SOUTH GLOUCESTERSHIRE LOCAL PLAN

South Gloucestershire Council

Delivering with you

Regulation 18 Phases 3 & 4

Consultation and Engagement Report

FEBRUARY 2025



Contents

Introduction, purpose and context 5
Compliance with the Duty to Co-operate (DtC) 8
Our approach to engagement 11
Phase 3: Towards a Preferred Strategy 11
Phase 4 – Topic Paper for Housing Land Supply and Bristol Unmet Need 15
Phase 3: Regulation 18 Consultation - Towards a Preferred Strategy 17
Key Phase 3 Engagement Activities 17
Phase 4: Regulation 18 Consultation - Topic Paper for Housing Land Supply and Bristol Unmet Need 20
Key Phase 4 Engagement activities 20
Summary of Main Issues Arising from Regulation 18 Consultation Phases 3 &4 21
Introduction 21
Phase 3 Towards a Preferred Strategy – Summary of responses to consultation questions 24
Introduction 24
Q2 Council Priorities and Local Plan Objectives 24
Q3 Planning for Economy and Jobs 27
Q4 Planning for Town Centres 29
Q5 Planning for Infrastructure 30
Q6 Urban Areas and Market Towns 32
Q7 Towards a Preferred Strategy 36
Q8-10 Strategy Lenses: General comments 55
Q8 Strategy Lens: No Green Belt Loss 57
Q9 Strategy Lens: Urban Edge 59

Q10 Strategy Lens: Transport Corridors and Hubs 61
Q11 Planning for Gypsies Travellers and Travelling Showpeople 63
Q12 Planning for Renewable Energy 65
Q13 Minerals 67
Q14 Strategic Green Infrastructure Corridors, Strategic Viewpoints and Visually Important Hillsides 69
Q15 New Local Plan Policy Framework – Approach to Adopted Policies 70
Q16 Climate Change Mitigation, Adaptation, and Resilience - Policy 71
Q17 Economy and Jobs- Policy 72
Q18. Town Centres- Policy 74
Q19 Affordable Homes- Policy 75
Q20 Accommodation for Gypsies and Travellers- Policy 76
Q21 Accommodation for Travelling Showpeople- Policy 77
Q22 Mineral working and restoration- Policy 78
Q23 Energy Management in New Development- Policy 79
Q24 Embodied Carbon- Policy 79
Q25 Renewable and Low Carbon Energy Systems- Policy 80
Q26 Community Energy- Policy 81
Q27 Internal Space and Accessibility Standards- Policy 82
Q28 Strategic & Major Sites Delivery Policy- Policy 83
Q29 Stewardship Policy- Policy 83
Phase 4 Consultation - Summary of responses to consultation questions 84
Q2 Emerging Spatial Strategy - Site Selection Process 84
Q3 South Gloucestershire's Housing Need 85
Q4 Council's Approach to whether it can assist with Bristol City Council's Unmet Housing Need 91
Summary of Changes to the Local Plan as a result of 4 phases of Regulation 18 Consultation 93
Introduction 93
Local Plan Objectives 93

Spatial Strategy – Strategy Principles, Locational Strategy and Delivery of New Homes 95
Making Effective Use of Land 97
Settlement Boundaries 98
Residential Development in the Countryside 98
Major Sites Delivery Policy (previously Strategic & Major Sites Delivery Policy) 99
University of the West of England, Frenchay Campus 100
Land at former Filton Airfield - Brabazon 101
Severnside Employment Area 102
Affordable Homes 102
Accommodation for Gypsies and Travellers 104
Accommodation for Travelling Showpeople 105
Houses in Multiple Occupation (HMO) 105
Age-Friendly (previously CS20 ExtraCare Housing) 106
Rural Exception Sites and Community Led Rural Housing 107
Internal Space and Accessibility Standards 108
Safeguarded Employment Areas 109
Non-Safeguarded Employment Sites 110
Employment and Skills Development 111
Town Centres, Retail and Leisure 112
Major Stadia 113
Sustainable Movement & Transport Infrastructure 113
Parking Requirements, including Electric Vehicles 115
Climate Change Mitigation and Adaptation 116
Energy Management in New Development 117
Embodied carbon 119
Renewable and Low Carbon Energy Systems 120
Community energy 121

Strategic Green infrastructure and Environment 122
Ecology and Biodiversity Net Gain (previously Biodiversity Net Gain) 123
Creating well-designed places 124
Stewardship (previously Stewardship Arrangements) 125
Private & Communal Amenity Space Standards (previously Private Amenity Space Standards) 126
Mineral working and restoration 127
Nationally Significant Infrastructure Projects (NSIPs), New Nuclear Build, Radioactive Waste, Oldbury A Decommissioning 128
Waste Policy 129
Appendix 1 – Duty to Cooperate Position Statement 130
South Gloucestershire Local Plan Duty to Cooperate Update December 2024 ..... **130**
Introduction 130
Progress with complying with the DtC 131
Appendix 2 135
Summary of matters of cross boundary significance and issues of soundness identified following close of Local Plan Reg 18 consultation stage 135

Introduction, purpose and context

There have been 4 phases of stakeholder engagement on the South Gloucestershire Local Plan between 2020 and 2024.

South Gloucestershire Local Plan Regulation 18 – engagement phase	Date of public engagement	Content
Phase 1 - Issues and Approaches	27.11.2020 to 01.03.2021	Discussed the key issues and set out priorities for achieving sustainable development. It also explored alternative 'building blocks' for new development and potential locations, alongside the proposed range and scope of policies for the new Plan and 9 draft policies
Phase 2 - Urban, Rural and Key Issues	7.2.2022 to 04.04. 2022	Provided further detail on the approach that could be taken in urban areas, market towns and rural villages, including places that might be appropriate for new homes and jobs, along with proposed approach to renewable energy and green infrastructure and 5 draft policies. Up until this point, the Local Plan was being developed within the context of a sub-regional Spatial Development Strategy covering the West of England area.
Phase 3 – Towards a Preferred Strategy	6.12.23 to 16.2.24	Explained that the West of England authorities were no longer developing a Spatial Development Strategy. As a result, SGC was now responsible for determining the scale of housing, employment and infrastructure required from the Local Plan and a strategy for how this will be achieved. The Phase 3 document set out the key planning approaches and issues which are required to deliver the homes and jobs needed and presented three alternative 'lenses' for meeting these needs, to explore the implications of different spatial strategies. The lenses were used to inform and explain the key principles and proposed allocations in an emerging preferred strategy alongside an approach to traveller communities, areas to be safeguarded for renewable energy and safeguarding for minerals and 14 draft policies.
Phase 4 – Topic Paper for Housing Land Supply and Bristol Unmet Need	19.7.2024 to 13.9.2024	A targeted additional phase of consultation focussed on clarifying the process for site selection for the preferred strategy, provision of additional flexibility to meet South Gloucestershire's housing needs and the Council's approach to whether it can assist with meeting any of Bristol City Councils unmet housing need.

A Consultation and Engagement Report on Phases 1 and 2 of engagement was published in December 2023. This report covers Phases 3 and 4 of the Local Plan regulation 18 engagement. Together the two reports will form a part of the 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 consultation. This will 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.

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

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

The following report sets out the detail of Local Plan engagement Phases 3 and 4, 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.

The last section of this report summarises how the strategy and policies in the Regulation 19 Local Plan have been shaped by all 4 phases of the Regulation 18 engagement.

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. We wrote to and 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 early 2022).

The decision of the Metro Mayor of the West of England Mayoral Combined Authority (MCA) on 9th May 2022 to halt all work on the MCA Spatial Development Strategy (SDS) changed the scope and timetable of the South Gloucestershire Local Plan which would 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 have continued with ongoing active engagement with these partners in the preparation of the Phase 3, Phase 4 Regulation 18 consultations and in the preparation of the Regulation 19 Local Plan.

A summary of this ongoing engagement is provided in Appendix 1 of this report. This details how we engaged, and issues raised by our DtC partners in response to the Phase 3 and Phase 4 engagement as well as ongoing work on cross boundary matters. It confirms where there are or are not cross boundary issues remaining between SGC and any DtC statutory body or key stakeholder. Statements of Common Ground between South Gloucestershire Council and statutory DtC bodies will be prepared where appropriate.

Appendix 1 details engagement with the following organisations:

Adjoining authorities:

- Bristol City Council
- Bath & North East Somerset Council
- The West of England Mayoral Combined Authority
- Wiltshire Council
- Stroud District Council
- Gloucestershire County Council
- Forest of Dean Council
- Cotswold District Council
- Monmouthshire Council

Prescribed Bodies:

- Environment Agency
- National Highways (NH)
- Bristol, North Somerset and South Gloucestershire (BNSSG) Integrated Care Board (ICB). (formally the Health Services Commission Board)
- Historic England
- Natural England
- The Civil Aviation Authority
- Homes England
- Office of Rail Regulation (Rail and Road)
- Marine Management Organisation

Key Stakeholders

- Wessex Water
- Bristol Water
- Wales & West Utilities
- National Grid Energy Distribution
- National Grid Energy Transmission
- Avon & Somerset Police

- Avon Fire and Rescue
- Network Rail
- Cotswold National Landscape (CNL) Board
- Nuclear Decommissioning Authority (NDA)
- NHS Property Services

Our approach to engagement

Phase 3: Towards a Preferred Strategy

Engagement took place between December 6, 2023, and February 16, 2024

This stage of engagement featured alternative spatial strategy options as well as a preferred strategy, with many potential site allocations as well as a number of draft policies. The Council's approach to this phase of engagement, as with the previous phases, was to encourage and enable a broad range of stakeholders to understand and respond through the formal online consultation process. 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. However, due to the potential impact of site allocations in this phase there was additional emphasis on face-to-face events in the communities which could potentially be affected.

In summary, the engagement was widely promoted to the public via the Council's website, social media, disseminating information through Parish and Ward councillors, and council networks. Individuals, groups and businesses who had signed up to receive updates on the Local Plan were notified by email and a series of face-to-face events were held. The organisations that the Local Authority has a Duty to Cooperate with, adjoining local authorities and statutory bodies as well as other key stakeholders such as utility providers, were informed by email and invited to respond.

Our strategy for engagement involved a number of types of communications as follows:

- Holding a series of 13 well attended events across the district for the public and local community groups to view maps and exhibition material and talk to council officers and elected members about the contents of the plan. These were spread across a variety of locations and times of day so as to widen the potential attendance. This also included responding positively to requests for additional events from communities during the consultation period. These events are listed below.
- The 2,085 stakeholders on our Local Plan Database were notified with all the details of the consultation directly via email. In addition, the 1,200 stakeholders on the Council's Community Engagement Forum database received an email with details of the

consultation and an invitation to join online events. We also identified contacts representing specific stakeholder groups and offered to hold separate briefings and Q&A sessions with them.

- We used our elected members, town and parish councillors as “ambassadors” to actively promote the consultation in their communities. All were invited to presentations before and during the consultation to familiarise them with the contents of the plan and consultation process and were provided with material to promote the consultation to their communities.
- Extensive use of social media (Facebook, LinkedIn and Twitter) was made to promote different parts of the plan and the face-to-face consultation events. This resulted in 13,600 document page visits to the website and 14,000 visits to the mapping page. Posts reached 67,3K people. (further details below)
- Details about the consultation, with, supporting information, were made available on our website throughout the consultation period. (further details below)
- The consultation documents and supporting evidence were available as digital documents and PDF versions of all or parts of the document provided on request.
- Press releases were written, and articles appeared in Bristol Live, the Gazette Series, Local Voice publications and digital newsletters including the SGC ebulletin which reaches thousands of local households.

Local Plan Phase 3 social media statistics

- **Total posts across all social media platforms:** 42
- **Reach:** 67.3k (total number of people who saw the content)
- **Impressions:** 89.4k (total number of times content was displayed)
- **Total link clicks:** 1.6k

The Local Plan Phase 3 social media campaign demonstrated effective outreach and strong public engagement. By using social media platforms, particularly Facebook, we reached a broad audience and encouraged meaningful interaction. The high engagement rate and significant link clicks reflect public interest in the consultation process and the future development of South Gloucestershire.

Key success factors included:

- **Timely messaging:** Posts around deadlines and specific opportunities to participate resonated most with the audience.
- **Diverse formats:** The use of visual dashboards, links to consultation materials, and a variety of post types contributed to the campaign’s reach.

- **Community engagement:** Emphasising accessible formats, such as virtual pop-up events, ensured inclusivity in the consultation process.

The top performing posts highlighted consultation deadlines, affordable housing initiatives, and community engagement opportunities achieved the highest impressions, with over 12.1k impressions on the most viewed post. Posts encouraging participation in virtual community engagement events also performed well, showcasing a strong interest in accessible consultation formats. The social media campaign successfully encouraged consultation participation with active sharing of posts by followers, indicating community interest and support for the initiative.

Local Plan Phase 3 website statistics

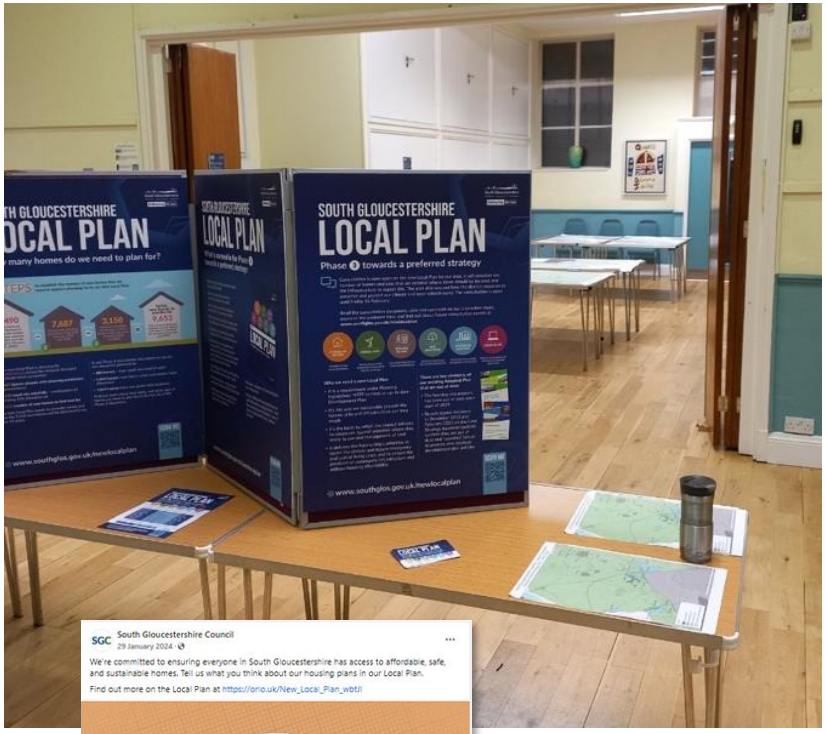
During the Local Plan consultation Phase 3 from 6 December 2023 to 16 February 2024, the Local Plan received substantial website interest:

- The **main Local Plan webpage** (www.southglos.gov.uk/newlocalplan) recorded over 14,000 views, demonstrating a strong public interest in understanding the overall plan.
- The Local Plan – Phase 3 towards a preferred strategy **documents webpage** (https://beta.southglos.gov.uk/publications/local-plan-phase-3-towards-a-preferred-strategy/) attracted over 13,600 views, indicating that stakeholders actively engaged with the detailed proposals.
- There was 1,452 PDF downloads for the **full version of the Local Plan consultation document** (New Local Plan - Phase 3 towards a preferred strategy: Consultation document (Dec 2023)) and 1,481 PDF downloads for the **Easy-read version** (Easy_Read_Local_Plan_phase_3_towards_a_preferred_strategy_consultation.pdf). These figures highlight the importance of making information accessible in different formats.

The consultation-specific webpages also performed exceptionally well, with the **consultation webpage** (https://consultations.southglos.gov.uk/LPP3/consultationHome) achieving nearly 13,800 views and the **consultation questionnaire webpage** (no longer a live webpage) recording 12,500 views. The average engagement time of nearly 15 minutes per user on the questionnaire suggests that participants were highly engaged and invested in providing feedback.


CHARFIELD
VILLAGE HALL
CCTV
NEW
LOCAL
PLAN
Phase 3 towards a preferred strategy
JOIN IN THE
DISCUSSIONS
Where in
South
Gloucestershire?
www.southglos.gov.uk/newlocalplan

SGC South Gloucestershire Council
9 February 2024
There is just one week left to get your comments in on our Local Plan.
The Local Plan will help guide and manage growth and change in South Gloucestershire for the next 15 years.
For more information, please visit https://orlo.uk/South_Glos_New_Local_Plan_KuHAU
You can view and comment on the Local Plan Emerging Preferred Strategy online using the link below.
https://orlo.uk/Emerging_Preferred_Strategy_ZK1d4
Our consultation closes next Friday 16 February.
South Gloucestershire Council
Delivering for you
AFFORDABLE AND NEW HOMES
RENEWABLE ENERGY
EMERGING PREFERRED STRATEGY
ECONOMY AND JOBS
URBAN AREAS AND TOWNS
GREEN NETWORKS
INFRASTRUCTURE REQUIREMENTS
NEW
LOCAL PLAN
Phase 3 towards a preferred strategy
Consultation document (Dec 2023)
www.southglos.gov.uk/newlocalplan
10
13 comments 16 shares


SOUTH GLOUCESTERSHIRE
LOCAL PLAN
Phase 3 towards a preferred strategy


SGC South Gloucestershire Council
29 January 2024
We're committed to ensuring everyone in South Gloucestershire has access to affordable, safe, and sustainable homes. Tell us what you think about our housing plans in our Local Plan.
Find out more on the Local Plan at https://orlo.uk/New_Local_Plan_wbtJI
AFFORDABLE AND NEW HOMES
Where in
South Gloucestershire?
8
11 comments 11 shares
Like
Comment

Phase 4 – Topic Paper for Housing Land Supply and Bristol Unmet Need

Engagement took place between July 19, 2024, and September 13, 2024

This stage of engagement was an additional informal draft Local Plan (Regulation 18) Topic Paper to set out the Council's position and seek view on the following:

1. Further clarification on the process for how the lenses and site locations in Phase 3 were chosen, and the process of site selection to form part of the Emerging Spatial Strategy.
2. Provision of additional supply to provide greater flexibility to meet South Gloucestershire's housing needs.
3. The Council's approach to considering whether it can assist with any of Bristol City Council's (BCC) unmet housing need to ensure the Council continues to discharge the Duty to Co-operate under s.33 A of the Planning and Compulsory Purchase Act 2004 on the cross-boundary strategic issue of BCC's unmet housing.

This stage of engagement was more limited due to the narrow scope and technical nature of the Topic Paper and our strategy for engagement also more limited.

- The 2,085 stakeholders on our Local Plan Database were notified with all the details of the consultation directly via email. This database comprises residents, stakeholders, and community representatives who have previously registered their interest in local planning matters.
- Two digital events were held one during the day and one in the evening. These were advertised in our email above as well as on our Council website. They were open to the public as well as elected members and Town & Parish Councillors to explain the content of the consultation, give information on the consultation process and how to comment and answer any questions.
- Social media and press release: The consultation was promoted on our social media channels (Facebook and X/Twitter) on 22 July 2024. Additionally, a press release was issued on 18th July to inform the public about the consultation, which can be viewed here (further detail below).
- Website and online information: Details about the consultation, including the Topic Paper, supporting information, and a flyer, were made available on our website throughout the consultation period. (further details below).

Local Plan Phase 4 social media statistics

- **Total posts across all social media platforms:** 6
- **Reach:** 27.8k
- **Impressions:** 31.9k
- **Total link clicks:** 597



The top performing posts included the **launch announcement post** (22 July 2024) with 20.9k impressions (the number of times a user sees content from a social media account) which encouraged residents to participate and provided links to consultation details, and the **consultation reminder post** (31 July 2024) with 8.8k impressions which promoted the virtual consultation meetings on 1 August to boost engagement.

Local Plan Phase 4 website statistics

During the Regulation 18 - Local Plan Topic Paper for Housing Land Supply and Bristol Unmet Need consultation (Phase 4) from 19 July to 13 September 2024, the local plan received the below website interest:

- The **main Local Plan webpage** (www.southglos.gov.uk/newlocalplan) received just over 5,000 views, this number is most likely attributed to the narrower focus of this phase.
- The **Consultation webpage** (Regulation 18 - Local Plan Topic Paper for Housing Land Supply and Bristol Unmet Need consultation) recorded 8,135 views, reflecting targeted interest in specific aspects of the Local Plan.

Phase 3: Regulation 18 Consultation – Towards a Preferred Strategy

Key Phase 3 Engagement Activities

The table below is a summary of all the key consultation activities in the third phase of the Plan's preparation, which alongside the communications noted above, enabled stakeholders to understand and provide views on the Plan.

Date	Activity	Stakeholders Engaged
14/11/2023	Town and Parish Council Forum. Digital drop-in event to provide information/ Q&A	Parishes and Town Councils Clerks and members
30/11/2023	Digital drop-in event to provide information/ Q&A Introduction to new Local Plan	Councillors and Parishes and Town Councils
06/12/2023	**Email Out to all Inovem Contacts:** South Gloucestershire Council - New Local Plan (Consultation on the third phase of the new Local Plan for South Gloucestershire) **Purpose:** to formally announce details of the consultation.	Local Plan consultation list: All 1,727 stakeholders who have expressed an interest in the Local Plan including "Duty to Cooperate" partners.
09/01/2024	Pop-up event - Hanham Community Centre	East Fringe Focus (General Public)
10/01/2024	Two Digital drop-in event to provide information/ Q&A	General Public
11/01/2024	Pop-up event - Yate Tesco Superstore	Urban and Town centres Focus (General Public)

Date	Activity	Stakeholders Engaged
12/01/2024	Pop-up event - Charfield Village Hall	Rural Communities Focus (General Public)
15/01/2024	Pop-up event. Warmley Community Centre	East Fringe Focus (General Public)
16/01/2024	Two Digital drop-in event to provide information/ Q&A	General Public
17/01/2024	Pop-up event. Mangotsfield Football Club	East Fringe Focus (General Public)
17/01/2024	South Glos Equalities Forum. Digital drop-in event to provide information/ Q&A	Equalities Forum
18/01/2024	**Email Out to all Inovem Contacts:** Local Plan Phase 3 Consultation Update (Consultation Period Extended until 16th February) **Purpose:** to formally announce extension of the consultation.	Local Plan consultation list: All 1,599 stakeholders who have expressed an interest in the Local Plan including “Duty to Cooperate” partners.
19/01/2024	Pop-up event: Emersons Green Village Hall	East Fringe Focus (General Public)
19/01/2024	Bristol Property Agents. Drop-in event to provide information/ Q&A	Commercial promoters
22/01/2024	Pop-up event. Pucklechurch Community Centre	Rural Communities Focus (General Public)
23/01/2024	Pop-up event. Almondsbury Old School Hall	North Fringe Focus (General Public)

Date	Activity	Stakeholders Engaged
24/01/2024	Pop-up event. Easter Compton Village Hall	North Fringe Focus (General Public)
24/01/2024	South Glos Climate and Nature Community Engagement Meeting	Climate and Nature Community
25/01/2024	Pop-up event. Shortwood Methodist Church	East Fringe Focus (General Public)
29/01/2024	Pop-up event. Thornbury Turnberrie's Community Centre	Urban and Town centres Focus (General Public)
30/01/2024	Pop-up event. Chipping Sodbury Town Hall	Urban and Town centres Focus (General Public)
31/01/2024	Pop-up event. Henfield Hall, Coalpit Heath	East Fringe Focus (General Public)

Phase 4: Regulation 18 Consultation - Topic Paper for Housing Land Supply and Bristol Unmet Need

Key Phase 4 Engagement activities

This was a targeted consultation on 3 focused aspects of the Local Plan. The table below is a summary of the consultation activities in the fourth phase of the Plan's preparation, enabled stakeholders to understand and provide views on the Plan.

