided by the development.
- Support and some concern about flexible parking standards.
- The development sector challenged the capacity and viability of brownfield sites. Allocations with evidence of capacity and deliverability are required to support this approach. Considered that around 2,000 homes would be deliverable from this source.
- Strong support for the need to protect and safeguard existing employment sites.
- Need further evidence of the need for smaller homes and apartments.
- Retention and reuse of existing buildings rather than demolition should be encouraged to reduce carbon emissions.
- Reliable public transport should be in place before any development is occupied or increasing density will result in more cars congestion reduction of air quality and failure to decarbonise the economy.

- Heritage England - Optimising density in historic places can often complement existing compact forms. The proposed policy approach recognises that the character, appearance and setting of heritage assets is important to safeguard and inform the density and form of future development as required by national policy and legislation.
- Highways Agency – broadly supportive but further evidence on the range of facilities and transport accessibility criteria which led to the choice of areas and density range. Criteria should take account of committed transport schemes and scope to improve connections. This policy has potential for trip generation in areas already experiencing adverse transport related impacts Transport evidence is required to assess these impacts on the SRN.
- Gloucestershire CC – strongly endorses intensification in accessible town centres. Concern about lack of strategy for access and mobility for aging population.

Density study
- Support for evidence and analysis in the density study.
- Concern: not accompanied by Landscape and Visual Impact Assessment, ranges should not be capped, will result in a high proportion of flats which are not needed in South Gloucestershire.

North Fringe
- Filton Town Centre – support location and density range. Public realm and permeability needs to be improved.
- Filton Airfield – owners very supportive of approach but higher densities could be achieved justified by planned, significant public transport improvements. Other developers thought range too high.
- Bradley Stoke – density range too high and limited opportunities.
- Patchway Town Centre – support but limited opportunities.
- The Mall and Cribbs Causeway – Owners support recognition of potential to intensify and include wider range of uses to optimise use of land but density range may be too low. Need for retail evidence and policy in the plan. Other developers thought the density range too high.
- Stoke Gifford, Parkway Station to Abbey Wood – support but limited opportunities.
- UWE - support principle but would like to recognise potential for greater transformation with potential for higher densities (120-160 dph)
- Emersons Green Town Centre – support but limited potential and sites

East Fringe
- Longwell Green should keep its role as shopping centre with car parks (public). Density range too high.
- Staple Hill Town Centre – support for density range and principle. Both support (from site promoters) and objections to change of use of employment sites to residential.

- Kingswood – agree with optimising density within a 10 minute walk of the shopping centre. Support for masterplan approach but any loss of employment land should be replaced elsewhere.
- Hanham – support but greenfield site promotor suggested extending area suitable for higher densities based on local centre at Pear Tree Road to support urban extension.

Yate
- Support for increasing density in the proposed locations if quality is right and reduces need for greenfield development nearby (public).
- The impact of this policy must considered in combination with any greenfield allocations around Yate. Urban lifestyles approach is supported but not in Yate where it is not compatible with existing character. However, may consider appropriately designed development in town centre if this would protect town from further greenfield development. Proposed density around Yate Station and Station Road is too high. Whirlpool site should remain safeguarded but could be redeveloped for higher density and more varied employment uses. (YTC)
- Loss of employment land is not acceptable without compensatory land within walking distance or policy will increase commuting (YTC) Object to loss of employment land next to the station (development industry).
- Some confusion about the overlapping areas on the map (YTC and Dodington PC).
- Support but dwelling yield should be realistic as existing uses would need to be retained.
- Support but with higher densities (site promoter).

Thornbury
- Thornbury Neighbourhood Plan should guide the planning authority in its consideration of development. Due to the listed building and conservation area high quality design is essential to respect existing character.
- Need to recognise role as a service centre for residents of rural areas and villages and new development too far to walk on edge of the town so continued need for town centre parking (public)
- Concern about impact of historic character of the town from members of the public.
- Support but limited opportunities for change (developers)

Chipping Sodbury
- Support the general approach but some concern about the impact on the existing character of the town and its conservation area at the upper end of the proposed density range. (Chipping Sodbury Town Council)

Q3. Urban Locations and Sites

Do you agree with the potential Urban Site Allocation(s)?

Summary of Comments

- Safeguarded employment sites located near urban housing allocations have potential for excessive noise issues.
- Site capacity figures need to be made public to establish housing supply requirement.
- Do not agree with SGC allocations and question viability of brownfield sites and demand for high density urban living.
- Housing needs of rural areas neglected in favour of urban.
- A number of brownfield sites are likely to have abnormal redevelopment costs, which may impact on their contribution to housing supply numbers.
- Object to 'Urban Lifestyles' approach grouping urban fringe areas and market towns together as there are distinct differences between them.
- Object to Chipping Sodbury being included in 'Urban Lifestyle Areas'
- Questions regarding site selection methodology of non-brownfield sites in Hambrook. Two sites in Hambrook included in Urban Lifestyles and also identified as a village suitable for expansion.
- Conclusions for why sites have been rejected, not been provided.
- Specific sites should not be relied upon to deliver housing over the plan period.
- Areas have been allocated for growth through Urban Lifestyles approach are yet to identify any site allocations therefore cannot meet SGCs future housing targets (Cribbs)
- Sites no longer suitable for employment should become sustainable urban allocations.
- More sites needed for development to achieve targets.
- Density ranges in urban areas to high.
- Concern over reduction in house numbers for Cribbs New Neighbourhood.
- Bradley Stoke is a missed opportunity for redesign, improve infrastructure and density.
- Green Belt and greenfield needed for wellbeing of community.
- We need a much better transport system. Especially for people who are unable to use public transport ie. bicycle or walk
- Urban Lifestyles policies should treat market towns of Yate and Thornbury differently to those of the North and East Bristol Fringe communities, because of their role in serving the surrounding rural communities
- Housing should be on brownfield sites only and situated where there is employment .
- Standard advice over potential flood risks.
- No specific advice to sites, from Highways Agency but strategy should be supported by an appropriate transport evidence base

Q4. Safeguarded Employment areas

Do you agree with continued Safeguarding of the Employment Area(s) shown?

Summary of Comments

- Supportive of continued safeguarding of employment areas, however SGC should consider potential for new mixed use developments that could come forward on greenfield sites.
- Some were unsupportive of safeguarding strategy feeling the LP does not include infrastructure requirements and has not reconsidered Post Covid environment, where working localities have changed. We should reshape rundown shopping areas into mixed use developments.
- Support protection of important employment sites, however sites no longer fit for the purpose should be redeveloped
- No detailed policies that relate to safeguarded employment areas, it is recognised that some sites may need to allow for alternative uses in the future.
- Supports safeguarding employment land as loss of this land means find replacement land in greenfield and competing against residential housing need
- More employment is required where people live as much has been lost over the last few decades.
- Suggest a waste policy perspective of establishing circular economy opportunity where waste producing business is in close proximity to waste site.

Q5. Community Led growth

Do you have any comments on the pathway 1 approaches that are open to all rural communities? These include the Rural Exception Sites policy and new general rural housing sites policy and Neighbourhood Plans.

Summary of Comments

- Some confusion over the terminology and difference between Rural Exception Site Policy and Community Led Rural Housing Policy
- Support for Community Land Trusts and the increased influence of Neighbourhood Plans in the process. Cited Marshfield as an example of CLT process working.
- Community groups commented that none of the NDPs in South Glos have successfully allocated growth.

- Some respondents were concerned about the loss of Green Belt but also felt that affordable housing provision is essential for vibrant places.
- Lack of rural public transport was felt to make rural places unsustainable. Pathways must fit with the climate emergency agenda.
- Clearer definitions of "local", "appropriate" and "well related" needed for policy to be effective.
- Housing Needs Surveys should be kept up to date and Village Design Statements referenced in the process.
- The Environment Agency expressed support for avoiding the flood plain, sustainable design and avoiding harm to the environment which should include the water environment.

Q6. Do you agree with the list of villages

Do you agree with the list of villages and settlements we propose to investigate for local plan led growth and allocations, shown in Table 1 and on the map?