Date	Activity	Stakeholders engaged
19/07/2024	**Email Out to all Inovem Contacts:** South Gloucestershire Council Local Plan Regulation 18 Consultation - Topic Paper for Housing Land Supply and Bristol Unmet Need **Purpose:** to formally announce details of the consultation.	Local Plan consultation list: All over 1,500 stakeholders who have expressed an interest in the Local Plan including "Duty to Cooperate" partners.
25/07/2024	**Email Out to all Inovem Contacts:** South Gloucestershire Council Local Plan Regulation 18 Consultation - Topic Paper for Housing Land Supply and Bristol Unmet Need - Pop-up meetings **Purpose:** to formally announce dates and content of the pop-up meetings scheduled.	Local Plan consultation list: All 2,085 stakeholders who have expressed an interest in the Local Plan including "Duty to Cooperate" partners.
01/08/2024	Two Digital drop-in event to provide information/ Q&A	General Public

Summary of Main Issues Arising from Regulation 18 Consultation Phases 3 &4

Introduction

This section provides concise summaries of the responses received in phases 3 and 4 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, 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. A summary of how consultation has influenced the plan is set out in the last part of this report.

The full responses to all four stages of Regulation 18 consultations have been published on the Council's website and are available to view here Local Plan Representations Portal - South Gloucestershire Online Consultations.

A Consultation Statement produced under Regulation 22(1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 will be provided 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 3: Towards a Preferred Strategy

Q2 Council Priorities and Local Plan Objectives
Q3 Planning for Economy and Jobs
Q4 Planning for Town Centres
Q5 Planning for Infrastructure
Q6 Urban Areas and Market Towns
Q7 Towards a Preferred Strategy
Q8 Strategy Lens: No Green Belt Loss
Q9 Strategy Lens: Urban Edge
Q10 Strategy Lens: Transport Corridors and Hubs
Q11 Planning for Gypsies Travellers and Travelling Showpeople
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Q14 Strategic Green Infrastructure Corridors, Strategic Viewpoints and Visually Important Hillsides
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Q22 Mineral working and restoration
Q23 Energy Management in New Development
Q24 Embodied Carbon
Q25 Renewable and Low Carbon Energy Systems
Q26 Community Energy
Q27 Internal Space and Accessibility Standards
Q28 Strategic & Major Sites Delivery Policy
Q29 Stewardship Policy

Phase 4

Q2 Emerging Spatial Strategy – Site Selection Process
Q3 South Gloucestershire's Housing Need
Q4 Council's Approach to whether it can assist with Bristol City Council's Unmet Housing Need

Phase 3 Towards a Preferred Strategy – Summary of responses to consultation questions

Introduction

This section provides concise summaries of the responses received in phases 3 and 4 of consultation. All consultation responses were collated, analysed and thematically

Q2 Council Priorities and Local Plan Objectives

Do you have any comments on the Council's priorities and Local Plan objectives?

Summary of comments

General comments

- The public, Parish and Town Councils and development industry supported the objectives as whole, but some felt they were contradictory or conflicting in parts. Members of the public and others thought environment, climate and protecting the Green Belt objectives should be prioritised. Many developers thought meeting housing needs should take priority. To address conflicts, it was suggested that objectives should be weighted.
- Climate and sustainability are cross cutting and should be presented as overarching objectives.

<u>Objective 1 – New homes for all communities</u>

- Members of the public and Parish & Town Councils preferred small scale growth spread across the district to meet the needs of local communities and avoid the loss of Green Belt land.
- Support from the public and Parish & Town Councils for meeting the needs of all communities including allocating sites for Gypsy and Travellers.
- The development industry supported allocating sufficient sites to meet identified housing need, but this should be a minimum. SGC should be meeting unmet needs of neighbouring authorities under the Duty to Cooperate.
- The development industry generally supported approach to identifying a range of sites across rural and urban areas in a range of sizes.

Objective 2 – Travel and transport

- There was general support for encouraging low carbon modes of transport and improvements to pedestrian safety.
- Some members of the public and Parish & Town Councils disagreed that balancing jobs and homes within an area would reduce commuting flows or that active travel would replace car use. Others said that new homes should not be built until employment opportunities had been provided. Improving public transport must be a prerequisite to housing growth and transport infrastructure should be delivered alongside development.
- Some Parish & Town Councils were concerned about the negative impact of additional traffic on the local road network and air quality and lack of viable plans to achieve this objective.
- Support from development industry for this objective. Some commented that there should be recognition of the potential role of self-containment to reduce car trips in large scale new developments. Object to the word “small” for rural developments as proposed allocations range in size up to 775.

Objective 3 – Climate, nature and heritage

- Members of the public, Parish & Town Councils and community groups generally supported climate, flood risk, heritage and nature objectives and objected to loss of Green Belt and greenfield land to provide new homes as contradictory to climate landscape, heritage and nature objectives.
- Strong support for Biodiversity Net Gain from the public and Parish & Town Councils. Some thought that the target should be increased to 20%. The development industry generally supported 10% BNG but objected to any increase in this percentage. The Local Plan and any SPDs should align national policy and not deviate from this. There were concerns about the delivery mechanism and process for BNG
- Some Parish Councils wanted a new objective specifically relating to nature recovery.
- The Woodland Trust, National Trust and local councillors supported new tree planting and a target for tree canopy cover through retention of existing and new native tree planting.
- Parish & Town Councils supported this objective and emphasised the need to better manage the impact of development on and consequences of flooding and improve the evidence base on flood risk.
- Members of the public and Parish & Town Councils wanted to see a new objective relating to protecting the best and most versatile agricultural land.

Objective 4 - design and place-making

- Members of the public and Parish & Town Councils supported objective but said that recent new developments had not met good placemaking goals.
- Some Parish & Town councils said that large scale developments would impact negatively on existing character of communities.
- Some in the development industry supports the objective but concern that it will increase the cost of construction and should be tested through the Plan's viability assessment.
- Some in the development industry objected to "net zero" or "zero carbon" objectives. These are unjustified and should be deleted from the objective.

Objective 5 - Jobs and businesses

- Some members of the public supported a stronger focus on reducing commuting through a refined locational strategy. Others and some Parish & Town Councils felt that it was unrealistic to assume that people want to, or can, live and work in the same place and that existing commuting patterns demonstrate the distances people travel to work.
- Members of the public and Parish & Town Councils supported the goal of increasing job opportunities and supporting the economy but also argued that unless more jobs are provided and they are delivered before homes then increasing population especially in low employment areas would push down the jobs per person ratio.
- Support for protecting employment land from residential development from the public and businesses, subject to flexibility across key sectors.
- The public and Parash & Town Councils wanted to replace "rethinking" High Streets and replace with "work with".
- The development industry supported the provision of employment land to meet evidence based need and promoters of sites in the East Fringe and others supported the objective to rebalance employment provision in the East Fringe of Bristol.
- Development industry also sought recognition of the need to enhance the vibrancy of out of town office development through mixed use development and improved connectivity.
- Some Parish & Town Councils wanted more recognition of the importance of rural, seaside and tourism to the economy.

Objective 6 – deliverability and viability

- Members of the public and Parish & Town Councils strongly supported the provision of supporting infrastructure as existing is already under strain. It was felt that this had not been provided in an adequate or timely way in recent developments.
- Some Parish & Town councils felt that this should be of critical importance in deciding the location, scale and nature of development.
- Many in the Development Industry supported in principle the need to provide sufficient supporting infrastructure and to use existing capacity where possible. Others said that it should not be the sole starting point for decisions on the location of development and that in practice some sites would not be able to contribute due to viability issues.

Q3 Planning for Economy and Jobs

3a. Do you have any comments on the 2 urban option sites which are on safeguarded employment areas?

Summary of comments

- SG-07 Land West of A38 and South of Hallen Railway Line
  - Support from the site promotor, 1 Parish Council and the University which commented that the option for mixed use should not undermine existing lawful employment operations.
  - Concern from a developer for SG-07 due to its proximity to neighbouring Golf Course Lane site.
- SG-15 Bristol Uniforms
  - Support from a developer for intensification, however, do not consider it an 'option' as there is a planning application for redevelopment of the site.

3b. Do you have any comments on the 2 proposed site allocations which are on safeguarded employment areas?

Summary of comments

- SG-19 North of Douglas Road
  - Support for mixed use from site promoter but with less employment.
  - Object – should be retained for employment from 1 Parish Council.
- SG-51 University of the West of England/ Hewlett Packard
  - Site promoter would like reference to academic as well as employment uses.

- A developer thought that this should be allocated for student accommodation.
- One Parish Council objected as should be retained for employment.

3c. Do you have any comments on our proposal to continue safeguarding these areas for employment?

Summary of comments

Members of the public and Parish Councils

- Support for the principle of safeguarding sites across the district to enable access to jobs.
- Empty offices should not be safeguarded as working practices have changed.
- Mixed use should be considered on a wider range of sites.
- Support for retaining and enhancing access to, employment sites within the East Fringe to reduce employment imbalance although also concern that the proposed housing developments will only exacerbate the existing situation.
- More smaller employment sites should be safeguarded especially in the East Fringe.
- Some felt it was important to retain employment on all safeguarded sites in Yate and Chipping Sodbury although others thought that that due to the impact on the road network these should be relocated to close to the strategic transport network or that some should become mixed use.
- Support safeguarding in the Winterbourne area.
- Some object to continuing safeguarding of SEA37 Thornbury Industrial Site due to impact on local road others support continued safeguarding and recommend adding the Crossways site.
- Object to the proposed extension of the Severnside employment area.
- Concerns about the impact of transport arising on local roads and communities in particular impact of distribution uses.
- New employment sites should be provided better connected to transport network in some areas.

Developer, land agent or site promoter

- Support for evidence of quantitative and qualitative need for employment land and space and for the Council's approach to type and nature of employment development in safeguarded areas.
- Support recognition that this Severnside is of regional and national importance.
- Agree East Fringe has a long-term issue with loss of employment and lack of jobs for local workers.

- Thornbury would benefit from more office space so support employment safeguarding.
- Support continued long safeguarding at Astec West for the full range of employment uses.
- Seek clarification of status of Ladden Village employment land.
- Promotor of land at Severnside would like range of uses extended to include office and R&D.

The University of Bristol supported the safeguarding of Site 12a (Emersons Green Science Park).

Q4 Planning for Town Centres

Do you have any comments on our proposed updates to the primary shopping area and wider town centre boundaries?

Summary of comments

Members of the public

- No indication of local shops for additional housing next to the East Fringe.
- Housing growth in Thornbury has not been supported by local shops.
- Increased footfall and traffic from new developments to existing town or local centres needs to be considered.
- Comments relating to specific sites in town centre and primary shopping area boundaries.

Parish Councils

- Support for proposed boundary updates.
- Neighbouring Parish areas rely upon services and facilities in Yate.

Developer, land agent or site promoter

- Evidence should be provided to support proposal for retaining existing allocations only and not allocating further sites.
- Cribbs Mall should be allocated for retail and leisure uses.
- Framework needed to manage Brabazon.

- Support for Primary Shopping area changes at Stoke Gifford.

Q5 Planning for Infrastructure

5a. The Infrastructure Position Statements (IPS) sets out information on what is currently planned and how planning for each type of infrastructure is currently undertaken. Moving forward we would welcome views, particularly from developers & infrastructure providers on how infrastructure could be brought forward in a more timely way during the development process.

Summary of comments

Most comments received on this question concerned general infrastructure planning principles, rather than specific reviews on the delivery of infrastructure in a more timely way.

General principles

- Most respondents considered that new development should be as 'infrastructure efficient' as possible, located in areas with existing services and facilities. However, comments from members of the public and Town and Parish Councils noted that this should not allow developers to avoid meeting the infrastructure needs generated by their development.
- Many members of the public expressed opposition to development on Green Belt land, citing its ecological and recreational importance. Some advocated for development to occur on brownfield sites, for infrastructure reasons.
- Members of the public and community groups expressed the need for infrastructure to be delivered before development is completed – if adequate infrastructure cannot be delivered before development, development should not proceed. Many comments suggested this approach is not currently followed, resulting in mistrust that proper infrastructure will be provided in the future.
- Town and Parish Councils raised concerns about the inconsistent approach to developing and upgrading infrastructure currently followed, citing insufficient engagement with key stakeholders and questioning the robustness of the decision-making process.
- There were concerns that a comprehensive Infrastructure Delivery Plan is not yet available to guide infrastructure provision.

Transport

- There is concern from members of the public, community groups, and some Town and Parish Councils that the proposed additional homes will lead to unmanageable traffic congestion. Many feel that the current road network is already over capacity and want to see improvements before more development takes place.
- Members of the public and community groups expressed concern that increased car use and congestion will worsen road safety for active travellers and wildlife, noting that road widening will create more dangerous conditions. They expressed a desire for more investment into pedestrian safety and traffic calming measures.
- Town and Parish Councils and some members of the public support active travel and sustainable transport corridors but raised concerns that an over-emphasis on this form of provision may exclude older people, and those in rural areas.
- Many comments from the public and Town and Parish Councils seek an improvement to the frequency and reliability of local bus services.
- Comments from Town and Parish Councils requested park-and ride schemes in specific locations.
- Some members of the public viewed investment into Charfield Station negatively, with views put forward that there will be low ridership. There are also concerns that local development will be necessary to provide developer contributions for the scheme, when it was previously indicated that it would be funded externally.
- There were concerns about the lack of published transport modelling as a basis for site selection decisions – with some developers suggesting that inconsistent decisions have been made about the extent to which capacity constraints exist between sites.

Social infrastructure

- Many members of the public and Town and Parish Councils feel existing local infrastructure is under severe strain. Many indicated the pressure local schools and healthcare services are under and are concerned further development will exacerbate this issue unless services are improved to service new households.
- Some developers queried the availability of surplus places within existing schools, and consider that available evidence is unclear.
- It was suggested that some proposals around new schools would be unviable – e.g. because a location would rely on a new one-form-of-entry school, which is not considered viable in education provision terms.
- Healthcare infrastructure requirements arising from growth should be properly quantified and deliverable. Where on-site primary care facilities are not requested but a community facility is provided, the Local Plan should permit the NHS to utilise that facility when necessary to deliver NHS community services.

Green infrastructure and flood risk

- Community groups and Town and Parish Councils suggested green infrastructure policies should include biodiversity measures.
- Members of the public and Town and Parish Councils have pointed out existing drainage and flooding issues in the area and are concerned that additional development will worsen flooding risks, particularly with the increased risks of high rainfall and sea level rise from climate change. They support the use of cost-effective soft bio-engineering solutions and would like to see this considered and appropriately accounted for in any additional development planning.

5b. We have to understand development economics in order to ensure infrastructure, where needed, is affordable and deliverable. We therefore would welcome feedback, particularly from developers and land agents on the proposed issues, methodology and inputs in undertaking a full Viability Assessment, as set out in the Viability Position Statement (VPS).

Summary of comments

- There were limited comments from developers on this question (although comments were made elsewhere about viability, e.g. that policy requirements such as affordable housing, climate mitigation and biodiversity net gain will make development unviable).
- It was however suggested by developers that site-specific approaches to viability are not considered, e.g. the ability for particular sites to be allocated in order for particular locally-needed infrastructure schemes to be delivered.
- Some members of the public felt that any viability assessment should ensure that development only goes ahead where necessary improvements or additions to the infrastructure network are provided first.
- Some members of the public questioned the viability of the plan, noting that some chosen development locations were on privately-owned land that they considered unlikely to be sold for development.

Q6 Urban Areas and Market Towns

6a Do you have any comments on any of the 15 proposed urban or market town site allocations?

Summary of comments

General

There was some support from the development industry for the strategy of making the most efficient use of land. However, concerns were raised about the risk of over reliance on brownfield allocations which may be undeliverable. Further evidence on capacity, viability and delivery timescales should be provided to support this policy.

Some Town and Parish councils thought that all brownfield sites should be used for housing and supported additional housing where facilities already exist to reduce greenfield development.

North Fringe

NF002	Old Gloucester Road	• Support from developers and promoters for at least 30 homes. Consider site is deliverable and developable • Objection from Parish council as next to the motorway and unsuitable for residential uses and ecological value of the site including role in ecological networks.
NF005	Oxbarton Mead	• Reduce capacity from 8 to 6 to reflect planning permission P22/03115/F
NF008	UWE	• Safeguarded employment land and student accommodation supported on this site to take pressure off surrounding area. • Site has been identified for nature recovery this needs to be accommodated on site allocation. • Further development will put unacceptable impact on local roads. • Better access to Abbey Wood train station from the campus should be enabled through this site.
NF009	Filton Clinic	• Development industry concerns about viability. • Public support subject to maintaining or relocating existing clinic.
NF11	Filton Retail Park	• Support student accommodation as an appropriate use in this location

East Fringe

General

- Members of the public were concerned that local road, sewage and water infrastructure would be unable to cope with new development in this urban area

EF001	Lyde Green Road	• Some concern from the development industry about the capacity of the site and relationship to adjacent sites and delivery in light of these issues.
EF003	Lucas Works	• Parish Council and members of the public felt should be safeguarded for employment uses. • Development industry confirmed that there is a live planning application for mixed use which demonstrates availability.
EF006	Lyde Green Farm	• Concern from the development industry about capacity in light of planning history. • Members of the public were concerned about loss of existing hedgerows with high biodiversity value, loss of green space, impact on the historic Dramway, and important butterfly habitat and populations.
EF010	Downend Clinic	• Developer had concerns over viability • Public support for making best use of site by mixing health and residential but concern that capacity may be too high.
EF013	The Grange	• Concern over loss of sporting facilities, impact on existing infrastructure from members of the public. Access via Baden Road should only be for walking and wheeling.
EF014	Ansteys Road, Hanham	• Some members of the public were concerned about amount of homes on the site, insufficient green space, access, impact on local roads, local shops not being sufficient to cope with additional trade. Others felt that this should have a larger employment element. • Development industry and member of the public supported this site and felt it was viable due to Homes England involvement.
EF15	Broad Street, Staple Hill	• Development industry did not think the site would come forward if the current use as a gym is profitable.

Yate

YA001	Yate Town Centre	• Support from Parish councils for this allocation and more housing allocations should be identified in Yate due to its enviable range of services and facilities, good public transport links, public investment, Yate Masterplan and higher level of residents working in the area. Some members of the public thought that there should be no housing allocations in Yate or Chipping Sodbury. • Support from members of the public for measures to enhance, modernise and improve the viability of the town centre and public transport. However, some objected to any housing on the town centre. • Support from Yate town council supports homes intended for older residents, improving public transport, better walking, wheeling and cycling infrastructure. • Concern raised by Parish Councils re how parking will be accommodated in higher density development given its role as a service centre for rural communities who need to drive to access the town centre. • The development industry questioned the viability and availability evidence. • The site promoters supported the allocation but stated that it could accommodate significantly more homes and up to 500dph. Viable redevelopment will not be possible at 120 dph, Density and Character Study is not sufficient justification for 120 dph. The figure of 200 should be a minimum in the policy allocation. The Yate town masterplan height prescriptions are not justified along Station Road and Kennedy way.
YA003	Land North of Ladden Garden Village	• Developers support this site allocation. Capacity may be reduced due to site constraints but it will come forward in time. • Parish Council raised concerns about access impacting the local road network and lack of buses to serve this area. • Yate Town Council supports a further 200 homes in this area as a fair and proportionate share of the housing need for SGC.

Thornbury

General

- Parish and Town councils thought that more brownfield allocations should be identified in Thornbury due to its range of services and facilities and recent investment in the High Street and transport infrastructure on the A38. Thornbury has better self-

containment in terms of residents and workers that some other areas and approach to this issue is not consistent across the area.

TH001	Thornbury Health Centre	Some support - subject to relocation or retention on site of the health facilities. Some object - health facilities in the town are already inadequate

6b Do you have any comments on the 2 proposed urban allocations with options for different uses?

Summary of comments

NF004	Filton 20 Golf Course Lane	• Most respondents including parish councils the public and promoters supported mixed use for this site as a good location for housing as well as employment, but some felt it should continue to be safeguarded for employment. • The site needs direct access to the new Filton Rail station to the north as well as connectivity to Filton Abbey Wood and Parkway to support rail as a viable option for transport.
EF16	Bristol Uniforms	• There was both support and objection to allowing this site to move from employment to mixed use. • Those who objected felt that this would exacerbate the shortage of jobs in the area and that there was insufficient evidence that the site could not be redeveloped for new employment uses. • Those who supported included the site promoters as well as members of the public who felt it was a good site for residential as close to routes to other employment locations and would reduce greenfield development.

Q7 Towards a Preferred Strategy

Do you have any comments on our emerging preferred strategy (EPS)?

Summary of comments

General comments: Members of the Public, and Town and Parish Councils

Support for strategy

- Consider that the EPS provides a balanced overall solution (compared to the three lenses) – delivering smaller developments in rural areas, whilst proposing larger sites in locations close to good transport links.
- Consider that the EPS has an appropriate balance of development, with less growth in locations that have recently grown disproportionally and have insufficient infrastructure for further growth.
- Support the approach to focussing development closer to Bristol and other employment locations, to limit commuting distances, with sustainability benefits.
- It is pragmatic to undertake some development in the Green Belt in the Urban Edge around Bristol, given that this makes up around 40% of the district's land area. Amending the Green Belt boundaries does not set a precedent.
- Comments in the support of the strategy were often caveated, indicating views that infrastructure provision and mitigation (for example to protect the environment) are necessary as part of development.