Yes 67 (40%)	No 66 (39%)	Maybe 35 (21%)

Summary of Comments

- Comments by members of the public tended to centre on transport, capacity and sustainability issues in respect of growth in villages.
- Many people cited a desire to retain green space and the Green Belt and noted the lack of facilities in rural areas.
- Some stakeholders suggested that only small levels of growth could be accommodated in villages.
- Statutory consultees proposed additional attention is paid to Strategic Green Infrastructure Corridors to preserve and enhance these within development.

Q7. Initial Groups for rural growth

Do you agree with the initial groupings and indicative growth ranges shown in Table 2, which might be applied to those villages and settlements being investigated for local plan led growth?

Yes 27 (17%)	No 88 (55%)	Maybe 46 (29%)

Summary of Comments

- Locations closest to the built-up parts of South Gloucestershire were the subject of the majority of the responses to these questions.
- Some members of the public felt further growth in these locations was inappropriate.
- Developer/landowner comments focussed on the opportunities of well-located places, accessible to urban areas and promoted their development.

Q8. Other policies for rural areas

Do you have any comments on the approaches taken through these existing policies, or suggestions for other rural topics we should cover through new or updated planning policies?

Summary of Comments

- Some individuals suggested a need for a more transparent process and information on how calculations/methodology were established, and a check on accurate evidence using parish and town council information
- Several members of the public commented on the need for homes appropriate for people at all stages of life, especially older people who may wish to downsize.
- An additional specific policy is needed to deal with the conversion of redundant agricultural, forestry and other rural buildings in the countryside.
- Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver. Recognise that development has an irreversible adverse impact on the finite national and local stock of BMV land.
- The conservation and sustainable management of soils is reflected in the National Planning Policy Framework (NPPF), particularly in paragraph 174. When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration.

Q9. Renewable Energy

Do you have any comments about the general principles for developing a positive strategy for renewable energy generation in South Gloucestershire?

Summary of Comments

- Green Belt, commercial and industrial buildings, and the Severn Estuary highlighted as locations for renewables. More use of residential properties for solar PV and encouragement of heat pumps in new properties was supported.
- Concerns over protected landscapes/biodiversity and impact of renewable installations were expressed. The policy should require the removal of facilities and reinstatement of renewable energy sites should they cease to be operational
- A mix of opinions over new nuclear provision were noted.
- Statutory bodies noted that renewables can have wide ranging impacts eg on birds and bats even outside designated sites and this needs to be considered to avoid damage to biodiversity
- Statutory bodies were concerned about the impact on the AONB. A number of the sites for big wind are within or affecting the setting of AONB. Landscape sensitivity needs to be central to the debate on identification of sites.
- Community groups who responded showed strong support for green energy generation and felt that community involvement in renewable energy development is essential. Local learning available in Bristol.

Q10. Solar Energy

Do you agree with our proposed approach to planning for solar PV development or have any suggestions for other issues we should consider?

Yes 57 (41%)	No 47 (34%)	Maybe 34 (25%)

Summary of Comments

- Further detail required especially in more sensitive areas such as Strategic GI Corridors, AONB and Conservation Areas. Some concerns over the "broad brush" approach which covers gardens, commons and playing fields
- Some individuals commented that heat pumps may be less invasive and visually intrusive but suggested buildings, car parks and bus stops as potential places for PV
- Historic England notes that Scheduled Ancient Monuments, Listed Buildings and historic parks and gardens must also be protected as well as Conservation Areas
- Stakeholders suggested that the methodology for site selection could be clarified so that it is not open to challenge.

Q11. Wind Energy

Do you agree with our proposed approach and areas suggested for safeguarding 'Big Wind'?

Summary of Comments

- Parish Councils of Oldbury on Severn, Rockhampton and Hill, Tormarton and West Littleton object to potential big wind allocations.
- While concerned over visual and wildlife impacts many people were positive about the possibilities for wind due to the climate emergency.
- Support for smaller wind installations which may be less impactful on surroundings.
- Developers expressed broad support for renewable energy.
- Suggestion of wind turbines next to motorways to reduce impact elsewhere.
- Statutory bodies noted that the impacts should be evaluated via Landscape Sensitivity Assessment.

Q12. Community Energy Proposals

Do you know of or represent a local community group with an interest in energy generation? If so, what measures would you like to see put in place to support you to bring forward proposals?

Do you have any comments on our proposed approach to community energy proposals?

Summary of Comments

- Broad support for community energy initiatives from consultees, and suggestion that smaller sites for renewables can make a significant contribution
- AONB representative organisations noted support for community led renewables which are compatible with the purposes of AONB designation
- A wish expressed for the local authority to provide more advice and support so that communities understand the process and their options
- Local community energy groups made the following comments:
- Bristol Energy Cooperative is exploring community owned renewables in South Glos in collaboration with Climate Action Yate and Sodbury and Climate Action Thornbury.

- Need planning support to reduce risk to communities of the cost of refusal of permission. Currently too expensive/risky with many schemes being turned down.
- Marshfield CLT has secured a government grant for renewables feasibility study for the parish. Needs more partnership and collaboration to work as successfully as possible.
- Need expertise and encouragement from SGC planning for this to be able to get off the ground.

Q13. Strategic GI Network

Do you agree that the Strategic Green Infrastructure Network, which consists of the nine corridors shown on the map, should be designated in our new Local Plan?

Summary of Comments

Overall support for the designation of the nine corridors with comments on individual corridors:

A: Shepperdine-Oldbury on Severn-Severn Beach *(Severn Estuary and Levels)*
- No comments received

B: Charfield-Alveston-Hallen (Western Scarp and Severn Ridges)
- Support from site promoter providing development is not overly constrained.
- Support from TRAPP'D community group but query that Cleeve Park site could undermine the robustness of the policy.

C: Winterbourne-Kendleshire-Yate *(River Frome Corridor)*
- Why is GI of Engine Common, and Coalpit Heath area adjacent to Frome, Ram Hill Colliery and Frampton End (with potential links to Roden Acre Wood and Chill wood SNCIs) not included?
- Support from site promoter but query extent of the corridor at Swan Lane.
- Site promoter considered site west of M32 and south of Filton Rd does not fulfil primary function of corridor or contain key elements but also that development of the site could deliver benefits.

D: Wickwar-Westerleigh-Bitton (Westerleigh Vale, Oldland Ridge and East Fringe)
- Why is Lyde Green excluded from corridor, and why flat land between Rock House farm and Shortwood is identified as visually important hillside.

E: Hawkesbury-Old Sodbury-Upton Cheyney (Cotswold Scarp)

- Additional land around Sodbury, Yate and Dodington need to be included due to importance of Local nature action plans**.**

F: Hanham Green-Hanham Abbotts-Bitten *(Avon Valley)*

- Why is St. Catherine's Valley not included?

G: Wickwar-Iron Acton (Ladden Valley)

- Parish Council concerned about Centenary Field biodiversity and function as new nature reserve. Wish to see Frampton End-east or river included.
- Promoter of land in corridor G questioned the inclusion of land lying further away from brook.

H: Hinton-Doynton-Bitton *(Boyd Valley)*

- No comments received

I: Huntingford-Charfield-Wickwar (Little Avon River Corridor)

- Land promotor considered corridor I to be of more local importance and concerned it takes in land away from the river that is currently being consulted on.

Q14. Strategic Green Infrastructure and Environment

Do you agree with our proposed policy approach?

Yes 67 (48%)	No 41 (29%)	Maybe 32 (23%)

Summary of Comments

- Support for designation of a strategic GI corridor network to increase resilience to climate change, protect features and create a network of habitats, heritage features, routes and areas for recreation.
- Confusion regarding role of GI as opposed to Green Belt.
- Support from the development sector was conditional on flexibility in the application of the policy and clarification that some development within the corridors will be appropriate.