Concerns around EPS and distribution of development

- The EPS will not balance jobs and homes and will not reduce commuting flows or encourage active travel.
- The Council is taking the same approach as previous Local Plans and is not considering shifts in working patterns to account for more people working from home.
- Smaller sites should be favoured, to avoid overwhelming existing facilities, infrastructure, and services.
- Development should be spread more evenly across South Gloucestershire rather than being concentrated in particular locations – for example to reduce congestion impacts.
- The housing targets and underlying population growth projections informing the EPS are wrong, and the Council should be resisting Government pressure to meet housing targets.
- The Council should also not be assisting in meeting unmet needs from Bristol – this should be met within Bristol.
- Concerns that new homes will not be for local people.
- A new, radical housing policy is required. The Council should explore implementing a progressive social housing policy that allocates council houses based on current family needs rather than as permanent residences.
- The EPS needs to include more housing for older people, to free up family homes and reduce the need for new development.

Concerns around infrastructure capacity

- General views that infrastructure and services are already constrained – in terms of highways, public transport education, healthcare and other services, and development cannot take place until these constraints are addressed.
- Public transport provision across South Gloucestershire is generally inadequate and cannot support new development.

- The consultation recognises that infrastructure is lagging behind new development but does not adequately address this. The Council has already failed to build the needed additional M4 junction.
- More needs to be done to serve development by rail - current services are underutilised and unreliable.

Objection to the principle of Green Belt development

- The Green Belt is protected and should not be developed. Exceptional circumstances for the loss of Green Belt land have not been demonstrated.
- Development in the Green Belt will lead to the potential coalescence of Bristol and settlements in South Gloucestershire, contrary to the purposes of including land in the Green Belt.
- A loss of Green Belt will lead to reduced access to green spaces and recreational land for leisure purposes, negatively impacting quality of life and mental and physical health.
- A loss of Green Belt will have unacceptable impacts on the environment and biodiversity – any mitigation proposed to protect habitats and wildlife corridors will not be adequate. The Council is ignoring its Climate Emergency Declaration.
- A loss of Green Belt will change the character and landscape of South Gloucestershire. The Council is ignoring its Landscape Character Assessment in considering bringing Green Belt sites forward.
- Development should not take place on Best and Most Versatile (BMV) agricultural land.
- The Council is only considering Green Belt and other greenfield development because it is cheaper than development on brownfield land – this is not sufficient justification.
- The Council should increase development densities so that there is no need to build on Green Belt sites.
- If it is genuinely necessary to remove land from the Green Belt for development, new Green Belt should be designated elsewhere in order to offset the loss.

Miscellaneous general comments

- Highlight that the M4 runs through both Wiltshire and South Gloucestershire however little is said about the importance of this corridor in terms of economic potential.
- General concerns that comments are being sought now based on an anticipated strategy, but sites can receive planning consent and still be amended post-consent to remove important elements.
- Local Plan fails to address the need for tourism and leisure facilities outside of town centres to allow the rural and seaside economies to prosper.

Community petition comments

- Community petition against the plan to build houses on Green Belt within the East Fringe of Bristol - from Oldland Common, Bridgeyate, Warmley, Siston, Hanham to Shortwood and Lyde Green. Reasons to object: Protected Green Belt/Environment, Infrastructure, Social, History.

- Community petition in favour of Lens 1 – No Green Belt Loss and against EPS strategy. This community is against the plan to build houses on Green Belt. They want the SGC to utilise brownfields and empty housing opportunities instead of virgin Green Belt land. Reasons to object: Protected Green Belt, Government Policy, Infrastructure, Social, History.

General comments: Development Industry

Support for strategy

- The development industry generally welcomed progress on the Local Plan, and steps to deliver new housing.
- Particular support for the principle of releasing land from the Green Belt in order to meet development needs – with developers considering it clear that exceptional circumstances to justify this exist.
- The nature of responses from the development industry, which mainly come from developers whose sites have not been selected for inclusion in the EPS, means that most responses did not state explicit support for the site selection approach in the strategy. However, responses from developers whose sites were included in the EPS indicated a view that the approach taken was logical.
- Similarly, whilst many respondents challenged the finer detail of the strategy where it did not result in the proposed allocation of their site, there was broad support for the EPS's principle of locating development close to transport links, other existing infrastructure, and centres of employment. This was considered to be sustainable.
- The principle of dispersing development around South Gloucestershire, rather than focussing on one particular location (per the lenses considered elsewhere), was also generally supported.

Evidence base and site selection

- Concerns that some site selection decisions do not respond to evidence, and are conflicting and contrary.
- The lenses approach is confusing – a different approach to site selection would have been beneficial, e.g. consideration first against the Local Plan objectives, and then secondly against topics within the Sustainability Appraisal. This would make it clearer how the EPS has been arrived at.
- The Sustainable Rural Villages and Settlements Ranking Methodology does not appear to have informed decisions or been recently updated. A settlement hierarchy should be included in the next iteration of the Local Plan.
- In the absence of transport modelling and other infrastructure evidence, it is unclear how the Council has been able to establish that the sites in the EPS are deliverable. Equally, in the absence of such evidence, it is unclear how the Council has been able to determine that some major development locations would be unsuitable because of transport constraints.

- A large number of comments from developers sought to promote the benefits of sites not included in the EPS and put forward their case for why their sites should have been included (either in addition to EPS sites, or instead of them). These comments have not been summarised in detail below, but have informed ongoing site selection work alongside the Local Plan process.

Number of homes required in South Gloucestershire

- The proposed housing target does not represent a 'significant boost' to housing provision as envisaged by the Government, with levels of provision comparable to the existing 1,350 dwellings per annum requirement in the Core Strategy. Significantly higher levels of provision are required (a variety of developers have proposed a variety of alternative figures).
- Level of jobs growth expected is unjustifiably less than previous rates of growth – evidence indicates that this results in additional 19,500 jobs, which is not being accommodated by the housing target. This will have adverse economic implications.
- Insufficient supply through in the current Core Strategy has led to increased demand for housing, worsening affordability, and meaning that many more new homes are now required.
- Whilst South Gloucestershire's Housing Delivery Test is 133% (vs. the required 100%), this is only because the Core Strategy target is historically low and was recommended for early review (that has not taken place).
- Affordable housing will mostly be delivered on greenfield sites due to viability. The proposed housing target will therefore only allow around half of affordable housing needs to be delivered. A higher overall housing target is required so that all of South Gloucestershire's affordable housing needs can be delivered against.
- Further consideration should be given to student housing and house in multiple occupation (HMO) provision, as a result of additional students at UWE.

Meeting any adjoining authorities' unmet needs

- SGC should contribute to meeting unmet needs from Bristol (or otherwise prove that it is unable to do so) – the current approach will perpetuate historic under-provision across the wider housing market area.
- Housing needs have no boundary. There is an annual net migration of around 650 households from Bristol to South Gloucestershire, these needs have to be addressed. This is partly because Bristol's Local Housing Need Assessment identifies a need for an approx. 60/40 split between houses and flats across the housing market area, but delivery in Bristol is mostly flats.
- There is no evidence that the Council is complying with the Duty to Cooperate with Bristol and other authorities regarding addressing unmet housing needs across the housing market area. Unmet needs could range between 10,000 and 22,000 homes, yet there is no plan to deal with and accommodate this. Some responses suggested that this is a legal compliance issue.

- It was suggested that development within the North Fringe and East Fringe is effectively an extension to Bristol and should therefore count towards meeting Bristol's housing needs – with sites in the remainder of South Gloucestershire contributing to South Gloucestershire's own needs.

Assumptions and allowances within housing supply

- There is insufficient flexibility and contingency – a buffer of 10% minimum (others suggesting 10 – 20%) should be applied to the housing target to allow for flexibility and unforeseen delays (i.e. build costs, labour / material shortages).
- There is an over-dependence on commitments – a lapse rate of 10-15% should be applied to allow for sites with permission not coming forward. Sites that have already been completed should also not also contribute to the plan period target.
- There is an over-reliance on windfalls – this does not reflect a positive plan-led approach. The windfall evidence comes from a period in which the Core Strategy has been aging, demonstrated by a large amount of windfall completions being on greenfield sites – these historic rates cannot be expected to continue.
- If a windfall allowance is made it should support the overall flexibility of the Plan, rather than being a component of the housing supply offset against housing needs.
- A 5-year land supply and an indicative housing trajectory for the new Local Plan should have been included in the consultation.

Meeting economic development needs

- There is a shortfall of both industrial and R&D floorspace across South Gloucestershire, which the EPS does not propose sufficient sites to address.

Comments on development in the North Fringe

General comments

- In common with comments about development across South Gloucestershire as a whole, members of the public and Town and Parish Councils expressed a range of concerns around infrastructure constraints within the North Fringe and their implications for development – in terms of highways, public transport, education, healthcare and other services – as well as air quality.
- Comments from members of the public and Town and Parish Councils also objected to the principle of development in the Green Belt across the North Fringe – and resultant losses of green space, recreational facilities and impacts on the environment.
- There were views that the North Fringe is particularly vulnerable to flooding and is not a suitable location for development.
- The North Fringe contains a range of underused light industrial areas (such as Aztec West and Avonmouth) – these should be redeveloped for residential uses rather than undertaking new greenfield development.

- Comments in support consider that the North Fringe already performs well in sustainability terms and should therefore be a priority for future development given its close links into Bristol. Given this, some developers suggested that the North Fringe should accommodating larger amounts of development.
- It was noted that development in the North Fringe could provide opportunities for new infrastructure provision – such as enhanced healthcare capacity.
- Comments from developers suggested that more growth should be proposed for Pilning, which has not grown for 20 years, but will soon be served by improved rail services. Housing growth would also support local employment growth.

Specific comments on individual sites, additional to the general comments above, include:

EPS-SV1	Land South of Gloucester Road, Almondsbury	• Development on the site will contribute to the loss of the valued, rural character of Almondsbury. • Opposition to high-density development, although support for projects similar to Hortham Village, which include reserved green spaces and footpaths. • The site will be impacted by noise and safety issues relating to test flights from the adjacent helicopter base.
EPS-SV3	Land at Hortham Lane, Almondsbury, BS32 4JH	• Concern about the site being disjointed from the rest of Almondsbury and relative issue in terms of connectivity and accessibility. • The site has previously had permission refused for residential development due to unsatisfactory access. This issue remains.
EPS-SV8	Recreation Ground Oaklands Drive, Almondsbury	• Development on the site will contribute to the loss of the valued, rural character of Almondsbury. • Opposition to high-density development, although support for projects similar to Hortham Village, which include reserved green spaces and footpaths. • Development will be detrimental to the environment and wildlife of Oaklands and of the surrounding area.
EPS-SV9	Land Off Tockington Lane, Almondsbury	• The site will form backland development and is not suitable.

EPS-SV10	The Quarters Colony Farm	• The site is not well related to existing facilities and consideration needs to be given to distances for pedestrian use. • Concern about the access to the site from A38. • Development on the site will change the character of the village.
EPS-PSB1	Land south of the B4055, Easter Compton	• Concern that Easter Compton is a small village, and lacks the necessary infrastructure to accommodate development – for example there is no local school. • There is a lack of employment opportunities in Easter Compton to accommodate an increase in population, making development unsustainable. • Development on the site will change the character of the quiet village and make it more urban. • The site contains gas pipelines and electricity pylons and is not suitable for development. • Development on the site will impact a number of heritage assets. • Concerns that acceptable construction access will be difficult. • The site has previously had permission refused for residential development.
EPS-PSB2	Land Between Over Lane and the B4055, Easter Compton	• Concern that Easter Compton is a small village, and lacks the necessary infrastructure to accommodate development – for example there is no local school. • There is a lack of employment opportunities in Easter Compton to accommodate an increase in population, making development unsustainable. • Development on the site will change the character of the quiet village and make it more urban. • Concern about the engineering challenge for the main sewer in the area.
EPS-PSB4	Land off Blackhorse Hill, Easter Compton	• Concern that Easter Compton is a small village, and lacks the necessary infrastructure to accommodate development – for example there is no local school. • There is a lack of employment opportunities in Easter Compton to accommodate an increase in population, making development unsustainable. • Development on the site will change the character of the quiet village and make it more urban. • If development takes place, a 50m buffer is requested to the adjacent Ancient Semi Natural Woodland.

EPS-PSB5	Land at The Paddock, Easter Compton	• Concern that Easter Compton is a small village, and lacks the necessary infrastructure to accommodate development – for example there is no local school.
EPS-PSB3	Land to the east of the B4055, Pilning Station	• Development of the site is not required, given the existence of empty commercial buildings nearby (including on Western Approach). • There is already an imbalance of employment and jobs in the North Fringe – providing more employment land in the vicinity will make this worse.
EPS-FC14	Woodlands Golf Course, Trench Lane, Almondsbury, (Woodlands Garden Village)	• Support for the site if the right infrastructure and transport links are provided. • Opposition to high-density development, although support for projects similar to Hortham Village, which include reserved green spaces and footpaths. • Development on the site will change the character of the village. • There is ancient woodland in the SE corner of the site, the boundary should be redrawn to exclude this. • The site was formerly used as a waste tip and is likely to be contaminated.
EPS-SV5	Land on the South Side of Gaunts Earthcott Lane	• Question whether the site is suitable for the quantum of development envisaged given the need to adopt a defensible new Green Belt boundary. • Development on the site will change the character of the village. • The site was formerly used as a waste tip and is likely to be contaminated.
EPS-SV7	Land off Gaunts Earthcott Lane	• Question whether the site is suitable for the quantum of development envisaged given the need to adopt a defensible new Green Belt boundary. • Development on the site will change the character of the village. • The site was formerly used as a waste tip and is likely to be contaminated.

Comments on development in the East Fringe

<u>General comments</u>

- In common with comments about development across South Gloucestershire as a whole, members of the public and Town and Parish Councils expressed a range of concerns around infrastructure constraints within the East Fringe and their implications for development – in terms of highways, public transport, education, healthcare and other services – as well as air quality.

- Comments from members of the public and Town and Parish Councils also objected to the principle of development in the Green Belt across the East Fringe – and resultant losses of green space, recreational facilities and impacts on the environment.
- There were a number of objections to development near to Webbs Heath SNCI, which could put the viability of the ancient common in jeopardy.
- Concern from both members of the public and the development industry that the EPS does not anticipate new jobs or additional services being created within the East Fringe to support new housing development. Comments on this from members of the public typically suggested fewer new homes as the solution, whereas developers suggested this meant more employment provision is required.
- There were views that the East Fringe is vulnerable to flooding, and is not a suitable location for development.
- Objections were raised to the area being described as an 'urban fringe', with respondents considering that this shows a lack of understanding of the area's character, which is actually far more rural and historical.
- Some comments did support development in the East Fringe, given its close employment and other functional links into Bristol and hence its role as a sustainable development location. Given this, some developers suggested that the North Fringe should accommodating larger amounts of development, as was the case in the previous Regional Spatial Strategy.

Specific comments on individual sites, additional to the general comments above, include:

EPS-BV12	The Sawmiils, Bath Road, Bridge Yate	• No specific comments beyond the general themes outlined above.
EPS-BV11	Homeapple Close	• No specific comments beyond the general themes outlined above.
EPS-HA1	Land at Castle Farm Road, Hanham	• The site includes a large area of woodland which is subject to a number of designations and tree protection orders. If it is developed, there should be a 50m buffer to the ancient woodland. • The site is close to a number of listed buildings, and its development will impact on the historic character of Hanham.
EPS-HA2	Land south of Abbots Road	• Members of the public understand that the site is unavailable for development. • The site includes priority habitat, an SSSI and Local Nature Reserve. If developed, there should be a 50m buffer to the ancient woodland.

		• Development of the site will lead to the loss of valued scenic views.
EPS-HA3	Land at Castle Inn Farm	• The site is in an active recreational use. • The site includes priority habitat, a SSSI and Local Nature Reserve. If developed, there should be a 50m buffer to the ancient woodland. • Development of the site will lead to the loss of valued scenic views. • In support, some respondents consider the site to be well-screened from wider open countryside and an appropriate location for development.
EPS-BV13	Land North of Lyde Green	• Development of the site risks the coalescence of Bristol with Yate, particularly given proximity of the site to Westerleigh, which will merge into Lyde Green. • Development will result in the general loss of Westerleigh and Lyde Green's historic character. • The site is at risk of contamination, and suffers from noise and air pollution, due to its location adjacent to the M4. • The site is at risk of flooding. • Proximity to the Westerleigh Fuel Depot and animal processing plant make this an inappropriate location for development. • Concern that development will necessitate the diversion of public rights of way through existing housing estates, disrupting existing residents. • Development should include a village centre from an early stage, that also includes specific infrastructure for healthcare and education. • The density of development proposed on the site should be reduced. • In support, development on the site will allow for the delivery of a regional science, technology and sports campus which supports the existing nearby science park.
EPS-EG2	Land at, Cossham Street, Mangotsfield	• Concern about safe access to the site due to the additional traffic. • The site has previously had permission refused for residential development.
EPS-EG1	Land at Shortwood	• The scale of development proposed is out of character with the small size of Shortwood.

EPS-BOC1	Land to the rear of Park Farm, Barry Road, Oldland Common	• Development will lead to urban sprawl, and a risk of merging between Bristol and Bath. • Concern that access to the site would rely on Barry Road (A4175), which is already congested during peak times.	
EPS-BV3	Land at, Shortwood	• No specific comments beyond the general themes outlined above.	
EPS-BV6	Land south of Shortwood Hill, Mangotsfield BS16 9PF	• The site is within a National Landscape (former Area of Outstanding Natural Beauty) • Development will result in the loss of valued views across the site.	
EPS-BV9	Lower Shortwood	• The site is within an air quality monitoring zone, meaning that development will have particularly significant air quality impacts. • The scale of development proposed is out of character with the small size of Shortwood. • Concern about Radon gas under Shortwood and Shortwood golf course.	
EPS-BV10	Glenfern and Land to East of Carsons Road	• Support for a small-scale increase in employment use on the site, subject to access being maintained to the Green Belt for recreational use, health and wellbeing of residents of nearby.	
EPS-BV12	Saw Mills, Bath Road, Bridgeyate	• Concern that access is limited to Bath Road (A4175), which is expected to see increased traffic due to the expansion of McBraida nearby. • Concern that the site is adjacent to a floodplain, with potential impacts on the high water table and waterlogged fields to the south, which are prone to winter flooding. • Concern about land promotion and availability.	
EPS-PW1	15 and 17a, London Road, Warmley	• Concern about the remain of a Roman road through Winfield Road site.	
EPS-BV14	Land north of A420 and south if Goose Green	• Concern that the access is onto London Road, which is busy, or otherwise onto a narrow country lane between Webbs Heath and Goose Green. • Support for the proposal of a new primary school on the site, however there also be additional secondary schools, local services and facilities to accommodate development.	

EPS-BOC2	Land at 12, The Park, Willsbridge BS30 6EE	• No specific comments beyond the general themes outlined above.
EPS-BOC3	Jarretts Garden Centre, Bath Road	• Support for the principle of development on the site, which is previously developed, and hence will not result in harm to the Green Belt. • Concern that too many homes are planned for the site, which will result in development that is too dense and harms the character of the area.

Comments on development in the Market Towns

General comments

- There was general support for the principle of development in the Market Towns, recognising that they generally benefit from existing infrastructure, and form relatively sustainable locations for development. Comments from members of the public and Town and Parish Councils requested that new development in the Market Towns helps to fund further investment in infrastructure, for example the provision of new primary healthcare capacity.
- Given the sustainability of the Market Towns, some developers considered that an insufficient number of sites are proposed for inclusion in the EPS – that they have capacity to grow, and should be accommodating larger amounts of development.
- Comments in support of development in the Market Towns also note that they are located beyond the Green Belt.
- There were some comments from members of the public expressing concern about overdevelopment in the Market Towns, noting that they have already been the locations for relatively large amounts of development in recent years. These suggested that new development should therefore be more restricted, particularly in areas of the towns that have recently grown.
- Few comments from Parishes expressing support for more development in Yate, Chipping Sodbury and Thornbury due to previous big investments in their high streets.

Specific comments on individual sites, additional to the general comments above, include:

EPS-THOR2	Land to west of Park Farm	• This site has limited opportunities for sustainable travel.
EPS-THOR3	Land west of B4061	• In combination with site THOR1, there is a risk of Alveston and Thornbury merging. • Development will result in unacceptable increases to traffic on the B4061.

		• The site is at the gateway of the town and adjacent to one of the oldest allotments in the country – this will harm the character of the town.
EPS-FC12	Land at Dyers Lane	• Development will have unacceptable issues in terms of congestion and air quality. • Development will increase the risk of flooding in the vicinity. • Concern that providing safe access would require the partial demolition of historic pennant stone walling between Dyers Lane and the garden of One Pool Farm.

Comments on development in the Rural Communities

General comments across all settlements

- In common with comments about development across South Gloucestershire as a whole, members of the public and Town and Parish Councils expressed a range of concerns around infrastructure constraints within Rural Communities and their implications for development – in terms of highways, public transport, education, healthcare and other services – as well as air quality.
- Comments from members of the public and Town and Parish Councils also objected to the principle of development on greenfield sites – both in the Green Belt and beyond it – and resultant losses of green space, recreational facilities and impacts on the environment.
- Similarly, comments expressed concerns about the impact that development in Rural Communities would have on their rural character and tranquillity, their historical character, and views across the countryside.
- Comments from developers suggested that the Rural Communities should be accommodating larger amounts of development – given their location beyond the Green Belt, and ability to provide for a balanced range of housing (such as self-build). There were specific objections to a lack of growth in Hambrook and Wickwar.

Specific comments on development in **Acton Turville**, additional to the general comments across all settlements, include:

- The need to consider school provision across both South Gloucestershire and neighbouring Wiltshire to the east.
- Concern at the particular lack of public transport provision in Acton Turville.
- For site EPS-CSCE2:
    - Concern about flooding, given existing issue adjacent to Railway Cottages and the railway line.
- For site EPS-CSCE5:

    - Concern that the boundary of the site extends into open countryside, beyond the area currently in an industrial and commercial use.
    - Concern that development will result in the demolition of historical buildings.
    - Queries about whether there will be housing available in the vicinity for employees on the site.
    - Access to the site is in a dangerous location on Littleton Drew Lane.
- For site EPS-CSCE4:
    - Concern about the provision of parking at the depot
    - Concern about the depot's contribution to the volume of traffic through the village.