- Detailed comments from the development sector on elements of the policy and evidence requirements. Site specific queries on boundaries and comments on the methodology and its application.
- Support for commitment to joint working to achieve integrated cross border GI network.
- Support for the 9 corridors, evidence and assessment process and consistent with West of England Joint GI Strategy but concern about recreational pressures on designated sites. (Natural England).
- Further clarification was requested in terms of visually important hillsides. More evidence is required and better definition of what these terms mean.
- Some in the development sector considered the policy too onerous. Objections to including specific areas of land and/or exact boundaries from developers and landowners.

Q15. Houses in Multiple Occupation (HMOs)

Do you agree with our proposed policy approach?

Yes	No	Maybe	A further 12 (10%) did not indicate
37(31%)	8 (7%)	62 (52%)	

Summary of Comments

- Overall support for the draft policy with many respondents identifying their experienced and perceived issues with HMO development and the potential for the policy to help address these issues, including poor waste management, anti-social behaviour, poor quality accommodation and impacts on community.
- Comments relating to specific aspects of the policy such as minimum parking requirements, EPC rating, recycling provision and space standards.
- Clarification requested as to how the policy would be applied in relation to intensification of existing HMOs.
- A relatively small number of objections to the draft policy, including a specified reason that it may make planning permission too hard to obtain.
- Comments relating more broadly to the regulation of HMOs, including how they are registered.

Q16. Urban Lifestyles and Density

Do you agree with the proposed policy approach of optimising density within the areas named in table 1 and the range of policy criteria that should be applied when considered appropriate density of development?

Yes 42 (36%)	No 38 (32%)	Maybe 37 (32%)

Summary of Comments

- General agreement with overall approach, including making efficient use of land, optimising density, the provision of minimum room size standards, setting of density ranges in sustainable locations, good/attractive designs, access to safe open spaces, green streets and public realm and the protection of local amenity, and valuable heritage assets.
- Support for optimising density as a way of reducing reliance on greenfield sites.
- Strong support for this approach within existing urban areas within the north and east fringes, with particular support for even higher densities within the UWE Frenchay Campus, the former Filton Airfield site, and within the Cribbs/Mall area.
- The Density and Character Study (Jan 2022) was generally supported as a supporting evidence for the new policy approach.
- There was support for flats needing to have balconies to help dry clothes and for access to fresh air.
- Various comments regarding densities being too high in some areas, possibly at the expense of quality of life. In particular, parts of the East Fringe and the market towns.
- Specific issues raised included viability, cost of redeveloping brownfield sites, impact on affordable housing, housing delivery, timescales, need to be cautious on numbers from UL and that this type of development tends to deliver 1 and 2 bed flats rather than family housing. Aso raised that the policy is premature due to lack of landscape, visual impact and transport assessments.
- For parking, there were a few responses not supporting reductions, and some felt it was not realistic in some areas to have no parking, but others supporting an area-specific approach. More generally, car ports should be provided under buildings rather than garages to encourage use for parking rather than storage.
- Providing balconies not always feasible in dense urban locations due to impacts on amenity and heritage.
- Consider use of a minimum density figure alongside the density ranges and some of the density ranges are too high.
- There was a mixed reaction to the suggested introduction of the Nationally Described Space Standards (NDSS) applied to all types of residential accommodation (open market and affordable). Various issues raised, including viability.
- Need to limit cost and extent of new information required by this new policy approach, given that there is already a high level of red tape.
- Reliable public transport is essential to support the Urban Lifestyles approach. Need clearer and more visual examples of what different densities look like, linked to concern that proposed densities are too far above the prevailing densities in each area.
- Various clarifications were requested, including if the character appraisal is an additional requirement further to the design and access statement, if densities should be reduced further from the centre of each area, and if a design review panel (DRP) would be

only required for developments of 25+ homes. There was some opposition to the use of DRPs, based on issues relating to possible capacity at the DRP provider, and associated costs.
- References to cross-sections and wind information could be included within the planning application checklist, and some issues around use of imprecise wording, such as 'provision of adequate parking', 'appropriate walking distance', and 'taller buildings'. The mapping should also be made clearer.
- Several suggestions around the inclusion of a stronger emphasis on landscape/ecology issues. Issues raised included using ecological appraisals supported by groups with local knowledge, the inclusion of 'green/blue' term, and a stronger emphasis on minimising the use of greenfield sites.
- Policy should not allow integrated garages to be filled in for living space and same applied to recessed balconies.

Q17. Biodiversity Net Gain

Do you agree with our proposed policy approach?

Yes 68 (54%)	No 23 (18%)	Maybe 36 (28%)

Summary of Comments

- Concerns were raised over the practicalities of monitoring and enforcement to ensure that obligations are met, and whether net gain targets are reasonable for small developments.
- Some stakeholders proposed using a map within the plan to clearly demonstrate relationship between development sites and opportunities for net gain.
- Statutory bodies commented that avoiding adverse impacts should be the first priority and that biodiversity net gains should be delivered to even if there are no losses through development. Further they proposed that different thresholds for different development types may be appropriate and stated that on site provision of biodiversity net gain would be preferable.
- Several members of the community proposed reference to the use of Local Nature Action Plans and were concerned about how development and growth could be compatible with improving biodiversity.

Q18. Rural Exception Sites and Community Led Rural Housing

Do you agree with our proposed policy approach?

Yes 50 (39%)	No 32 (25%)	Maybe 45 (35%)

Summary of Comments

- Many local Councillors and Town & Parish council clerks commented if a Parish Council has identified land where affordable housing can be built this should be regarded as a contribution to the total number of houses. Overall agreement that placement and scale of development must fit with character and size of the area. There must also be support from local council.
- Rural Exception Sites should not be considered extra growth to areas considered in Local Plan – additional concern that many local councils won't realise that CLH scheme will be on top of existing development that may come forward in Local Plan.
- Strong agreement that affordable homes should be key for development in rural areas
- Agreement that each place must be treated as an individual case; scheme isn't a 'one size fits all' solution.
- Concerns over if parish council isn't a balanced representation of the community views, clause in policy means it would be dependent on personal counsellor's views.
- A concern over various groups about the timescale and resource heavy nature of Neighbourhood Plans and many places won't realise this going in.
- Strong agreement across members of the public that CLH must be truly led by community opinion. Additionally, to this, a concern that only local landowners will benefit from this scheme.
- Some members of the public have concern over schemes meaning development in the Green Belt which changes village boundaries and character of area.
- Some members of the public agree an assessment of areas washed over by Green Belt should be considered first.
- Important to pursue plan led approach because many communities are resistant to growth.
- ESs are not a reliable source of housing supply and should be used as a top up.
- Some disagree with policy that allows non affordable units to be developed, other than to support affordable homes.
- Some concerns that Neighbourhood plans are not effective at releasing Green Belt land.
- Developers concern that the policy may be too restrictive/ rigid.

Q19. Management and maintenance of public open space

Do you agree with the principle that newly created public open space should in the first instance be designed and planned to be adopted by the Council and appropriate Town and Parish councils, with a supporting level of financial contribution to cover future management and maintenance?

Yes 70 (56%)	No 23 (18%)	Maybe 33 (26%)

Summary of Comments

- Many respondents were unclear on the process of securing public open space and the allocation of S106 funding/maintenance contributions and comments centred on questions around clarity on this, particularly in respect of members of the public and town/parish councils. There was also some misunderstanding expressed around the need for maintenance of open spaces, even those designated as "wild".
- Respondents wished to see a variety of green/open spaces for different purposes, and for this to be set out ahead of development taking place. Some concerns were expressed over the cost of independent management of public open spaces.
- Several developer/landowner respondents suggested maintenance and management agreements should be set up on a site-by-site basis, offering a flexible policy approach to ensure a high quality of service. Concerns were expressed over the costs and possible delays that negotiating agreements might cause.
- The need for efficiency in ensuring just one management agreement on a site was pointed out, enabling better service delivery and reducing costs, whichever agency is selected to taken on management of a space.
- Statutory consultees noted that long term management of POS is essential and needs to be adequately resourced. POS is important but is also an important element of the green infrastructure network - where possible, new (and existing) POS should be located, designed and managed to maximise its societal and environmental benefits.
- Adoption of new POS by the Council and appropriate Town and Parish councils appears sensible and should help to ensure a consistent and joined up approach is taken.