<u>Specific comments on development in **Alveston**, additional to the general comments across all settlements, include:</u>

- Concern that development in the village will result in the eventual merger of Alveston with Thornbury.
- Concern that there is a lack of employment opportunities in Alveston to support new housing, leading to inevitable commuting and traffic, contrary to the aims of the EPS.
- Members of the public considered that the amount of development planned for the village is too much, and not proportionate to other parts of South Gloucestershire – however comments from developers considered the village suitable for growth.
- For site EPS-SV2:
    - Concern about the impacts of development on existing properties on Strode Common, in terms of overlooking and overshadowing.
    - In support, comments considered that this site has the best accessibility of any proposed for Alveston.
- For site EPS-SV6:
    - Concern that the number of dwellings proposed cannot be delivered, due to the number of trees and other boundary features that will need to be protected.
- For site EPS-SV11:
    - Concern that the number of dwellings proposed cannot be delivered, due to the number of trees and other boundary features that will need to be protected.
- For site EPS-SV12:
    - Ball strike issues need to be considered in relation to the adjacent cricket club. It would be unacceptable for development on the site to restrict the future use of the club.
- For site EPS-THOR1:
    - This site sits on the approach into the village from Thornbury, and will therefore change the character of the village.
    - In combination with site THOR3, there is a risk of Alveston and Thornbury merging.

- The provision of a bus stop to serve the site on Alveston Hill would have an unacceptable impact on highway safety. It is similarly not a safe location to provide access into the site.

There were no additional specific comments made on development in **Badminton**, or on site EPS-CSCE3.

Specific comments on development in **Charfield**, additional to the general comments across all settlements, include:

- There were a mixture of views on the delivery of a new railway station in Charfield – with some respondents being supportive of it, and the ability to therefore accommodate new development in the village. However, others expressed scepticism that the railway station will be delivered, or that it will have an acceptable level of service to encourage usage, and hence consider that there is not yet any case to justify new development in the village.
- Comments from developers suggested that the Local Plan needs to make clear how the Joint Strategic Plan Inspector's previous concerns around development in Charfield have now been overcome.
- Other comments also noted the importance of accompanying delivery of the station with active travel infrastructure across the village, in order to avoid issues with parking in the area around the station.
- Concern about negative impacts on Lower Woods Nature Reserve as a result of an increased local population.
- Concern that there is a lack of employment opportunities in Charfield to support new housing, leading to inevitable commuting and traffic.
- For site EPS-CHAR5 and EPS-CHAR6:
  - Concern that J14 of M5 could not accommodate the additional traffic.

Specific comments on development in **Coalpit Heath** on site EPS-FC1, additional to general comments across all settlements, include:

- Concerns that site EPS-FC1 is too large, and would not represent proportionate growth of the village.
- Support for the principle of development in Coalpit Heath, by virtue of its proximity to employment opportunities and transport.

Specific comments on development in **Cromhall**, additional to general comments across all settlements, include:

- Concerns that there is a lack of evidence in the Habitats Regulations Assessment in support of development in the village – further work should be carried out to ensure ecological connectivity and integration with Nature Recovery Networks.
- Members of the public considered that the small size of Cromhall and its lack of infrastructure mean that it is not an appropriate location for development, however comments from developers consider that more development should be proposed.
- Quarrying around Cromhall makes it a hazardous and inappropriate location for development.

No specific comments beyond the general themes above were made for sites EPS-CHAR1, EPS-CHAR2, EPS-CHAR3, EPS-CHAR4, EPS-CHAR7, EPS-CHAR8 and EPS-CHAR9.

Specific comments on development in **Engine Common**, additional to general comments across all settlements, include:

- Concerns around heritage assets across all sites being protected, particularly archaeological remains.
- For site EPS-FC5:
    - Concern around flood risk which affects the site.
    - Concern around the impacts on protected trees on the site.
- For site EPS-FC9:
    - Concern around flood risk which affects the site.

No specific comments beyond the general themes above were made for sites EPS-FC4 and EPS-FC7.

Specific comments on development in **Frampton Cotterell**, additional to general comments across all settlements, include:

- Concern that there is a lack of employment opportunities in Frampton Cotterell to support new housing, leading to inevitable commuting and traffic.
- In support, it was noted that the boundary of the settlement has not changed for 30 years, and this has been limiting sustainable development opportunities in the village.

No specific comments beyond the general themes above were made for site EPS-FC6.

Specific comments on development in **Hawkesbury Upton** on site EPS-CSCE1, additional to the general comments across all settlements, include:

- Support for development on the site, provided these include a majority of affordable homes that are available to local people.
- Support for the preservation of the existing settlement boundary, to protect the character of the village.

Specific comments on development in **Hortham**, additional to the general comments across all settlements, include:

- Concern at a lack of infrastructure and services in the village to support development.
- However, in support, some comments considered that Hortham is a sustainable settlement to expand.
- For site EPS-SV3:
    - Development on the site has previously been refused due to highway safety and access issues.
- For site EPS-SV10:

- Believed that the site is contaminated, and will be unsuitable for development.
- The site is used for sports pitches, and will need to be replaced.

Specific comments on development in **Marshfield**, additional to the general comments across all settlements, include:

- Concern at a lack of infrastructure and services in the village to support development, particularly public transport.
- The Parish Council recognise that Marshfield should not receive housing allocation through the Local Plan, however housing development should happen through CLT or Community-led Housing.

No specific comments beyond the general themes above were made for site EPS-BV5.

Specific comments on development in **Olveston**, additional to the general comments across all settlements, include:

- Concerns that development will compromise historic assets, and the historic character of the village.
- Concerns around a lack of burial provision within the village, with requests that the Council helps to ensure future provision.
- Comments from developers suppose the principle of growth in the village, considering it to be reasonably-sized and benefitting from a range of services and facilities.
- For site EPS-SV4:
  - Concerns around a lack of safe access, due to the road alongside being single-track with no room for widening. Junctions in the vicinity of the site are also dangerous with poor visibility, and cannot accommodate development.
  - Concerns that providing a secondary access into the primary school will create congestion and safety issues for children.
  - Development will harm the setting of the Grade II* listed church, and restrict views of it from outside the village, as well as causing wider harm to the conservation area.
  - Some respondents considered that there are other sites elsewhere in Olveston which would be preferable.

There were no additional specific comments made on development in **Pucklechurch**, or on site EPS-BV15.

Specific comments on development in **Rangeworthy**, additional to the general comments across all settlements, include:

- Concern around a lack of sewerage capacity within the village.
- Concern about highway safety.
- Concern about negative impacts on Lower Woods Nature Reserve as a result of an increased local population.
- For site EPS-FC2:

    - Comments considered the site to potentially be suitable but suggested that the number of dwellings should be reduced in order to avoid overdevelopment.
- For site EPS-FC3:
    - Concern that this site will have particularly significant impact for biodiversity, given its location adjacent to a wildlife site.
- For site EPS-FC8:
    - Comments considered the site to potentially be suitable but suggested that the number of dwellings should be reduced to avoid overdevelopment. The design should ensure that visibility of dwellings from the road is minimised.
- For site EPS-FC10:
    - Concern around impacts on residential amenity given the need to access through an existing housing estate on The Grove, as well as concerns around the safety of access given proximity to a children's playground.

No specific comments beyond the general themes above were made for site EPS-FC11.

Specific comments made on development in **Tytherington**, or on site EPS-FC13, include:

- Concern at the particular lack of public transport provision in Tytherington and Itchington.
- Concern at the road safety to use the Avon Cycle Way for commuting or accessing to education or other services.
- Concern at the local water system as it's out of date and with low pressure for exiting local residents

Specific comments on development in **Wick**, additional to the general comments across all settlements, include:

- Concern at the particular lack of public transport provision in Wick with a direct link to Bristol centre.
- The Parish request that the historical sites are protected within the settlement.
- Concern that all of the sites proposed are at a distance from the centre of the village, and from its services and facilities.
- For the same reason, concern that this means that the proposed sites will result in particular visual impact.
- For site EPS-BV1:
    - Concern that development in close proximity to a quarry lake is dangerous.
    - Ground water flooding issues exist in the vicinity of the site.
    - The northern part of the site is identified as a locally important habitat.
- For site EPS-BV4:
    - Concern about impacts on adjacent Grade II listed buildings.
- For site EPS-BV8:

- Concern about impacts on adjacent Grade II listed buildings.

No specific comments beyond the general themes above were made for site EPS-BV2.

Specific comments on development in **Winterbourne**, additional to the general comments across all settlements, include:

- Developers considered that the scale of growth envisaged in Winterbourne is appropriate, particularly given its lack of recent growth, and that it is a sustainable location.
- For site EPS-WIN1:
  - Because of its location, it will be difficult to provide safe access.
  - The site suffers from significant surface water flooding issues.
- For site EPS-WIN2:
  - The site is used as an overflow car park during events at the nearby rugby, football and gymnastics club – if this facility is lost there will be increased parking pressure on nearby residential roads which are already congested.
  - Development will result in the loss of a space used for recreation.
  - The site is an awkward shape, and development on it will feel crammed in with poor design.
  - Concern that the site suffers frequent flooding.
- For site EPS-WIN3:
  - The field was originally a market garden and should be preserved as an exemplar of sustainable agriculture.

Q8-10 Strategy Lenses: General comments

Summary of general comments to the three lenses (specific comments on each lens are set out below)

Need for Balance

- Many comments from developers consider that a more balanced approach is needed which takes elements from each of the three lenses, with none being suitable on their own. Examples include views that a more dispersed spread of homes across the district would be an appropriate strategy, views that Lens 1 would be appropriate if combined with significant investment in sustainable transport infrastructure, and similarly that an 'accessibility' blend of Lens 2 and 3 could be pursued.
- Other comments express a view that the preferred strategy exacerbates current commuting patterns and will not enable decarbonisation of transport. E.g. Severnside is the location with the highest number of jobs per resident, where more than

80% of employment land and only 3% of housing is proposed. Comments suggested that an imbalance in commuting could result in a loss of jobs from SGC.

- Some developers consider there to be an absence of a clear spatial strategy and lack of strategic planning. Several consider that meeting Bristol's need is already embedded within the strategy (i.e. the quantum of growth adjacent to the urban area is already three times higher than elsewhere in SGC).
- Views from some members of the public noted that none of the lenses are explicitly focused on providing greater levels of housing for older people.

Unclear link to site selection, and lack of alignment with Plan Objectives

- A number of responses consider that it is unclear how the lenses were arrived at, and why the lens-based approach was developed.
- Many responses from developers considered that there is insufficient evidence to justify the site selection process, nor has this been justified by the SA.

General concerns:

- Views were expressed by members of the public that a variety of different locations around South Gloucestershire are inherently incapable of supporting further development, due a range of infrastructure capacity issues.
- Developers promoting a range of sites not selected expressed concerns about a lack of clarity in the site selection process underlying both the selection of EPS sites and the definition of the lenses.

Q8 Strategy Lens: No Green Belt Loss

Do you have any comments on the No Green Belt Loss strategy lens?

Summary of comments

Comments on Individual Sites

- During the consultation a number of comments were received against the each of the lenses, commenting on potential alternative sites. These comments are not summarised here, however where relevant these have informed updates to our evidence in particular the Housing and Economic Land Availability Assessment and the Site Assessment Schedule which will be re-published to support the Local Plan spatial strategy. To view these please go to the Local Plan evidence base webpage here. Additionally, the individual comments received to this consultation are published in full here (A LOCAL PLAN CONSULTATION HUB WILL BE AVAILABLE FOR REG 19 CONSULTATION AND WILL CONTAIN ALL REPRESENTATIONS RECIEVED TO DATE FOR THE 4 PHASES OF REGULATION 18 CONSULTATION).

Support for the No Green Belt Loss Lens

- Many respondents, particularly members of the public, expressed opposition to Green Belt development – and therefore support this approach. This Lens will protect Green Belt land, maintain gaps between settlements, and prevent the outward urban sprawl of Bristol.
- Comments in support of the Lens note its alignment with national planning policy, and the West of England Mayoral Combined Authority's aspirations for Green Belt and the environment. Green Belt land should only be released in very special circumstances as per the National Planning Policy Framework.
- Green Belt land is inherently biodiverse, and its loss could endanger wildlife and natural habitats (some of which are protected), which is irreversible, creates environmental issues and contributes to climate change.
- Green Belt land is an important amenity for local residents and should be retained for recreation and access to the countryside, in the interests of residents' health and wellbeing.
- Green Belt land plays a role in maintaining the character and attractiveness of the countryside and adjoining towns and villages, so should not be developed.
- Green Belt land should be retained for food production, ensuring food security for the country.
- A number of comments express a view that sites are available for development outside the Green Belt and should be prioritised before Green Belt land is released – an approach that this Lens is consistent with. Green Belt release would therefore be inappropriate.

- This Lens would encourage reuse of brownfield land, bringing back into use empty buildings, and development at higher densities.
- Green belt sites are inherently situated further from employment and other services, which would encourage private travel and increase emissions. This Lens therefore aligns with Council's climate policy.
- It was suggested that settlements beyond the Green Belt (Thornbury, Charfield, Yate, etc) have high-levels of employment self-containment, with relatively low levels of commuting to Bristol, hence no need to build within the Green Belt to meet housing needs.
- Whilst many developers objected to this Lens on the basis that it would result in no development on Green Belt sites, some developers promoting sites beyond the Green Belt were in favour of it.

Objection to the No Green Belt Loss Lens

- Green Belt release is essential if housing targets are going to be met, and an approach which resists this outright in the absence of other evidence (such as a Green Belt Review) is flawed.
- Choosing this Lens would still result in greenfield development, just not within the Green Belt – with it 'leapfrogging' to locations further from Bristol. This Lens would therefore disproportionately affect communities outside of the Green Belt, in locations where there is less infrastructure to support development.
- Green Belt land does not have inherent environmental benefits. It can for example be contaminated from previous agricultural practices, and its sustainable development can be more environmentally beneficial if the right approaches are followed.
- This Lens would result in unsustainable travel patterns, with homes located a long way from employment locations (primarily within Bristol and the Urban Edge). It was suggested that this is already an issue, given a recent lack of Green Belt development in sustainable locations in South Gloucestershire, and this Lens would make the situation worse.
- Not undertaking any development in the Green Belt is likely to preclude opportunities to provide growth in major new developments – instead resulting in growth in lots of smaller communities with infrastructure that is already overstretched.

General and neutral comments on the No Green Belt Loss Lens

- Views were expressed by a variety of respondents that where development in the Green Belt is unavoidable it should be focussed on the urban edge, or near to existing urban centres and villages, transport corridors or workplaces.
- Some members of the public expressed a view that where Green Belt development does come forward, it should consist of small, thoughtfully planned schemes that fit in with local character, in order to reduce impacts.
- A range of respondents expressed the view that the key determining factor in where development is located should be the location and capacity of infrastructure, regardless of Green Belt designation.

- Some members of the public considered that if Green Belt land has to be lost for development, other areas of Green Belt must still be protected and alternative land newly designated as Green Belt.

Q9 Strategy Lens: Urban Edge

Do you have any comments on the Urban Edge strategy lens?

Summary of comments

Comments on Individual Sites

- During the consultation a number of comments were received against each of the lenses, commenting on potential alternative sites. These comments are not summarised here, however where relevant these have informed updates to our evidence in particular the Housing and Economic Land Availability Assessment and the Site Assessment Schedule which will be re-published to support the Local Plan spatial strategy. To view these please go to the Local Plan evidence base webpage here. Additionally, the individual comments received to this consultation are published in full here. (a local plan consultation hub will be available for Reg.19 consultation and will contain all representations received to date for the 4 phases of regulation 18 consultation).

Support for the Urban Edge Lens

- A number of responses from developers supported the principle of locating homes and jobs adjacent to the urban edge, given the potential to reduce impacts on climate change and support the decarbonisation of travel.
- Similarly, many responses from developers consider that affordable housing and employment is most needed adjacent to the edge of Bristol, irrespective of Green Belt constraints. Pursuing this Lens would bring high value growth to the local economy, and best balance the provision of homes and jobs.

Objection to the Urban Edge Lens

- Many objections from members of the public related to the loss of Green Belt land inherent in this Lens – that this is contrary to national planning policy, and that it is irreversible and sets a precedent for future Green Belt loss.

- Similarly to the comments in support of Lens 1 (with no Green Belt loss), objections to Lens 2 set out concerns about the loss of biodiversity, loss of amenity and recreation space, erosion of local character and impacts on food security considered to be inherent as a result of development in the Green Belt.
- Respondents also considered that this Lens would be negatively and disproportionately impact settlements within the urban edge. Overdevelopment and overcrowding would lead to a reduced quality of life for existing residents. Similarly, there were concerns that this Lens would not allow for proportionate growth in locations further from Bristol.
- Growth under this Lens would surround conservation areas in the urban edge with development, impacting the heritage and character of the area.
- It was considered that this lens is unsustainable as it would further congest the local highway network and encourage car use given the lack of public transport provision within the Urban Edge. Similarly, this Lens would worsen air and noise pollution from an increase of cars, and exacerbate existing road safety issues.
- It was considered that this Lens conflicts with the 'green corridor map' provided, and contradicts the Council's aims regarding the climate and nature emergency.
- There were concerns that significant growth in the Urban Edge will create unsustainable communities and have negative impacts on existing infrastructure and essential services that are already under strain, such as schools, doctors surgeries, dentists, and roads.
- This Lens would discourage the reuse of brownfield land, the bringing back into use of empty buildings, and development at higher densities.
- This Lens will oversaturate the housing market in one specific part of South Gloucestershire, reducing choice for future residents, and therefore not do enough to address local needs.
- Concerns were raised that locations within the Urban Edge are at high risk of flooding, and that this Lens may therefore worsen existing flooding issues.

<u>General and neutral comments on the Urban Edge Lens</u>

- Some comments from developers suggest that this Lens still does not go far enough in allocating development on the edge of Bristol – and that even more development should be considered in this location under this Lens.
- Specific concerns were raised that the presence of the existing helicopter base and its implications for development have not been considered, posing potential safety risks for future residents.
- Green Belt land on the Urban Edge could alternatively be allocated for community uses such as market gardens, green energy, allotments, garden centres, woodlands, and conservation areas.
- Comments from developers challenged the assumption that this Lens would inherently largely comprise large sites which take a long time to deliver – considering that a number of small and medium sized sites could also be allocated in the Urban Edge.

Q10 Strategy Lens: Transport Corridors and Hubs

Do you have any comments on the Transport Corridors and Hubs strategy lens?

Summary of comments

Comments on Individual Sites

- During the consultation a number of comments were received against each of the lenses, commenting on potential alternative sites. These comments are not summarised here, however, where relevant these have informed updates to our evidence in particular the Housing and Economic Land Availability Assessment and the Site Assessment Schedule which will be re-published to support the Local Plan spatial strategy. To view these please go to the Local Plan evidence base webpage here. Additionally, the individual comments received to this consultation are published in full here. (a local plan consultation hub will be available for Reg.19 consultation and will contain all representations received to date for the 4 phases of regulation 18 consultation).

Support for the Transport Corridors and Hubs Lens

- This Lens was felt by many respondents to be a sustainable approach to development – ensuring that development is close to transport infrastructure, rather than requiring new transport infrastructure to be provided.
- A range of respondents expressed conditional support for the Lens – subject to it being accompanied by appropriate improvements, funded by developers, to public and active transport infrastructure. This includes highways, buses, rail, and active travel. This reflects general views that current public transport services and active travel infrastructure across South Gloucestershire are not adequate.
- Similarly, there were a range of views that suggested this Lens could only be supported if it was accompanied by measures that ensure a reduction in private car use – for sustainability reasons, and to ensure congestion is not made worse.

Objection to the Transport Corridors and Hubs Lens

- Comments from members of the public noted that transport corridors are not equally distributed around South Gloucestershire, and were therefore concerned that this Lens will not result in a fair distribution of development.
- Because of the nature of this Lens, concerns were expressed around the impacts of concentrating development on both the Strategic Road Network and local road network – and impacts on highway safety, congestion and air quality.

- Lens would not encourage reuse of brownfield land, bringing back into use empty buildings, or development at higher densities.
- Comments from a range of respondents noted that transport corridors do not necessarily correlate with sites that are available and sustainable locations for development. Many consider that growth should be focussed on town and local centres which have more infrastructure to facilitate growth, e.g. Yate and Thornbury – or on the Urban Edge.
- Some comments suggested that not all transport corridors should be considered equally within this Lens – not all are of the same quality, with different levels of public transport provision along them.
- It was considered that this Lens does not propose to connect new housing to locations of employment – with a lack of local employment sites proposed along transport corridors that would make this Lens sustainable. This would lead to an increase in commuter traffic and create imbalances.
- There were concerns that this Lens's focus on radial transport corridors would result in a loss of separation and distinctiveness between settlements – leading to ribbon development, infill and sprawl.
- Whilst development in the Green Belt may be less of an inherent feature of Lens 3 compared to Lens 2, similar concerns were expressed about the loss of biodiversity, loss of amenity and recreation space, erosion of local character and impacts on food security considered to result from development in the Green Belt.

<u>General and neutral comments on the Transport Corridors and Hubs lens</u>

- It was noted that the principle of the Lens reflects transport corridors being relatively more sustainable locations for development – however, comments noted that some corridors are less sustainable, some have limited/poor active travel provision, and public transport provision within corridors may not necessarily be permanent.
- Some comments considered it unclear whether the cumulative impact on transport networks (both within South Gloucestershire and within neighbouring authorities) had been considered when formulating this Lens – for example at M5 Junction 14.

Q11 Planning for Gypsies Travellers and Travelling Showpeople

Do you agree with the proposed approach?

Summary of comments

Members of the public

- There is a need to understand the needs of Travelling communities, some highlighting that should include those of 'van dwellers'.
- The historic situation in South Gloucestershire remains, not through lack of political will.
- There was recognition that the Council should meet the needs of its Travelling communities through the Local Plan, and some support for the approach proposed.
- Some support for the safeguarding of existing, authorised sites, recognising that to give up existing sites will only make the task of identifying new sites bigger.
- Some members of the public disagreed with the use of Green Belt land for Gypsy/ Traveller provision, and some did not understand the reason for proposing the removal of sites from the Green Belt.
- There was some concern that Gypsy/ Traveller sites that are removed from the Green Belt will be redeveloped for other uses, as has been case with land safeguarded for other uses (e.g. employment) in the past.
- Some support for intensification of existing authorised sites, albeit some suggested this approach should not be allowed on sites in areas of conservation interest or GI enhancements.
- Some considered that delivery of new provision through the strategic development sites is the most robust option.
- Some members of the public suggested the need for SGC and partners to work together to ensure sites are properly managed, including through the use of conditions/ agreements, and taking enforcement action where necessary.
- There are issues with (and after) unauthorised encampments, transit (or similar) provision should be considered.
- Travellers should be allowed to continue using common land as they have done for centuries.
- There were some individual comments relating to specific existing authorised sites.
- Some members of the public felt that it was hard to comment fully, as the draft policy did not include details on sites.

Local Councillor

- The delivery of sites through the speculative application process is unacceptable, and the result of major and long-term failure of SGC to deliver through the plan-led system. The difficulty facing SGC should not be underestimated, but the political commitment is there.

Town and Parish Councils

- There was recognition that the Council should meet the needs of its Travelling communities through the Local Plan, with some recognising that the identification of new sites must be a priority.
- Some support for safeguarding existing authorised sites, given some of the sites are in the GB which limits the time of stay.
- Some support for proposal to remove the sites from the Green Belt, provided that adequate provisions are put in place to ensure that the sites are safeguarded.
- Some support for exploring the potential of land already owned by the travelling community for new sites for allocation through the Local Plan.
- Some highlighted concerns that the approach proposed will encourage the practice of buying up or acquiring private land in the Green Belt (if restrictions are removed) which will allow the development of unplanned sites following successful claims of need due to the overall lack of provision.
- Some town and parish councils felt that it was hard to comment fully, as the draft policy did not include details on sites to meet identified needs.
- Some recognition that Travelling Showpeople have long established bases in South Gloucestershire, along with educational arrangements. Other traditional travellers are far less tolerated, and there is real need to engage with these groups to discover what their needs are. There are a growing number of "van dwellers" because of the restriction in the supply of housing, and increase in contract working (entertainment, construction, and IT contract working for example).
- Some town and parish councils considered that the Council should seek to identify a site for transit/ stopping provision.
- There were comments from some individual T/PCs, relating to specific existing authorised sites within their respective administrative areas.

Neighbouring authority

- Stroud DC flagged that they are considering a modification at EiP to incorporate meeting the identified needs of bargees and boat dwellers.
- Wiltshire note the accommodation need identified for travellers, including travelling showpeople, and the more detailed results in terms of private provision and socially rented pitches for gypsies needed for travellers. Welcome the approach to meeting

needs by way of site intensification and provision of new sites, including the intention to marshal land owned by South Gloucestershire Council, which is similar to the approach Wiltshire Council is following.

Q12 Planning for Renewable Energy

Do you have any comments on the areas proposed for wind safeguarding?

Summary of comments

- There was recognition that the Council should safeguard areas to protect the potential for wind development to come forward, particularly in view of the Council's declaration of a Climate Emergency in 2019.

PWSA1
- Proposed area is inappropriate as a large solar farm has been consented on a site within this area.
- Proposal would result in visual pollution across the Severn Vale.
- PWSA is located immediately adjacent to the Severn Estuary Special Protection Area/Special Area of Conservation/RAMSAR and, as such, site-specific Habitats Regulations Assessment is likely to be required for any proposals that come forward.

PWSA2
- A proposal for a wind turbine was rejected at appeal, and the Inspector’s findings at that time remain valid.
- Proposal would result in visual and noise pollution across the local area.

PWSA3
- Oppose the safeguarding of the area for wind energy due to the potential adverse effect on wildlife, public access to footpaths in the area and enjoyment of the countryside, as well as the detrimental impact on views over to the Severn Estuary from Almondsbury.
- PWSA is within strategic GI Corridor A.
- Area is made up of productive farmland and should be protected for use for food production.

PWSA4

- Some disappointment that the only technology under consideration within the document is wind – solar and biofuel are also valid renewable energy resources.
- Grade I Listed Horton Court is located to the west of the area, siting within the area in relation to this asset and its setting should be considered.
- Area is located within the Cotswolds National Landscape (Area of Outstanding Natural Beauty).

PWSA5

- Some concerns regarding the impact of noise and vibration, flicker, pulsatile pressure waves and the effects associated with wind turbine syndrome, particularly in an area which is affected by noise pollution from the M4.
- Some disappointment that the only technology under consideration within the document is wind – solar and biofuel are also valid renewable energy resources.
- Grade I listed Horton Court is located to the west of the area, siting within the area in relation to this asset and its setting should be considered.
- Area is located within the Cotswolds National Landscape (Area of Outstanding Natural Beauty) and will impact on visually important hillsides.

PWSA6

- Area is within an area of prime agricultural land.
- Some concerns regarding the impact of noise and pulsatile pressure waves.
- Some disappointment that the only technology under consideration within the document is wind – solar and biofuel are also valid renewable energy resources.
- Area is located within the Cotswolds National Landscape (Area of Outstanding Natural Beauty).

PWSA7

- This location could provide significant and unique benefits linked with the old quarry where water could be pumped from one pit to another using wind turbines.
- Area is made up of productive farmland and should be protected for use for food production.

PWSA8
- Some disappointment that the only technology under consideration within the document is wind – solar and biofuel are also valid renewable energy resources.
- Grade I Listed Badminton Court is located to the east of the site, siting within the area in relation to this asset and its setting should be considered.
- Area is in the Cotswolds National Landscape.

PWSA9
- Area is within an area of prime agricultural land.
- Some concerns regarding the impact of noise and vibration, flicker, pulsatile pressure waves and the effects associated with wind turbine syndrome, particularly in an area which is affected by noise pollution from the M4.
- Area is in the Cotswolds National Landscape.

PWSA10 (10 supported, 8 objected, 2 maybe)
- Some concerns regarding the impact of noise and vibration, flicker, pulsatile pressure waves and the effects associated with wind turbine syndrome, particularly in an area which is affected by noise pollution from the M4.
- Some concerns about the potential impacts on wildlife in the area, particularly birds and bats.
- Area is located close to West Littleton, and within the Cotswolds National Landscape and will impact on visually important hillsides.
- Rushmead Farm, east of PWSA10, should be safeguarded as it has potential for wind energy development.

PWSA11 (10 supported, 1 objected, 4 maybe)
- Some disappointment that the only technology under consideration within the document is wind – solar and biofuel are also valid renewable energy resources.
- Area is located within a narrow area of the Green Belt and will impact on visually important hillsides.
- Support safeguarding of land, so long as it is not at the detriment of agricultural land.

Q13 Minerals

Do you have any comments on sites proposed for minerals allocation?

Summary of comments

- There was recognition that minerals can only be extracted where they are found, and that restoration plans are put in place for once the resource has been worked.

Cromhall Quarry

- Some concern regarding existing HGV movements in the area, and that this will worsen with the reopening of quarrying operations in the area.
- The area shown on the map should include the water body as there are permitted reserves below the water level within this area.
- The quarry's existing use as a recreational facility (swimming and diving) should be retained.

Tytherington Quarry extension

- Some concern regarding existing HGV movements in the area, and that this will worsen with the proposed extension of the quarry.
- Further extraction should only be allowed if is transported from site by rail.
- The aftercare proposals are an opportunity to improve the environmental/green Infrastructure gains.
- More use of recycled aggregates should be prioritised together with obtaining more information on process and quantities released from this source.
- SGC should make an allocation for the extraction of brickmaking clay as the clay in the Severn levels is of brick making quality.

Wickwar Quary extension

- Following a Geotechnical Assessment (GA) a 3metre width safety bench has been recommended along the eastern quarry wall at 10m depth intervals. The introduction of the safety benches reduces the permitted limestone reserves at Wickwar Quarry North from 17.40Mt to 14.211Mt. The anticipated life span of the quarry has reduced to 12 years, with exhaustion of the permitted reserves c. 2036. With the reduction in the permitted reserves, this brings forward the date when planning permission needs to be secured for the Wickwar Quarry Northwest Extension. To ensure continuity of supply of high-quality limestone into the nearby markets, planning permission will need to be in place c. 2031.

Q14 Strategic Green Infrastructure Corridors, Strategic Viewpoints and Visually Important Hillsides

14a. Do you support the designation of the proposed:

1. **Green Infrastructure corridors, or Network**
2. **Strategic Viewpoints**
3. **Visually Important Hillsides?**

Summary of comments

GI Boundaries and Audit Report

- Respondents included parish councils, developers and land promoters, statutory consultees and members of the public.
- Further explanation was required regarding the relationship of the GI corridors to the lager settlement and allocated development sites.
- SGC internal review noted that the revised Lower Almondsbury Conservation Area boundary needed to be reflected on the mapping and described in the report; also, that the description of the MCA LNRS required update in the report.
- Localised adjustments were proposed to the corridor network in the vicinity of Charfield, Hanham, Harris barton and Tortworth Park.
- Areas of local GI importance were promoted by respondents, but were not included if these did not meet the strategic GI criteria.

14b. Strategic Viewpoints

Summary of comments

Strategic Viewpoints (LCA SPD Annex 2 update)

- Respondents included parish councils, developers and land promoters, statutory consultees and members of the public.
- Additional viewpoint locations were presented by respondents around Winterbounre, Avon Valley, Tockington, Tortworth, Falfield and Pucklechurch; these were assessed against the strategic viewpoint criteria and an additional SVP at Winterbourne has been included; the remaining views have been recorded as being of local importance in LCA SPD Annex 2.

14c. Visually Important Hillsides
Summary of comments Visually Important Hillsides (LCA SPD Annex 1 update) • Respondents included parish councils, developers and land promoters, statutory consultees and members of the public. • Additional hillside formations were presented by respondents around, Winterbourne, Aust, and to the west of the Severn Ridges; these have been included in the updated version of LCA SPD Annex 1 where they met the criteria for visually important hillsides (VIH). • It was highlighted that in some locations that the footprint of the VIH appeared incorrect in terms of its relationship to the underlying OS contours; the boundary of the VIHs was reviewed to ensure they related to the more closely spaced contours which correlated with where the VIH appeared most prominent in views across the landscape. • It was argued that Oldland Ridge should be shown as two separate landforms either side of the Boyd Valley.

Q15 New Local Plan Policy Framework – Approach to Adopted Policies
Do you have any comments on the proposed range of new Local Plan Policies?

Summary of comments
 	
• There was some support from all stakeholders for the updated range of policies which respond to changes in national planning policy
• Members of the public supported policies on provision of housing suitable for older people and climate change and renewable energy generation policies, which they felt could go further.
• There were concerns raised by members of the public about the consultation process which was confusing and difficult to navigate.
• Members of the public and parish councils commented on policies that could be added to the plan;
  ○ A new policy on rewilding, identification of specific sites for nature recovery, plans to improve public access to nature and a commitment to using citizen science to inform planning is based on up-to-date data.
  ○ New policy on “amenity net gain”

  - New policy on protecting Best and most Versatile Agricultural Land
  - There should be a strategic green buffer to the north of Thornbury
  - Why has sustainable development policy been deleted it should be retained?
- The NHS requested an additional policy on health and wellbeing
- The Cotswold National Landscape Board requested a specific policy relating to the Cotswold National Landscape
- The Forest of Avon and the National Trust would like stronger policy on nature recovery and identification of habitat creation sites
- Support from representatives of the development industry for minimum room sizes, older persons homes, climate change policies and carrying over allocations from previous plans.

Q16 Climate Change Mitigation, Adaptation, and Resilience - Policy

Do you agree with our proposed policy approach?

Summary of comments

- Members of the public put forward comments on a wide range of issues with the main ones summarised below.
  - Water use - The importance of considering water was highlighted and some respondents set out it was not considered enough in the policy. Various specific measures were put forward.
  - Renewable Technologies and Design - Various comments relating to the need for housing to exceed national targets, have a fabric first approach and incorporate renewable and low carbon technologies.
  - Wildlife and nature; green and blue space and agricultural land - The importance of wildlife and biodiversity and the need for more consideration in the policy and plan were highlighted. Other areas of comment included the need to protect green spaces, protect soil, and the need for a joined-up approach for issue. Specific measures such as bird boxes, biodiversity corridors, green space and areas for food growth were put forward. It was highlighted as important to preserve agricultural land.
  - Flooding - Issues raised in particular comments on not building on flood plains/flood risk areas and comments highlighting how climate will lead to increased flooding.
  - Transport and Air Quality - Various respondents highlighted the need to sort out car emissions/ air quality due to traffic and to not build in areas of poor air quality or where existing infrastructure needs improvement. Better public transport, reducing commuting and the location of development were also areas of comment.

- Overall policy issues and policy wording: These were grouped into themes with many comments on each theme. Key themes include; not building on the Green Belt; inconsistent/contradictory plan policies; more detailed policy wording needed; don't build-any building is incompatible with climate change; and general agreement with policy-climate change is important.

- Developers were supportive of the principle but were concerned with the detail, including the requirements for data (in particular on adaptation) and viability, which was raised numerous times. Various developers considered the policy conflicted with the PPG and 2015 ministerial statement and/or should be left to building regulations or the future homes standard. The policy was considered too long. Further guidance on implementation was highlighted as needed. Concerns were raised with meeting BREEAM. One was strongly supportive of higher standards.
- Parish councils and local councillors were overall supportive. There were some concerns and these broadly relate to wording, green space, the importance of infrastructure and concern with Green Belt development and traffic.
- Community groups were generally supportive and raised similar issue to members of the public. Registered charities were generally supportive and raised specific concerns in relation to their specific areas, including more emphasis on trees and nature-based solutions. Natural England highlighted the policy should go further on onsite renewables and Green Infrastructure, including sustainable water management.

Q17 Economy and Jobs- Policy

Do you agree with our proposed policy approach?

Summary of comments

Members of the public, parish councils and ward members

- Support for building houses where jobs / economic activity are located to reduce commuting, use of private cars and promote active travel. Others thought that the argument that jobs and homes should be balanced in each area is not justified. People do not want to live where they work and will still travel to work by car.
- Support safeguarding in the North and East Fringes.
- Provision for local jobs should be made alongside any significant new housing development to minimise traffic congestion and maximise active travel opportunities.
- Objection to create 25,000 jobs when there are 12,000 job vacancies in SGC.

- Disagree with number of new homes in SGC as there is not enough employment in the area.
- Disagree with strategy for Bristol East Fringe it is a residential area and not attractive to business. There is no coherent strategy or evidence this will work more research is needed.
- Comments about type of employment industries – more diversity, more mixed use, appropriate locations for distribution uses, promote green technology industries.
- This policy does not protect all employment providers or smaller employment sites including in Winterbourne.
- Concerns about the type and quantity of jobs in Yate and impact of recent developments. Some support for reuse of Stover Road for residential or mixed use due to its proximity to the station.
- Object to any safeguarding in Siston, Doynton and Wick.
- South Gloucestershire is meeting Bristol's employment land needs as businesses move out of the centre of Bristol.
- Concern that new employment allocations will change to residential in time.

Developer, land agent or site promoter

- General support for strategy on economic development and jobs and seeking to adequately meet both quantitative and qualitative requirements. However, some felt that we should be planning for more job growth based on past trends.
- Plan should recognise the impact of not providing enough housing on economic growth and productivity.
- Support strategy for East Fringe and new employment land allocations in this location.
- The wording is ambiguous, terms "economic development led" and "non-economic led" need to be clarified.
- Inclusion of local skills criteria was supported by some, but others objected due to unknown impact on viability. A number of comments on the justification and effectiveness of Criterion 6 including that "facilitate access" needs to be clarified.
- Would prefer more flexibility and a wider range of uses which would be acceptable
- Object to main town centre uses being included as already covered by separate policies.
- The number and quality of jobs should be a factor as well as the size of the area where mixed use schemes are allowed.
- Support for broad definition of economic development and aim to optimise density.
- Comments in relation to specific sites by promoters.
- National Trust – would like to see acknowledgement of the tourism and visitor economy, including in rural areas.

Q18. Town Centres- Policy

Do you have any comments on the draft Town Centres policy?

Summary of comments

Members of the public, Parish & Town Councils

- Retail and town centres are in decline and need to be reimagined with a focus on a better variety of shops, uses such as community buildings and healthcare as well as public realm and green space. There is no strategy for attracting new uses.
- Some felt that there is a need to prioritise pedestrianisation, accessibility for those with limited mobility and better public transport others wanted improvements to vehicle access and car parking near to shops.
- Should prioritise strategies to utilise vacant buildings and prioritise existing centres before creating new retail developments
- Support for housing within town centres on upper floors to increase footfall.
- Many felt that centres provided in recent housing developments were inadequate.
- Retaining character of existing historic centres is very important.
- Yate – Members of the public expressed concerns about the range of shops and support for extending the centre as long as parking and accessibility provided to support this. Parish councils supported the designation of Yate Town Centre but felt big improvements for active travel, more flexibility on uses and higher density development is needed.
- Thornbury – concerns about the current range of shops and impact of High Street works. Need new shops to serve new developments on the edge of the town.
- Kingswood – Needs regeneration and pedestrianisation. Heritage buildings need to be protected.
- Emersons Green – query whether it should be classed as a town centre
- Winterbourne – Members of the public and Parish Council wanted additional local shops at Park Avenue and Bradley Avenue should be included as local centres

Local Councillors

- Concern about the identification of a new local centre at Brabazon due to the impact on the other 4 local centres.

Developer, promotor or land agent

- Site promotor in Staple Hill objected to the boundary revisions of the Town Centre.

- Cribbs Mall Objection to the evidence base and lack of additional retail allocation at the Mall or designation as a Town Centre especially in light of the Brabazon development. Also wanted updated guidance on out of centre development. Together this undermines the viability of the Mall. Would like a positive policy allocation for the Mall which recognises its important economic and retail role.
- Yate Shopping Centre Object to the extent of the town centre boundary which will prevent diversification, including residential, in the outer area. Support change of use to upper floors. Clarification on parking policy is required.
- Gallagher Retail Park Longwell Green – owners would like to be designated local centre.
- Brabazon YTL – welcomes addition of Local Centre at Brabazon.

Q19 Affordable Homes- Policy

Do you agree with our proposed policy approach?

Summary of comments

- There is considerable support for the policy in principle from all types of respondents including for the 35% requirement. There is some support for 40% and feedback that 35% is too low. There is also a view, mainly from developers and site promoters, that 40% is too high.
- There is specific support for the policy objective to reduce the number in the private rented sector relying on benefits to afford their housing costs by 25% from housing association partners and some members of the public.
- There were many responses from developers and site promoters that a plan-wide viability assessment must be provided to justify the Affordable Housing requirements. This was always the intention and is now in place.
- There were similarly many responses that it was unclear where the requirement for 40% Affordable Housing would apply which would lead to viability assessments on a site-by-site basis and slow down delivery. The policy requirements have been clarified following receipt of the plan-wide viability assessment.
- There is a view from a specialist provider of housing for older people that the Council should set a separate % Affordable Housing requirement for specialist housing for older people if the evidence shows that viability is different. Following receipt of the plan-wide viability assessment, the requirement for Affordable Homes on Age-Friendly housing developments has been set at a minimum of 20
- There is a view from some promoters that the Local Housing Needs Assessment understates Affordable Housing need.

- There is some scepticism that the Affordable Housing target is deliverable and that the overall housing target should be increased.
- Some developers said that for the policy to be NPPF-compliant there should be a requirement for First Homes. Housing association partners, Parish Councils and some members of the public generally support the proposed Affordable Housing tenure focus set out in the policy.
- While Parish Councils are generally supportive of the policy, the majority wanted Affordable Homes in rural villages restricted to those with a local connection, also supported by some members of the public The policy has been amended on this basis.
- Some Parish Councils, members of the public and a housing association partner want to see a better offer for older people who want to downsize or 'right-size'.
- The NHS want to see the need for Affordable Housing for NHS staff factored into needs assessments and site selection and allocation policies taking that need into account. The LHNA does already take the need of NHS staff into account, but it is not identified separately in the study.

Q20 Accommodation for Gypsies and Travellers- Policy

Do you agree with our proposed policy approach?

Summary of comments

Members of the public

- There was recognition that the Council should meet the needs of its Travelling communities through the Local Plan, although some respondents did not understand or agree with the need to do so.
- Some members of the public disagreed with the use of Green Belt land for Gypsy/ Traveller provision.
- There was some concern that Gypsy/ Traveller sites that are removed from the Green Belt will be redeveloped for other uses, as has been case with land safeguarded for other uses (e.g. employment) in the past.
- Some members of the public considered that brownfield land should be utilised for new Gypsy/ Traveller provision.
- Some members of the public suggested the need for SGC and partners to work together to ensure sites are properly managed, including through the use of conditions/ agreements, and taking enforcement action where necessary.
- Some members of the public felt that it was hard to comment fully, as the draft policy did not include details on sites.

Statutory body

- Natural England suggested the inclusion of additional criteria to ensure that sites should not have significant impacts on: biodiversity and ecological networks, protected landscapes (CNL), geodiversity or soils. An additional criterion relating to GI on site, and consideration of the impact on the wider GI network.

Town and Parish Councils

- There was some support for the policy approach proposed, and the need to address the accommodation needs of Gypsies/ Travellers
- Some town and parish councils disagreed with the use of Green Belt land for Gypsy/ Traveller provision.
- Some town and parish councils were concerned with the potential for sites to come forward in open countryside.
- Some town and parish councils felt that it was hard to comment fully, as the draft policy did not include details on sites.
- Some recognition of the need to engage with the travelling community to understand their needs.
- Some town and parish councils considered that the Council should seek to identify a site for transit/ stopping provision.

Q21 Accommodation for Travelling Showpeople- Policy

Do you agree with our proposed policy approach?

Summary of comments

Members of the public

- There was recognition that the Council should meet the needs of its Travelling communities through the Local Plan, although some respondents did not understand or agree with the need to do so.
- Some members of the public disagreed with the use of Green Belt land for provision for Travelling Showpeople
- Some members of the public considered that brownfield land should be utilised for provision for Travelling Showpeople.
- Some members of the public suggested the need for SGC and partners to work together to ensure sites are properly managed.
- Some members of the public felt that it was hard to comment fully, as the draft policy did not include details on sites.

Statutory body

- Natural England suggested the inclusion of additional criteria to ensure that sites should not have significant impacts on: biodiversity and ecological networks, protected landscapes (CNL), geodiversity or soils. An additional criterion relating to GI on site, and consideration of the impact on the wider GI network.

Town and Parish Councils

- There was some support for the policy approach proposed, and the need to address the accommodation needs of Gypsies/ Travellers
- Some recognition of the need to engage with the travelling community to understand their needs.
- Some town and parish councils felt that it was hard to comment fully, as the draft policy did not include details on sites.

Q22 Mineral working and restoration- Policy

Do you agree with our proposed policy approach?

Summary of comments

Members of the public

- Some concern regarding existing HGV movements in the area, and that this will worsen with the reopening of quarrying operations in the area. More use should be made of transport by rail where opportunities exist.
- Restoration of worked quarries is of central importance, and the opportunities they provide should be seized.
- The policy should be strengthened in respect of reuse/ recycling of aggregates.
- The current model of extraction of primary materials is not sustainable, and greater use should be made of secondary and recycled aggregates.
- There are minerals in the ground that have not been considered, including celestite, spar and clay. Once these areas are built on the resource is gone.
- The Local Plan should include a policy that protects the mining heritage and archaeology that reflects the long history of the extractive industries in South Gloucestershire, for example that around Iron Acton Parish.

Town and Parish Councils

- Some concern regarding existing HGV movements in the area, and that this will worsen with the reopening of quarrying operations in the area. More use should be made of transport by rail where opportunities exist.
- Impacts on the environment should be minimised.

Q23 Energy Management in New Development- Policy

Do you agree with our proposed policy approach?

Summary of comments

- There was support for the policy from a range of respondent groups, provided it can be shown to be viable.
- Some respondents wanted SGC to go further and adopt the Passivhaus standard as the minimum requirement for new development.
- There was support for allowing design flexibility when meeting the policy requirements.
- Respondents supported the use of energy offsetting where net zero energy cannot be achieved.
- Some respondents raised concerns that the draft policy exceeds national policy – as defined by the Building Regulations.
- There was some concern that the proposed space heating target would be too onerous, and about the quantity of information that would be required for pre-applications and outline applications.
- Amongst those with mixed views there was support for the application of energy metrics but concern that it would be difficult to meet the space heating target in detached homes and bungalows.
- The impact of the proposed targets on affordable housing targets was raised, as was a potential requirement for developers to rectify construction faults as a consequence of prolonged energy performance monitoring.

Q24 Embodied Carbon- Policy

Do you agree with our proposed policy approach?

Summary of comments

- Parish Councils gave broad support the Embodied Carbon policy particularly as a way of promoting the refurbishment and reuse of existing buildings.

- Members of the public also supported the policy, as a way of supporting the use of existing structures.
- Amongst developers, land agents and site promoters some did not object to the principle of setting embodied carbon targets, but concerns or objections were raised about the proposed targets.
- There was concern that the targets are too demanding and that they need to be supported by a robust evidence base.
- Amongst the 'maybes' there was a question about whether the information required to complete an embodied carbon assessment will be available from suppliers and manufacturers.

Q25 Renewable and Low Carbon Energy Systems- Policy

Do you agree with our proposed policy approach?

Summary of comments

- There were both general and technology specific comments for and against renewables from members of the public. Wind - concerns raised with wildlife impact, including bats and birds; we should not develop Severn Vale; and in support that we should take greater advantage of wind by the Severn. Comments for and against ground mounted solar. Comments in support and raising concerns about mine-water and quarries. Concerns with emissions from biomass. Tidal flow at the severn and nuclear power should be considered. Fossil fuel-based installations should not be acceptable (even with carbon capture). More focus in the policy on soil and biodiversity. Embodied carbon should be considered, as should renewable technologies on buildings.
- There was registered charity and business support for renewable generation. Business highlighted grid capacity and connection becoming a problem. A neighbouring council raised concern with impact on the road network; cumulative impact of solar and wind farms; and impact on Severn.
- Community group comments were in support, the economics of turbine development were raised in particular setting out that smaller turbines are generally not viable. The importance of community benefit was highlighted. Community wind turbines in national landscape can contribute to the objectives of the designation.
- Local councillor and neighbourhood planning group were both unsupportive. Concern with affordability and that there should be more focus on energy storage and rooftop solar.

- Natural England raised concerns re mapping (safeguarded areas). Set out some proposed concerns and alterations to some parts of text (in relation mainly to landscape and natural environment impacts) and support for others (mainly biodiversity and Green Infrastructure). Cotswold National Landscape Board highlighted their Renewable Energy Position Statement. In particular they raised concerns about the suitable areas for wind. They set out limits of scale that they consider suitable for solar and wind. Historic England raised concern about how heritage assets or landscapes are considered (including weight).
- General support from developers in principle however a highlighted need for policies to be properly assessed for cost implications and viability. Other comments include grid concerns and NPPF wind restriction. Wording considered too prescriptive. A highlighted need for a step change in renewables
- Mixture of responses from Town and Parish Councils- Some supportive, some supportive with specific technology issues. Need for storage, in particular hydrogen. Large scale development will be important but needs to be sensitively sited and avoid damaging locally (and nationally). Wind safeguarding was welcome. Concerns were also raised about wind safeguarding areas, including visual intrusion. Renewables should be on buildings. Concern with the density of solar farms. Question whether biomass should be included.

Q26 Community Energy- Policy

Do you agree with our proposed policy approach?

Summary of comments

- There were a variety of comments from members of the public. Various in support, raising issues such as local benefit and mindset change. Some raising concern with specific technologies or issues such as quarries; solar being on buildings not fields; concern with community conflict.
- National England and the Cotswold Natural Landscape Board both raised concerns. National England were concerned in relation to landscape harm. Cotswold Natural Landscape Board were concerned that the current wording sets an overly permissive approach.
- Parish councils were unsure or supportive with comments generally supportive, one council raised that large development should be sensitively sited.
- Community group and developer and land agent comments were generally supportive. The economics of turbine development were raised in particular setting out that smaller turbines are generally not viable.

Q27 Internal Space and Accessibility Standards- Policy

Do you agree with our proposed policy approach?

Summary of comments

Members of the Public

- Include outdoor space and space between houses and support for external private space of 5m.sq. The current sizes are too small and smallest in Europe. The NDSS standards are too small and the policy should go further. Disabled accessibility issues were raised, and the need for future proofing, including Lifetime Homes. Storage is key – where to put all the household items? The policy should not reduce standards relating to M4(2) and M4(3). Maintaining developer profits at expense of standards is not acceptable.

Business

- Support for M4(2) and NDSS standards within the policy, but provision of M4(3) should be based on identified need.

Developer

- Some support for NDSS and accessible standards, however, a greater level of feedback suggesting that approach is onerous and unreasonable. For example, YTL does not support M4(2) being mandatory and NDSS not supported, as need a range across the market. Some flexibility on a site-by-site basis is needed but the flexibility that is there, is welcomed. Flexibility needed to not hinder delivery of housing. Further evidence required at Reg19 stage on the need, viability and timings. NDSS data analysis exercise not yet provided and is needed. Constructing to NDSS will mean a higher sae price and there may be site constraints in terms of providing enhanced accommodation.

Parish/Councillors

- There is an opportunity to upgrade low-quality housing to better standards. NDSS and other standards need to be increased further. Lots of support for suggested approach but some responses suggesting that the policy wording could be strengthened.

Q28 Strategic & Major Sites Delivery Policy- Policy

Do you agree with our proposed policy approach?

Summary of comments

- There was general support for the policy (helpful framework approach) subject to clarifications around specific criteria.
- The limited objections considered that the policy was more part 'charter', requirements were onerous & site-specific allocation policies should deal with such matters. Probably not for a plan to state that land values should be shared equally. Suggest process for approving a masterplan would also be important. Some reticence around review mechanisms as may then have implications for site planning etc.

Q29 Stewardship Policy- Policy

Do you agree with our proposed policy approach?

Summary of comments

- Members of the public, councillors and Town & Parish Councils general supported the policy or objected on the basis that it does not go far enough to protect residents from 'fleecehold', i.e. fees should be capped or the Council should adopt new open space.
- The HBF, developers & promoters were broadly split equally. There was some strong and guarded support to the aspirations of the policy subject to further clarity around detail. Those objecting considered it was too prescriptive and required too much information too early in the process.
- Parish & Town Councils generally strongly supported the transparency and consultative process that the policy would bring to the process.

Phase 4 Consultation - Summary of responses to consultation questions

Q2 Emerging Spatial Strategy - Site Selection Process
Do you support the process, as set out in section 10 of the Topic Paper, used to select sites which are currently included in the Emerging Spatial Strategy?
Summary of comments • Support from a number of respondents for the detailed process that has been followed, including support for the robustness of emerging site selection outcomes that are resulting from this. • Some objections made by members of the public, concerned at the need for more transparent, inclusive sustainable approach to site selection – along with a need for more consideration for supporting infrastructure. These public responses also express concern that the process is developer-led, prioritising profit over sustainability, community and environmental needs. • Objections have been made by a number of developers about the approach taken to re-assessing sites that were excluded in previous iterations of the Housing and Employment Land Availability Assessment, including concerns that additional information submitted by site promoters through Phase 1, 2 and 3 consultations has been overlooked – resulting in the ongoing exclusion of some potential development sites based solely on inaccurate information. • Concerns from a number of developers about how the issues above have resulted in contradictory outcomes for different sites, with the regard had to constraints such as access to public transport being perceived to be different in some instances. • Further concerns from some developers that a constraints-led approach to site selection (e.g. based on primary school capacity) has resulted in the dismissal of individual sites and groups of sites, which could in fact provide opportunities to overcome those constraints by providing new infrastructure.

Q3 South Gloucestershire's Housing Need

Do you have any comments on the provision of additional supply to ensure greater flexibility to meet South Gloucestershire's housing needs, as set out in section 11 of the Topic Paper? Please also include comments about any individual sites listed at Table 1 at paragraph 11.1 and Appendix 1B.

Summary of comments

General comments on the principle of additional supply:

- A number of respondents agreed that the principle of applying an uplift is a pragmatic step to take to provide flexibility, for the reasons set out in the Topic Paper.
- In contrast, comments from some members of the public expressed concern with the principle of any further increase to levels of development in South Gloucestershire. Further detail on some reasons for this is set out at the bottom of this summary.
- Whilst a number of respondents agreed with a uplift at 10%, this amount of uplift was challenged by many developers who considered it to be arbitrary and unjustified. Many of these considered that the uplift should be higher.
- Some developers objected to the approach taken to only apply an uplift to new allocations within the housing supply, arguing that this is not best practice. They noted that it is common for planning permission to lapse on existing commitments, and argued that an uplift for flexibility should therefore be applied to the housing supply as a whole.

Specific comments were made on all of the 17 individual new sites identified in the topic paper consultation document.

SGC964 Land Northeast of Highbrook View, Harry Stoke

- Some members of the public objected to the site and raised concerns regarding its appropriateness, and over-development.
- Further objections were raised around insufficient healthcare, education and highway capacity in the vicinity.
- By contrast, comments from developers expressed support for the site, noting that there are no overriding constraints to development.

SGC970 Filton Retail Park, Fox Den Road, Stoke Gifford

- Some developers promoting other sites raised objections, arguing more evidence is needed to justify the ability to lose retail and employment uses from the site. These also suggested that more viability and deliverability evidence is needed.

- A number of responses from members of the public objected to the site, and the impact of removing shops used by local residents.
- Further objections were raised around insufficient healthcare, education and highway capacity in the vicinity, as well as a lack of green spaces for local residents.
- By contrast, some responses from the public expressed support for the site, noting that it is located within an existing urban area.

SGC974 Land at Westfield Lane, Stoke Gifford

- Comments of support were received from members of the public and Town and Parish Councils, noting the principle of reusing a brownfield site.
- Some concerns were raised around infrastructure implications given the site's current employment use, and whether new infrastructure capacity and services would be required in the vicinity to support a residential use.
- Some developers promoting other sites raised objections, arguing more evidence is needed to justify the ability to lose employment uses from the site.
- Members of the public also raised concerns regarding the lack of green spaces and the harmful impact that development could have on wildlife and the natural environment.

SGC977 Aviva Centre, Stoke Gifford

- Comments of support were received from members of the public, Town and Parish Councils and the site's developer, noting the principle of reusing a brownfield site and its alignment with the North Fringe of Bristol Masterplan.
- Some concerns were raised around infrastructure implications given the site's current employment use, and whether new infrastructure capacity and services would be required in the vicinity to support a residential use.
- Some developers promoting other sites raised objections, arguing more evidence is needed to justify the ability to lose employment uses from the site. These also suggested that more viability and deliverability evidence is needed.
- Members of the public raised concerns of overcrowding within the area, and a lack of green spaces for local residents.

SGC985 Land at Hambrook Lane, Harry Stoke

- Objections were raised by members of the public around insufficient healthcare, education and highway capacity in the vicinity.
- Further objections were received concerning the impact development would have on the wildlife in the area.

- In contrast, supporting comments were received by the site's promoter, highlighting that the site is a sustainable location for development and performs even better than the Sustainability Appraisal suggests. This also considered that the site can accommodate more dwellings than indicated in the consultation.

SGC937 Bradley Stoke Way

- An objection was received regarding the perceived ongoing loss of greenery in the area, and the lack of infrastructure capacity to support new development.

SGC861 Bolbrek, Filton Road

- Objections were raised by members of the public around insufficient healthcare, education and highway capacity in the vicinity.
- A number of comments also raised concerns about the harmful impacts that building in the Green Belt would have on the environment and wildlife, as well as visual impacts for local residents.
- Concerns regarding development's impacts on pollution, air quality and the health of local residents were highlighted.
- Comments also argued that the site an unsuitable location for development, by virtue of being Grade 1 agricultural land.

SGC363 Jarrats Yard, Oldland Common

- Objections were raised by members of the public around insufficient healthcare, education and highway capacity in the vicinity. These also cited concerns about a lack of employment opportunities near to the site.
- A number of comments also raised concerns about the harmful impacts that building in the Green Belt would have on the environment and wildlife.
- Concerns regarding development's impacts on pollution, air quality and the health of local residents were highlighted.
- The impact that development would have on worsening flood risk was highlighted as a concern in some responses.
- Some comments requested further clarity on of the suitability of the site, given heritage and landscape constraints.

SGC946 Pomphrey Hill, Mangotsfield

- Supporting comments were received by developers for this site, highlighting its suitability for development. This included a suggestion that consideration should be given to alternative forms and quantums of development on the site.
- In contrast, objections were received from members of the public, concerned about increased noise pollution.
- Specific concerns were raised around the number of housing sites within the area, and potential for the loss of community assets.

SGC956 Frenchay Christmas Tree Farm, Old Gloucester Road, Frenchay

- A wide range of comments were made by members of the public, and some councillors. Many of these focussed on existing perceived traffic problems and inadequate public transport provision, and hence an inability to accommodate new development.
- Other infrastructure issues identified by respondents include a lack of healthcare and education capacity, a lack of water supply capacity, and a lack of local services including shops.
- Comments identified a number of environmental impacts, such as increased flood risk, worsened air quality, impacts on wildlife, noise pollution, and impacts on wildlife.
- Many respondents objected to the principle of building in the Green Belt.
- Some respondents also suggested that the site is fundamentally unsuitable for development because of its proximity to the M32.
- It was also considered that the loss of the Christmas Tree Farm will be a loss to the community, and development would adversely affect the character of the area.
- Some concerns were also identified around the site's archaeological importance.

SGC980 Land adjacent to Bitton Sports and Social Club

- Objections were raised by members of the public around insufficient healthcare, education, public transport provision and highway capacity in the vicinity.
- Concerns were also raised by members of the public about the principle of developing Green Belt land, and the urban sprawl that would result from development.
- Supporting comments were made by the site's developer, highlighting that the site makes a limited contribution to Green Belt purposes. These comments also consider the site to be a sustainable location for development.

SGC 719 The Meads Common, Meads Lane

- Objections were raised by members of the public around insufficient healthcare, education and highway capacity in the vicinity, the distance to shops and services, and a lack of green space for residents.
- Specific comments considered that the number of dwellings proposed for the site is too high, and not sustainable.
- Concerns were also raised by members of the public about the principle of developing Green Belt land, in order to protect the environment and given the site's importance to wildlife.
- Some responses argued that the site an unsuitable location for development, by virtue of being Grade 1 agricultural land.

SGC399 Land at Hambrook Business Park, The Stream, Hambrook

- Objections were raised by members of the public around highway capacity in the vicinity, and the lack of local public transport options. A number of these comments also raised local issues around sewerage capacity.
- Many of the responses from members of the public identified concerns about existing flood risk on the site, which were considered likely to be worsened by development.
- Concerns were also raised about the impact of noise pollution and air quality on development, because the site is next to the M32.
- Comments were made by some developers, concerning the size of the site and whether it would have capacity to deliver affordable housing.

SGC749 The Oaks, Filton Road, Hambrook

- Supporting comments were made by the site's developer, highlighting the sustainable location of the site which would allow for sustainable travel patterns as well as the regeneration of a previously developed site.
- The site's developer also considers that potential identified archaeological and landscape constraints are able to be mitigated.
- A number of comments from members of the public raised concerns about the harmful impacts that building in the Green Belt would have on the environment and wildlife, including through the removal of wildlife corridors.
- Objections were raised by members of the public around insufficient healthcare, education, public transport provision and highway capacity in the vicinity.

SGC978 Land at Ladden Garden Village, Yate

- Comments on this site from all parties were broadly supportive. These consider that the site is situated in a sustainable location with links to an existing transport corridor and noted its ability to utilise existing infrastructure for a developing urban extension.
- Some comments from councillors and members of local parish councils called for more starter/affordable homes within the area.
- Further comments wished to ensure the provision of sufficient highway capacity, given the interaction between employment and residential areas in and around the Garden Village.

SGC979 Land at Leechpool, Ladden Garden Village, Yate

- The majority of comments supported this site, considering that it is situated in a sustainable location with links to an existing transport corridor and note its ability to utilise existing infrastructure for a developing urban extension
- Comments from councillors and members of local parish councils called for more starter/affordable homes within the area
- Some comments from members of the public expressed concern about excessive development in the area, and consider that employment uses should be prioritised instead.
- Further comments consider that plans for additional local services should be included in the development; including schools, a community centre, a pub, shops and a police station.

SGC963 CEMEX Floors, London Road, Wick

- Comments of support were received from the site's developer, considering that it is in a sustainable location that is previously developed. These comments also noted the site is situated away from historical assets, and would have a negligible impact on them.
- Comments from consultees note the presence of two areas of primary habitat deciduous woodland within the site, in order to ensure that the natural environment is protected.
- Various comments of objection were made by community groups, members of the public and the local parish council, concerned about highway capacity and traffic implications given the lack of public transport near the site. These also considered that development would have an adverse impact on walking routes around the site.
- A number of objections also identify a lack of local infrastructure and services to facilitate development, as well as a lack of local employment opportunities.
- Further objections were made regarding potential flooding, impacts to air quality and the site's general impact on the environment.

A range of general, non-site specific comments were made by members of the public, concerned with the general principle of allocating further new sites across South Gloucestershire:

- Sites in the Green Belt should not be being considered for release – the Green Belt should be protected.
- New development, in general terms, will have an unacceptable impact on the environment, the protection of green spaces, and on wildlife and habitats.
- There is a lack of infrastructure capacity to support any new development – in terms of highway capacity, public transport provision, education capacity, healthcare provision, and sufficiency of services and facilities.
- Development will result in a general worsening of existing issues around air quality.

Q4 Council's Approach to whether it can assist with Bristol City Council's Unmet Housing Need

Do you have any comments on the Council's approach to considering whether it can assist with Bristol City Council's (BCC) unmet housing need, as set out in section 12 of the Topic Paper?

Summary of comments

Comments on the conclusion reached:

- Town and parish councils, community groups and members of the public typically support the principle of meeting local needs in South Gloucestershire in advance of those from Bristol. These respondents therefore support the conclusion that Bristol's unmet needs cannot be accommodated within South Gloucestershire – arguing that doing so will jeopardise quality of life and environment.
- Responses from members of the public also consider that an unmet need from Bristol only (or partly only) arises because of particular decisions made in Bristol – including insufficient high-density development, options not being progressed to convert offices to residential uses, and too much student housing being provided.
- Contrasting comments were made by various respondents, including a number of developers, noting that South Gloucestershire is part of a singular housing market area in conjunction with Bristol. These responses consider that administrative boundaries are therefore arbitrary, and all authorities in the West of England should work jointly under to Duty to Cooperate to ensure that all housing needs are met for the West of England as a whole.
- Building on the point above, comments were made by developers arguing that unmet needs are also likely to arise in the near future from Bath and North East Somerset, which South Gloucestershire Council (and other West of England authorities) will also therefore need to establish how to jointly meet.
- It was noted in some responses that only a small increase to the housing supply would be needed for a 10% buffer to be provided in full. This could potentially be achieved through the identification of a small number of additional sites, or slight increases in assumed densities. Many developers argued that sites they were promoting could contribute to this shortfall.
- Some responses consider that not assisting with unmet needs from Bristol means that the Council is not currently complying with the Duty to Cooperate – and that it needs to do more, and identify additional development land within South Gloucestershire.
- A number of developer responses set out a view that the constraints presented in the Topic Paper (that mean additional housing supply cannot be identified) can be overcome – arguing that these are ultimately political decisions made by the Council.

Many respondents observed that a consultation draft update to the National Planning Policy Framework (NPPF) was published at the end of July 2024, during the Phase 4 consultation period. Views were particularly expressed by developers on the implications that the proposed changes to the NPPF could have:

- Given the Government's intention to publish the final new NPPF by the end of 2024, and the Council's anticipated Regulation 19 publication of the Local Plan in early 2025, some respondents set out their assumption that the provisions of the new NPPF will be in place when the Local Plan is published – and that the Council will therefore need to have regard to these.
- It was widely noted that the new standard method for calculating housing need will result in an annual housing need of 1,717 in South Gloucestershire, compared to the 1,366 per annum currently (which forms the basis for the housing need and supply set out in the Topic Paper). These respondents therefore consider that the Council now needs to identify more sites in order to meet South Gloucestershire's new needs (plus a buffer), regardless of any assistance with unmet needs from Bristol.
- Many of the same respondents noted that, whilst housing needs in Bristol will reduce as a result of the proposed removal of the previous 35% uplift to housing needs in urban areas under the new standard method, there will still be a significant amount of unmet need from the city which should be being dealt with in South Gloucestershire.
- The consultation draft of the NPPF proposes that authorities will need to accommodate housing needs, including unmet needs from neighbouring authorities, by releasing sufficient land from the Green Belt – unless evidence shows that doing so would fundamentally undermine the function of that Green Belt. This is different to the position in Paragraph 145 of the current NPPF, and which is reported within the Topic Paper. A number of respondents therefore consider that a Green Belt Review needs to be published, and that the Council should begin to identify sites in the Green Belt for development now.

Summary of Changes to the Local Plan as a result of 4 phases of Regulation 18 Consultation

Introduction

This section provides concise summaries of how each section of the Local Plan changed after the four phases of Regulation 18 Consultation.

Local Plan Objectives

Summary of Changes

Reg 18 Consultation phase	What we consulted on	How the plan has changed
Phase 1:	55 key issues for our area 9 priorities to address these issues	**As a result of consultation responses:** Add text acknowledging the role of the Plan's policies and strategy in balancing objectives and minimising and mitigating harm to achieve the best outcomes. General support for the policies but minor changes requested during P3 for clarification or emphasis: Objective 1 - 1a – addition of specific reference to student housing and focus on affordable homes, 1c -clarification of where sustainable locations for higher densities
Phase 2:	Updated objectives and sub objectives	

	Phase 3:	New Council priorities, updated objectives and sub objectives	Objective 2 - add reference to adaption of existing infrastructure and further clarification of objective in terms of reducing longer distance travel and making the best use of existing infrastructure Objective 3 – 3e in response to Woodland Trust added reference to prioritising preservation of existing trees. Objective 5 – 5e reword to better reflect role in supporting Town Centres Objective 6 – add reference to nature recovery and green infrastructure. **As a result of other factors**: • The cessation of work on the SDS changed the scope of the plan to include strategic policies on the homes, jobs and infrastructure we need to plan for and how this will be achieved. • New Council administration with its own priorities on climate change, nature emergency and the cost of living in May 23 • The development and publication of the Council Plan during 2023/4 with its 5 core goals
	Phase 4:		

Spatial Strategy – Strategy Principles, Locational Strategy and Delivery of New Homes

Summary of changes

When consulted, outcomes, what changes to the LP after consultation

Reg 18 Consultation phase	What we consulted on	How the plan has changed
Phase 1:	Building Blocks	**As a result of consultation responses:** The process for development of the emerging preferred strategy is described in the Phase 3 Regulation 18 consultation Chapter 5 Towards an emerging preferred strategy and Chapter 10 of the Additional Reg 18 Topic Paper consultation. To achieve the housing requirement the Local Plan contains a spatial strategy and supporting policy framework that responds to the need to: • Address issues of inequality and promote inclusion through reducing the barriers to and opening up access and availability of homes and jobs and the physical infrastructure people need to live successful and prosperous lives, helping everyone to have the best life chances and opportunity to reach their potential. • Allocate sites to deliver enough high-quality homes, with a focus on affordable and specialised homes, of different sizes, types and tenures to meet identified needs for all sections of our community, including, students, Gypsies, Travellers and Travelling Showpeople. • Prioritise land within our urban area and market towns, optimising density and uses on urban and brownfield land wherever possible to deliver additional new homes. • Recognise that greenfield sites of a range of sizes and locations will also be needed to contribute to delivering the homes needed, and that to achieve this sustainably, some Green Belt release will be required specifically
Phase 2:	Approach to sustainable villages and urban sites	
Phase 3:	Alternative lenses and emerging preferred strategy	
Phase 4:	Additional sites to provide buffer to our housing supply	

			around the north and east fringe of the urban area of South Gloucestershire and at a number of rural villages. This is in recognition that to ensure people can remain in their current communities, to reduce the need for longer car trips and to support our net zero goals in where it delivering homes, it is more sustainable to:- ○ Locate homes close to the north and east fringe of the urban area of South Gloucestershire where sustainable travel connections already exist, can readily be enhanced, or new connections can be delivered and which provide an attractive alternative to private car travel. ○ Locate homes and jobs in locations that are on existing public transport routes or could be capable of delivering in the future high-quality, viable and reliable journey patterns using active travel, and public transport to access key services and facilities, with the purpose of reducing dependency on long distance car reliant travel. ○ Locate homes that help to sustain rural communities and provide homes (including Affordable Homes) to meet their local housing needs. **As a result of other factors**: • Transport Topic Paper • Infrastructure Delivery Plan • HELAA Methodology • Sustainability Appraisal
	Regulation 19	Draft Policies: Strategy Principles and Locational Strategy for South Gloucestershire	

Making Effective Use of Land

Summary of changes

Reg 18 Consultation phase	What we consulted on	How the plan has changed
Phase 1:	Approach to optimising density	**As a result of consultation responses:** • As a result of comments to the draft policy at Phase 2 added more precise policy wording and specific references to updated associated policies. • To reflect the different characters of the market towns and urban areas in South Gloucestershire renamed the policy to include reference to Urban and Town Hubs rather than Urban Living **As a result of other factors**: • To align and be consistent with the policy style across the Plan • Added wording to clarify that part 1 must be met as well as part 2 and that all the criteria should be met. • Table 1 – remove composite density ranges for BNF, BEF Yate and Thornbury. The ranges are based on evidence of character of individual areas, so a combined figure is unhelpful
Phase 2:	Draft Policy and areas where it would apply	
Phase 3:	Proposed urban site allocations	
Phase 4:		

Settlement Boundaries

Summary of changes

<table>
<tr><th>Reg 18 Consultation phase</th><th>What we consulted on</th><th>How the plan has changed</th></tr>
<tr><td>Phase 1:</td><td></td><td rowspan="6">As a result of consultation responses:

As a result of other factors:
• Settlement Boundaries Review Method Topic Paper prepared
• Policy prepared for Regulation 19</td></tr>
<tr><td>Phase 2:</td><td></td></tr>
<tr><td>Phase 3:</td><td>Reference in Emerging Preferred Strategy Chapter at paragraphs 5.71 to 5.74 where the basis for undertaking amendments to settlement boundaries was presented.</td></tr>
<tr><td>Phase 4:</td><td></td></tr>
<tr><td>Regulation 19</td><td>Draft policy</td></tr>
</table>

Residential Development in the Countryside

Summary of changes

Reg 18 Consultation phase	What we consulted on	How the plan has changed
Phase 1:		**As a result of consultation responses:** • No changes were made because of public consultation **As a result of other factors**: • Change to the national policy NPPF in relation to new build and conversions. • Following further consideration with the development management and local ward member colleagues the policy has been further amended at the Regulation 19 Publication draft stage to re calibrate policy in response to development pressures.
Phase 2:		
Phase 3:	Draft policy	
Phase 4:		

Major Sites Delivery Policy (previously Strategic & Major Sites Delivery Policy)

Summary of changes

Reg 18 Consultation phase	What we consulted on	How the plan has changed
Phase 1:		**As a result of consultation responses:** • Requirement to ensure land-value costs are shared fairly & proportionately deleted as probably out of scope of what the planning system can realistically achieve. • Clarification that only 'strategic level' earthmoving information will be required at outline stage given that the development process wont reasonably have reached detailed design. • Clarification of the site allocations and threshold at which the policy will apply.
Phase 2:		
Phase 3:	Draft Policy	
Phase 4:		

			As a result of other factors: • Inclusion in supporting text of the likely necessity of forward funding for infrastructure and consequential need for developers to pay back these costs to provide confidence in the process/system and recognition of the likely need for CIL receipts to be used locally to support delivery of these strategic sites. • Further emphasis on Design Codes (when they'll be required) in the supporting text reflecting the direction of national guidance.

University of the West of England, Frenchay Campus

Summary of changes

Reg 18 Consultation phase	What we consulted on	How the plan has changed
Phase 1:		**As a result of consultation responses:** • This policy updated in response to Call for Sites responses to Phase 3 from UWE requesting updates to reflect changes in circumstances. **As a result of other factors**: • Following further consideration with development management and local ward member colleagues the Core Strategy policy has been amended at the Regulation 19 Publication draft stage to cover inclusion of ○ A response to the Local Nature Recovery Strategy focus area designation on the site allocation. ○ Updates to reflect the completion of transport infrastructure projects. ○ Updates to reflect the placemaking role of UWE in a rapidly developing residential area
Phase 2:		
Phase 3:		
Phase 4:		
Reg 19:	Draft policy	

			○ Further explanation of the range of uses which will be acceptable on the site ○ Additional text on security considerations in relation to the adjacent MOD site in response to a request from the MOD ○ Further clarification of expectations for supporting evidence which will required to accompany future planning applications within the UWE campus.

Land at former Filton Airfield - Brabazon

Summary of changes

Reg 18 Consultation phase	What we consulted on	How the plan has changed
Phase 1:		**As a result of consultations:** • This policy has been introduced in response to two planning applications for significantly higher density schemes which have superseded the current Core Strategy allocation and adopted SPD and considered consultation response from the site promoter to previous consultations. It will partially replace the Core Strategy Policy 26 - Cribbs Patchway New Neighbourhood. **As a result of other factors** • Following consideration with development management the draft policy includes: ○ A response to the two planning applications which have superseded the adopted masterplan SPD. ○ Updates to reflect the completion of transport infrastructure projects and infrastructure requirements for higher levels of development.
Phase 2:		
Phase 3:		
Phase 4:		
Reg 19	Draft policy	

			○ Updates to reflect the design and infrastructure requirements of higher density development and the placemaking role of Brabazon. ○ Policy criteria on the mix of uses including number of homes and safeguarded employment areas.	

Severnside Employment Area

Summary of changes

When consulted, outcomes, what changes to the LP after consultation

Reg 18 Consultation phase	What we consulted on	How the plan has changed
Phase 1:		**As a result of consultation responses:**
Phase 2:		
Phase 3:		
Phase 4:		**As a result of other factors**: • Following review, it was considered necessary to prepare an updated area policy for Severnside given substantial changes have taken place in this location since the Core Strategy was adopted.
Reg 19	Draft policy	

Affordable Homes

Summary of changes

Reg 18 Consultation phase	What we consulted on	How the plan has changed
Phase 1:		**As a result of consultation responses:** • The policy wording has been revised to provide clarity on which sites the 40% requirement applies to (also following viability assessment – see below). • A local connection requirement has been introduced on Affordable Homes for Rent on sites of up to 30 dwellings in rural villages with a population of 3,000 or less. **As a result of other factors:** • Following receipt of the whole-plan viability assessment, the AH requirement on relevant sites is 40% with at least 30% on brownfield sites and 30% on the Strategic Allocations. 20% will be sought on Age Friendly & Build to Rent Schemes. 50% will be sought on speculative Green Belt sites. • The AH target has changed from 6,709 to 6,686 (446 per year) to correct a minor error. • Following feedback from within the Council, criterion 2 of the main policy has been amended to include self and custom-build schemes to add clarity, and the requirements for self and custom-build on 100% AH sites of 100 dwellings or more have been further clarified. • The supporting text has been amended to clarify that the AH target includes just over 1,200 additional homes for social rent to meet the policy objective to reduce the number of people in the private rented sector relying on benefits to afford their housing costs in addition to meeting identified need, and that this allows for any losses from Right to Buy, Right to Acquire and small-scale demolitions to be absorbed while ensuring the identified need is met.
Phase 2:		
Phase 3:	Draft policy	
Phase 4:		

			• It has been clarified that the proposed AH Supplementary Planning Document will provide an update on any newly Designated Rural Areas (following any future review). • An explanation of Local Housing Allowance has been added. • The residual rent on shared ownership has been increased to 2.5% (from 1.5%) following feedback from housing association partners that the 1.5% product presents deliverability issues. • Further clarification has been added relating to discounted market homes.	

Accommodation for Gypsies and Travellers

Summary of changes

Reg 18 Consultation phase	What we consulted on	How the plan has changed
Phase 1:	Flagged G&T accommodation as a key issue for LP	**As a result of consultation responses:** • No further changes were considered necessary to be made to the policy. **As a result of other factors**: • Additional text to make clear positive benefit for proposals located within appropriate distance to key services and facilities. • Additional text to make clear that proposals that result in loss of G&T pitches will not be supported. • Additional text to make clear approach to meeting needs. • Additional text to make clear approach to windfalls.
Phase 2:		
Phase 3:	Draft Policy, sites for safeguarding	
Phase 4:		

Accommodation for Travelling Showpeople

Summary of changes

Reg 18 Consultation phase	What we consulted on	How the plan has changed
Phase 1:	Flagged accommodation for Travelling Showpeople as a key issue for LP	**As a result of consultation responses:** • No further changes were considered necessary to be made to the policy. **As a result of other factors**: • Additional text to make clear positive benefit for proposals located within appropriate distance to key services and facilities. • Additional text to make clear that proposals that result in loss of TSP plots pitches will not be supported. • Additional text to make clear approach to meeting needs. • Additional text to make clear approach to windfalls.
Phase 2:		
Phase 3:	Draft Policy, sites for safeguarding	
Phase 4:		

Houses in Multiple Occupation (HMO)

Summary of changes

Reg 18 Consultation phase	What we consulted on	How the plan has changed

Phase 1:		**As a result of consultation responses:**
		• No further changes were considered necessary to be made to the policy.
		
		As a result of other factors:
		• Following further consideration with the development management and local ward member colleagues the policy has been further amended at the Regulation 19 Publication draft stage to cover inclusion of:
		  • additional wording and diagram to assist with the assessment of harm in relation to the concentration of HMOs in a locality
		  • additional wording to assist with understanding relationship between statutory/ regulatory planning and housing functions
		  • additional wording to explain how car parking surveys will assist supporting planning applications.	

Phase 2:	Draft Policy		
Phase 3:			
Phase 4:			

Age-Friendly (previously CS20 ExtraCare Housing)

Summary of changes

Reg 18 Consultation phase	What we consulted on	How the plan has changed
Phase 1:		**As a result of consultation responses:** **As a result of other factors**:
Phase 2:		
Phase 3:		
Phase 4:		

	Reg 19:	Draft policy	• Following further consideration with Adult Social Care and Housing Enabling colleagues, Core Strategy policy CS20 has been amended at the Regulation 19 Publication draft stage to cover inclusion of ○ Care home need (added to NPPF definitions in December 2023) ○ Updates to where Housing with Care (ExtraCare) will be required, setting out requirements for location, access, design etc ○ Further explanation that the Affordable Homes policy will apply to Housing with Care developments regardless of Use Class ○ The preference for retirement housing need to be delivered as Housing with Care (ExtraCare) ○ The preference for residential care home need to be delivered as Housing with Care (ExtraCare) ○ Explanation that where Housing with Care (ExtraCare) is put forward under C2 Use Class, occupants are required to have a personal care need.	

Rural Exception Sites and Community Led Rural Housing

Summary of changes

Reg 18 Consultation phase	What we consulted on	How the plan has changed
Phase 1:		**As a result of consultation responses:** • RES now requires 'clear support from local community' not just Parish Council • Wording was amended to reflect concerns where Parish Councils weren't a balanced representation of community view & truly community led • Wording amended to ensure it was clear that RES schemes are in addition to Local Plan allocations
Phase 2:	Draft Policy	
Phase 3:		
Phase 4:		

			• Concern that RES were 'one size fits all' schemes, wording clarified to ensure scheme are appropriate for each settlement **As a result of other factors**: • Bold text wording now combines both RES and CLH, previously treated separately with an addendum for CLH • After reviewing with SGC Affordable Housing specialists specific wording concerning evidence of need has been updated to sign post to SGC guidance

Internal Space and Accessibility Standards

Summary of changes

Reg 18 Consultation phase	What we consulted on	How the plan has changed
Phase 1:		**As a result of consultation responses:** • The requirement for all new housing to meet the M4(2) accessible standard and NDSS was retained as originally proposed, as was the requirement to provide evidence with each application. • For market housing, the requirement to provide 4% of dwellings to M4(3) (2a) standard was retained from the Phase 3 draft wording but Major development wording was added to clarify that this requirement only affects developments of 10 or more dwellings. • For Affordable Housing, the 10% figure was retained and Major development wording added as a clarification in the same way as for market housing. • Wording was changed from 'age restricted housing for older people', to 'specialist accommodation for older people', which aligns with wording within the Local
Phase 2:		
Phase 3:	Draft policy	
Phase 4:		

			Housing Needs Assessment evidence base. The requirement for this type of accommodation to meet Building Regulation M4(3) (2a) is retained. • Following consideration of a number of consultation responses and after internal discussions, the final paragraph relating to exceptional circumstances was deleted, due to this wording affectively weakening the overall policy objectives and likely effectiveness.	

Safeguarded Employment Areas

Summary of changes

Reg 18 Consultation phase	What we consulted on	How the plan has changed
Phase 1:		**As a result of consultation responses:** • Clearer policy approach and definition set out for priority uses, economic and non-economic development uses, and to proposals within the East Fringe of Bristol Urban Area. • Specific policy requirements added for Safeguarded Employment Area within University of the West of England. • Updated (and separate) Severnside Employment Area policy prepared for Reg 19 covering specific requirements for this location. **As a result of other factors**: • Context for policy updated to align with emerging West of England Mayoral Combined Authority Growth Plan
Phase 2:		
Phase 3:	Within Draft Economy and Jobs Policy	
Phase 4:		

			• Following further consideration with SGC Development Management colleagues drafted as a separate policy to Non-Safeguarded Employment Sites, similar to adopted Core Strategy. • Following further consideration with SGC Elected Members policy updated to include requirements for making efficient use of land and management of off-site impacts. • Specific policy requirements added for Safeguarded Employment Areas within Land at Former Filton Airfield (Brabazon), and for some Safeguarded Employment Areas being allocated within Strategic Site Allocations. • Safeguarded Employment Areas defined and updated alongside the Locational Strategy

Non-Safeguarded Employment Sites

Summary of changes

Reg 18 Consultation phase	What we consulted on	How the plan has changed
Phase 1:		**As a result of consultation responses:** • Clearer policy approach and definition set out for economic and non-economic development uses. • Greater clarity provided on assessment of improved economic output. **As a result of other factors**:
Phase 2:		
Phase 3:	Within Draft Economy and Jobs Policy	
Phase 4:		

			• Following further consideration with SGC Development Management colleagues drafted as a separate policy to Safeguarded Employment Areas, similar to adopted Core Strategy. • Following further consideration with SGC Elected Members policy updated to include requirements for making efficient use of land and management of off-site impacts.

Employment and Skills Development

Summary of changes

Reg 18 Consultation phase	What we consulted on	How the plan has changed
Phase 1:		**As a result of consultation responses:** • Greater clarification provided on requirements for Employment and Skills Plans in response to consultation responses from Property agents/ Businesses raising concerns of viability. **As a result of other factors**: • Following further consideration with SGC Development Management colleagues drafted as a separate policy to safeguarded and non-safeguarded employment. • Following further consideration with SGC Elected Members policy requirements updated to address issues of particular importance within South Gloucestershire.
Phase 2:		
Phase 3:	Within Draft Economy and Jobs Policy	
Phase 4:		

Town Centres, Retail and Leisure

Summary of changes

Reg 18 Consultation phase	What we consulted on	How the plan has changed
Phase 1:		**As a result of consultation responses:** • Updated and clarified criteria and definition for accepted uses within Primary Shopping Areas and wider Town Centre boundaries • Greater clarification on criteria for transport access • Greater clarification on application of requirements for Non-Safeguarded Employment Sites policy. Considered appropriate to still apply to main town centre uses. • Boundary of Downend Town Centre amended to include dentist • Consideration given to Yate Primary Shopping Area, however no changes to boundary were considered appropriate. • Consideration given to role of The Mall and Cribbs Causeway and considered appropriate to remain as Out of Centre. • Consideration given to designation of Local Centre at Gallagher Retail Park at Longwell Green and considered not appropriate. • Topic Paper prepared as supporting evidence for approach to Planning for Town Centres **As a result of other factors**: • In consideration with SGC Elected Members protection provided for local facilities such as village shops in line with NPPF, accepted uses within Primary Shopping Areas and wider Town Centres boundaries updated to reflect local needs, greater clarification provided for contribution to the public realm, Active Travel, and EV charging, and requirements for Effective Marketing updated.
Phase 2:		
Phase 3:	Draft Policy	
Phase 4:		

			• Following consideration of technical evidence, greater clarification provided for creation of new Town Centres, application of the sequential and impact tests, where draft policy would take precedence over saved policy PSP32: Local Centres, Parades and Facilities, and greater definition between Town Centres and Local Centres. • Greater clarification made on requirements relating to offices within Safeguarded Employment Areas • Proposed Local Centres designated from existing facilities and within Strategic Sites

Major Stadia

Summary of changes

Reg 18 Consultation phase	What we consulted on	How the plan has changed
Phase 1:	N/A	
Phase 2:	N/A	
Phase 3:	N/A	
Phase 4:	N/A	
Reg 19	Draft Policy	Policy prepared for Regulation 19

Sustainable Movement & Transport Infrastructure

Summary of changes

When consulted, outcomes, what changes to the LP after consultation

Reg 18 Consultation phase	What we consulted on	How the plan has changed
Phase 1:	Set the context for transport through Local Plan objectives informed by local and national planning principles	
Phase 2:	Confirmed the Local Plan objectives set out previously taking into account the responses received during Phase 1	**As a result of consultation responses:** As a result to responses received during Phase 1 objectives were updated and re-confirmed.
Phase 3:	Explored the spatial strategy through the Emerging Preferred Strategy and the three alternative lenses. These were supported by transport planning principles set locally and nationally	**As a result of consultation responses:** **As a result of other factors**: Policy prepared for Regulation 19
Phase 4:		

	Reg 19	Draft Policy	

Parking Requirements, including Electric Vehicles

Summary of changes

Reg 18 Consultation phase	What we consulted on	How the plan has changed
Phase 1:	Draft policy	**As a result of consultation responses and internal discussions with SGC officers:** • Much of the draft policy wording relating to EV charging and infrastructure which was part of the public consultation was deleted, due to changes to the NPPF and Buildings Regs Part S incorporating the proposed policy requirements. Changes essentially require residential (new-build, change of use, and major renovations) to include a higher level of active and passive charging facilities. Remaining text refers directly to Part S. • Retaining the existing parking standards, unless a lower provision can be justified, is the chosen approach, as this will protect existing provision in less sustainable areas, while allowing lower provision in more sustainable areas. • Reference to Strategic Urban Extensions (SUEs) added following strategic housing locations work. • Specific car clubs text added, applied to the whole district and for SUEs. • Parking Zones name removed and now covered under the renamed Urban and Town Hubs (formerly Urban Lifestyles areas). • Parking zones map removed and now only a link will be displayed • All the footnote text covering technical standards from the existing PSP16 Parking policy have been brought into the main policy wording as bullet points, as they are required to be followed.
Phase 2:		
Phase 3:		
Phase 4:		

			• Specific requirements relating to HMOs has been brought into the policy from the existing PSP16 policy. • Text relating to disabled parking has been included in an amended form from PSP16. • Text referring to mobility scooters storage added. • Parking standards for external parking spaces and for garages increased to accommodate bloating of vehicle sizes. • Visitor parking wording amended and clarified. • Enhanced cycle parking wording added relating to secure and covered design. **As a result of other factors**:	

Climate Change Mitigation and Adaptation

(for Reg 19 there will be two policies Climate Change, Sustainable Design and Construction and Climate Change Adaptation and Resilience)

Summary of Changes

Reg 18 Consultation phase	What we consulted on	How the plan has changed
Phase 1:	General policy wording on mitigation and adaptation	**As a result of consultation responses:** • Many comments in phase 3 were about issues wider than the policy. The title has been revised to make it clear that this policy is development specific. Some bullets have been altered or removed as including them within this policy is
Phase 2:		

	Phase 3:	Overarching policy wording amended and updated and more in depth technical policy on Adaptation and resilience added	further adding to the confusion around the purpose of this policy. They are issues better suited to the objectives of the plan or included within other policies. **As a result of other factors**: • The need to build resilience to a changing climate into development has raised in importance and the Phase 3 consultation policy had additional adaptation and resilience wording. • Adaptation and resilience wording moved to a separate policy after phase 3 consultation. This will be in 'Climate change adaptation and resilience' for Reg 19. This wording is technical and therefore sits better as a separate technical policy alongside the two other technical polices' Energy Management in new development' and 'Embodied carbon'. • Water part of overaching policy altered due to different evidence for Bristol and Wessex water areas.
	Phase 4:		

Energy Management in New Development

Summary of changes

Reg 18 Consultation phase	What we consulted on	How the plan has changed
Phase 1:		**As a result of consultation responses:**

	Phase 2:	Introduction of policy to supersede CS4 and PSP6, and parts of CS1	• The title of the policy has been amended as the consultation comments suggested that the reference to carbon was confusing. • The space heating target for bungalows and detached dwellings has been raised from 15kWh/m^2.yr to 20kWh/m^2.yr to address concerns raised in the comments about technical feasibility. • We have amended the policy text on *Energy Offsetting* to provide greater clarity. • We have amended the text under *Heating and Cooling systems* to provide further clarification on optimising solar gain. • We have reworded the text under *Energy Monitoring* to set out the policy requirements in greater detail. **As a result of other factors**: • We have revised the cost per MWh for Energy Offsetting to take account of inflation. • We have amended the policy to include Energy Use Intensity targets for non-residential buildings according to typology based on evidence provided by the UK Net Zero Carbon Buildings Standard. • We have amended the Supporting text to provide more details and clarifications on *Energy use in new development, Energy assessments, Communal heating, Biofuels, Heat Networks, Energy Offsetting* and *Passivhaus*. • We have made other minor amendments to the text for clarity and sense.
	Phase 3:	Policy redraft	
	Phase 4:		

Embodied carbon

Summary of changes

Reg 18 Consultation phase	What we consulted on	How the plan has changed
Phase 1:		**As a result of consultation responses:** • We have reworded parts of the policy text to clarify the policy requirements and how these relate to other requirements for new development including climate adaptation and resilience. • We have amended the text on refrigerants and the use of virgin tropical hardwoods for clarity. • We have amended the text under the heading *Demolitions, waste and recycling* to set out the policy requirements in greater detail. • In the supporting text under *Embodied Carbon Assessments*, we have provided greater detail on the policy requirements and how Embodied Carbon Assessments should be undertaken. • We have split the Embodied Carbon target into two parts: Upfront Embodied Carbon and Wholelife Embodied Carbon and provided a more detailed definition of each element in the supporting text. This change is intended to make the requirements clearer for developers and to align the
Phase 2:	Introduction of an Embodied Carbon policy	
Phase 3:	Policy redraft	
Phase 4:		

			policy with that proposed by other LPAs seeking to introduce a policy on embodied carbon. **As a result of other factors**: • See changes above.	

Renewable and Low Carbon Energy Systems

Summary of changes

Reg 18 Consultation phase	What we consulted on	How the plan has changed
Phase 1:	Renewable and low carbon energy cited as a key issue for LP. RERAS (key evidence base) being developed, working with partners. Draft policy published.	**As a result of consultation responses:** • Updates to policy to address specific issues relating to individual proposed wind safeguarding areas. • Tweaks to wording for clarity. **As a result of other factors**: • Development of a separate policy on community energy to ensure all communities are able to look to develop this resource if there is community support. • Post Phase 3 this policy was altered to accord with changes to national policy.
Phase 2:	Strategy and principles for renewable energy generation. Potential areas for safeguarding.	

Phase 3:	General approach to renewables, solar and wind (inc. areas for safeguarding), and supporting policy. Draft policy published.	
Phase 4:		

Community energy

Summary of changes

Reg 18 Consultation phase	What we consulted on	How the plan has changed
Phase 1:	Renewable and low carbon energy cited as a key issue for LP	**As a result of consultation responses:** • Phase 3 -Tweaks to wording for clarity **As a result of other factors**: • Development of a separate policy on community energy to ensure all communities are able to look to develop this resource if there is community support. • Post Phase 3 this policy was altered to accord with changes to national policy.
Phase 2:	Importance of community energy highlighted in renewables chapter	
Phase 3:	Separate policy introduced	
Phase 4:		

Strategic Green infrastructure and Environment

Summary of changes

Reg 18 Consultation phase	What we consulted on	How the plan has changed

Phase 1:		**As a result of consultation responses:**
		• At Phase 2; the updated CS2 policy introduced a network of 9 Strategic Green/Blue Infrastructure Corridors, supported by an audit report that set out the approach for identifying corridor boundaries and GI assets contained within them.
		• At Phase 3; refined corridor boundaries were presented, together with analysis justifying visually important hillsides (VIH) and strategic viewpoints, with the supporting report providing additional clarification.
		• At both phases the criteria and supporting text for policy CS2 reflected the updates to the emerging GI network.
		
		As a result of other factors:
		• To respond to consultation feedback from Phase 3, at the Regulation 19 Publication draft stage, further refinements have been made including:
		  ○ corridor boundary mapping refinements, incorporating wording to explain updates in the strategic GI corridor report
		  ○ within LCA SPD Annex 2, presentation of an additional SVP at Winterbourne and explanation of why potential views identified in consultation responses do not meet strategic viewpoint criteria
		  ○ within LCA SPD Annex 1, review of VIHs to ensure they reflect where OS mapping contours are shown close together and represent the most prominent hillside/river slopes in views across the landscape; identification of

Phase 2:	Draft policy replacement for CS2	
Phase 3:	Revised draft policy	
Phase 4:		

			additional VIH and explanation of why other hillside formations identified in consultation responses do not meet the VIH criteria; inclusion of a new checklist of issues to be considered where development or any other significant land use change may physically/visually impact upon VIHs as an appendix.

Ecology and Biodiversity Net Gain (previously Biodiversity Net Gain)

Summary of changes

Reg 18 Consultation phase	What we consulted on	How the plan has changed
Phase 1:		**As a result of other factors**: • As a result of the introduction of Biodiversity Net Gain (BNG) through the Environment Act 2021 which became mandatory in February 2024, we have updated and replaced PSP19 to include criteria on BNG. • Added reference to nature recovery in response to national policy on Nature Recovery and adoption the Local Nature Recovery Strategy in autumn 2024. • As a result of discussions with development management, policy criteria have been updated to clarify policy approach to ecology and nature recovery.
Phase 2:		
Phase 3:		
Phase 4:		
Reg 19	Draft policy	

Creating well-designed places

Summary of changes

Reg 18 Consultation phase	What we consulted on	How the plan has changed
Phase 1:	Draft policy	**As a result of consultation responses and SGC officer engagement:** • Overall policy wording been made more concise and the policy has been shortened (compared with the Phase 1 version), with each of the introduction paragraph under each main heading being incorporated under a more legible lettered paragraph. • Various terms have been clarified and explained, including 'high-quality', and 'appropriate'. • The structural link with the National Design Guide (NDG) has been explained within the intro text and the NDG colour wheel has been added. • Clear references to the Council's pre-application process, design codes, masterplans, the design review panel process and Building for a Healthy Life (the successor to Building for Life 12) have all been added. • Context and Identity section emphasis changed to cover innovative design solutions. • Backland and infill development criteria added. • Wording on microclimate factors affecting amenity and green & blue infrastructure being compatible has been added. • Various sections of text have been removed, due to already being covered by other policies, such as sustainability, energy and resources. • Where the subject of policy text refers to other areas of policy, such as landscape, sustainability etc. it specifically relates to aspects of the design of developments and does not repeat policy text.
Phase 2:		
Phase 3:		
Phase 4:		

			• The Purpose/Introduction text has been amended to include a wider commentary on how urban design can create better places for people. • The supporting text section has been re-written to carefully explain all of the design references set out in the bold policy text and how the policy requirements are to be met, including new sections on age-friendly design and types of parking provision. It also signposts other policies and guidance. **As a result of other factors**: • Changes to the NPPF at multiple dates • Introduction of the National Design Guide (date) • Introduction of the National Model Design Code (date) • DRP (date) • Consultation with SGC officers and Members	

Stewardship (previously Stewardship Arrangements)

Summary of changes

Reg 18 Consultation phase	What we consulted on	How the plan has changed
Phase 1:		**As a result of consultation responses:** • In response to concerns about the role and functioning of private management companies by local communities, the policy has been reworked to provide a clear
Phase 2:		
Phase 3:	Draft Policy	

	Phase 4:		preference and sequential approach to adoption of open space and amenities and set clearer requirements for the establishment of Resident Management Companies. **As a result of other factors**: • As above, in response to the CMA report in housebuilding and in particular investigation into 'fleecehold'. Recommended public adoption as preferred approach subject to further research.

Private & Communal Amenity Space Standards (previously Private Amenity Space Standards)

Summary of changes

Reg 18 Consultation phase	What we consulted on	How the plan has changed
Phase 1:		**As a result of other factors**: • Did not include in any of the public consultation phases as the policy is being saved, with only a number of more minor clarifying changes to policy wording and supporting text. • None of the fundamental policy requirements relating to amounts of amenity space required have been changed. • A clearer and more obvious separation of private and communal amenity spaces bold policy wording has been introduced, in response to issues encountered while applying policy to planning applications.
Phase 2:		
Phase 3:		
Phase 4:		
Reg 19	Draft policy	

			• Title of policy changed to incorporate additional 'communal' wording to clarify and confirm that private and communal amenity space should be treated in a separate way. • Additional wording and clarification covering new buildings and extensions within the general coverage of the policy. • Some tightening of the language making it clearer that the provision of appropriate private and communal amenity spaces are required. • Clarification of the requirements around communal amenity space but no additional wording on levels (areas in m.sq.). • Addition of specific wording on student accommodation relating to the provision of external communal amenity spaces, and to soft landscaping. • Supporting text wording amended to clarify and explain the amended policy wording and how each type of space should be provided.	

Mineral working and restoration

Summary of changes

Reg 18 Consultation phase	What we consulted on	How the plan has changed
Phase 1:	Flagged mineral supply as a key issue for LP.	**As a result of consultation responses:** • Update of figures relating to supply. • Inclusion of development considerations for each of the preferred areas. **As a result of other factors**:
Phase 2:		
Phase 3:	Draft Policy, areas for wind safeguarding	

			• Strengthening of approach in relation to restoration and accessibility of restored areas. • Strengthening of approach to ancillary/s secondary operations. • Updates to supporting text to include information contained within P3 minerals chapter.
	Phase 4:		

Nationally Significant Infrastructure Projects (NSIPs), New Nuclear Build, Radioactive Waste, Oldbury A Decommissioning

Summary of changes

Reg 18 Consultation phase	What we consulted on	How the plan has changed
Phase 1:	Draft policy	**As a result of consultation responses:** • Inclusion of cross references to climate change, nature recovery and biodiversity policies • Strengthen of approach to holistic consideration of mitigation and benefits arising from decommissioning and new nuclear build through NSIP process • Strengthening of specific policies on decommissioning and radioactive waste, and reference to emergency planning included **As a result of other factors**: • Amended wording for new nuclear reflecting latest position of Great British Nuclear and their purchase of the nationally designated site at Oldbury. • Strengthening of new nuclear policy to ensure adequate consideration is given to relevant themes and associated issues, constraints and opportunities.
Phase 2:		
Phase 3:		
Phase 4:		

Waste Policy

Summary of changes

Reg 18 Consultation phase	What we consulted on	How the plan has changed
Phase 1:		**As a result of consultation responses:** n/a **As a result of other factors**: Policy prepared for Regulation 19
Phase 2:		
Phase 3:	Set the context (at Chapter 11) for the Publication draft (Regulation 19) plan to include a strategic policy covering: waste arisings and waste management, and development management criteria related to waste management facilities at site-level and larger facilities.	
Phase 4:		
Reg 19	Draft policy	

Appendix 1 – Duty to Cooperate Position Statement

South Gloucestershire Local Plan Duty to Cooperate Update December 2024

Introduction

The Duty to Cooperate (DtC) places a legal duty on local planning authorities and prescribed public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of their local plan in the context of strategic cross boundary matters.[1] We also need to work with these DtC bodies and other key stakeholders on issues of common concern in order to develop a sound plan.

This paper provides an update on this activity covering the period from December 2022 to December 2024. This covers the period from when the Council communicated to all stakeholders that it had reset its local plan work programme and timetable following the unilateral decision of the Mayor of the West of England Mayoral Combined Authority (MCA) to stop work on the Spatial Development Strategy (SDS) in May 2022, to the point it has substantially completed work on preparing the Regulation 19 Publication draft Local Plan. The purpose of the schedule below is to outline where we have made progress with identifying and resolving any strategic cross boundary matters with our DtC partners and where there are outstanding issues to be resolved before we submit our new Local Plan. A DtC statement together with any Statements of Common Ground between us and our partners will be published at Submission of the plan.[2]

It also outlines progress we have made working with our DtC partners as well as other key bodies on issues of common concern which affect the soundness of the plan.

[1] Section 33A(4)of the Planning and Compulsory Purchase Act 2004 (PCPA 2004) indicates that Local Planning Authorities have a duty to cooperate with prescribed bodies identified in paragraph (a), (b) or (c) or subsection (9) of the PCPA 2004.

[2] National Planning Policy Framework 2023 paras 24-27 provides guidance on maintaining effective collaboration between Local Planning Authorities.

Progress with complying with the DtC

May 2022 West of England Mayoral Combined Authority

On 9th May 2022 the Metro Mayor of the West of England Mayoral Combined Authority (MCA) took the decision to halt all work on the West of England Spatial Development Strategy (SDS). As a result, the strategic planning framework for South Gloucestershire is now being provided by the South Gloucestershire Local Plan. This includes determining the amount of housing to be provided over the Plan period and the location of this housing growth across the district, as well as other strategic policies. The Regulation 19 Publication draft Local Plan provides the full list of proposed policies covered by the new Local Plan.

December 2022 Local Plan Update

In December 2022 we wrote to DtC bodies to provide an update on the Local Plan Delivery Programme to reflect the change in scope explained above. In so doing, we identified DtC adjoining authorities and prescribed public bodies, as well as other key stakeholders that we needed to have regard to in relation to cross boundary strategic matters/ issues of common concern. Accordingly, an individual letter was sent to each of these contacts. Taking into account any responses to earlier Local Plan (Reg 18 Phase 1 and Phase 2) consultations and our work with each partner to date, we identified strategic matters with potential cross boundary implications. We sought views on these, any joint evidence requirements and how best to work together during the preparation of the plan to resolve any outstanding matters. In summary cross boundary strategic matters related to:

- Assessment of and responding to the housing needed and particular types of housing for different groups in the community, including affordable housing; families with children; older people; students; people with disabilities; service families; travellers.
- Assessment and delivery of economic development requirements.
- Assessment and identification of strategic transport and other infrastructure.
- Assessment of and approach to climate change mitigation and adaptation.
- Nature recovery.

Letters were sent by email on 20/21 December 2022. The responses we received identified where strategic cross boundary matters and issues of soundness were considered to exist under these broad headings and needed further work to resolve but also, importantly, confirmed where no issues existed. Since December 2022 we have worked actively, constructively and on an on-going basis with relevant DtC bodies and other key partners in developing our Local Plan, which has also included considering whether the Council can meet any of Bristol City Council's (BCC) unmet housing need.

The Phase 3 'Towards a preferred strategy' document (December 2023)

This was published for consultation from 6 December 2023 to 16 February 2024 and provided a formal opportunity to comment on our emerging policies including those relating to housing and employment need, spatial strategy and infrastructure required to support growth. All DtC contacts and other key stakeholders were sent a letter by email on 13 November 2023 advising of this engagement, as well as again at the formal notification at the start of consultation.

Phase 4 consultation on the Council's strategy concerning ensuring adequacy of its own housing land supply and whether it can assist with Bristol City Council's unmet housing need, (July 2024)

This provided further clarification on the process for how the lenses used to apportion site locations in Regulation 18 Phase 3 consultation were chosen, and the process of site selection to form part of the Emerging Spatial Strategy; identified additional supply to provide greater flexibility to meet South Gloucestershire's housing needs; and the Council's approach to considering whether it can meet any of Bristol City Council's (BCC's) unmet housing need to ensure the Council continues to discharge the duty to co-operate under s.33 A of the Planning and Compulsory Purchase Act 2004 on the cross-boundary strategic issue of BCC's unmet housing need. It also included publication of a spreadsheet that presented SGC's approach, throughout the Local Plan process from the first call for sites, using an objective approach to progressively sift sites, which included transport accessibility and infrastructure criteria.

Summary of matters of cross boundary significance and issues of soundness identified following close of Local Plan Reg 18 consultation stage

The schedule set out at Appendix 1 notes the strategic key issues identified and agreed between South Gloucestershire Council and each of our DtC partners and key stakeholders as a result of work undertaken from December 2022 to December 2024, and on-going engagement with individual stakeholders. It provides a comprehensive summary of where work to date with our partners has resulted in resolution of strategic cross boundary matters and other key issues of soundness, and where work is ongoing to continue to resolve outstanding issues. This will enable partners to identify where we may have missed key issues or where further work is required to demonstrate compliance with the DtC up to the point the Local Plan is submitted.

Column 1 – lists the adjoining local authorities and DtC prescribed public bodies as well as key stakeholders with whom we have common concern in reaching a sound plan.

Column 2 – records where a response was received to our December 2022 Local Plan update

Column 3 - records where a response was received to our December 2023 Local Plan Phase 3 consultation

Column 4 – provides a summary of key issues identified as a result of the December 2022 consultation and in working with partners in developing our Local Plan Phase 3 – Towards a preferred strategy consultation document

Columns 5 and 6 – provides a summary of key issues raised in response to our Local Plan Phase 3 and 4 consultations. It identifies where there are, or are not, issues relating to DtC process and key strategic cross boundary issues/ other soundness matters. It also notes the progress that has been made to resolve outstanding issues and where this document or intended to be documented when the Plan is submitted for examination.

Column 7 – position as at December 2024

As the Duty applies to the Council up to the point of submission of its Local Plan for independent examination (Regulation 22), officers will continue to ensure it fully complies and documents sufficient evidence to demonstrate it has met the requirements of the Duty to Co-operate. This will be presented through preparing a Duty to Co-operate Compliance Statement and through Statements of Common Ground. Ensuring this is completed is crucial as should South Gloucestershire Council fail to demonstrate that it has complied with the duty at the point of submission, then there is no further opportunity to comply with the duty and its Local Plan will be unable to proceed further in examination.

Appendix 2

Summary of matters of cross boundary significance and issues of soundness identified following close of Local Plan Reg 18 consultation stage

Organisation/ DtC Category	DtC update Dec 22 reply	Local Plan P3 Dec 23 reply	Strategic cross boundary and other issues of common concern raised through DtC consultation and joint working prior to P3 consultation	Following close of Reg 18 Phase 3 consultation summary strategic cross boundary and other issues of soundness subject to ongoing review and discussion	Following close of Reg 18 Phase 4 consultation summary strategic cross boundary and other issues of soundness subject to ongoing review and discussion	Position as of December 2024
Bristol City Council / **Adjoining authority**	Yes	Yes	**Housing need and strategy** • The potential for addressing unmet need. • Recognition of the need for consistency of approach in relation to assessing housing need and urban capacity. **Employment land** • The need to understand the potential impact of employment land strategies as between the two authorities.	**Housing need and strategy** • SGC confirmed in its Local Plan Phase 3 – Towards a preferred strategy that it is intending to meet its housing need (Standard Method) in full and will not be asking BCC to meet any unmet need. (Local Plan Phase 3 Section 3a) • In October 2023 BCC wrote to SGC setting out its capacity to meet its housing need. This requested that SGC explore through its local plan whether it could accommodate a proportion of Bristol's unmet locally derived housing need. At the time SGC received this request it was finalising its Reg 18 Phase 3 consultation ahead of the Cabinet approving the document for public consultation at its meeting on 11th November 2023. SGC accordingly advised in its response to the BCC Reg 19	BCC further responded to the consultation noting the Council's approach and requesting that the Council continues to consider the potential to meet some of Bristol's unmet housing need before the South Gloucestershire Local Plan's Regulation 19 publication stage. BCC further suggested that SGC commits to an early review or immediate review so that issues of unmet need can continue to be explored and that if sufficient allocations cannot be identified to meet a proportion of BCC's unmet housing need at this stage, that the Local Plan could consider identifying potential options for future growth, for instance 'safe guarded land', or longer terms contingencies that might be considered for	• No DtC issues have been raised by BCC in relation to how SGC has sought to engage in the preparation of the SGC Local Plan to date. • That preparing the South Gloucestershire Local Plan is the appropriate process to assess and determine if any of the remaining housing need as set out in the BCC letter of 31st October letter, or any subsequent update to this, which can't be accommodated in Bristol, can be delivered in South Gloucestershire. • SGC will advise and discuss with BCC on how it has addressed matters raised in consultation responses prior to commencing its Reg 19 Local Plan Publication draft public consultation. This forms part of the Council's active, constructive and ongoing discussion with BCC on strategic matters that cross administrative boundaries and on-

			Transport and infrastructure • The need to recognise and ensure that the authorities work together on transport infrastructure and that evidence commissioned by both councils takes account of proposed growth in adjoining authorities. • The need for a joined-up approach to infrastructure planning across the two authorities including education, sports and community facilities	consultation dated 26th January 2024, that it agreed with BCC that preparing its Local Plan was the appropriate process to assess and determine if any of the remaining housing need as set out in the BCC letter of 31st October letter, which can't be accommodated in Bristol, can be delivered in South Gloucestershire. • That by using the same Local Housing Need Assessment (LHNA)consultants, who have used the same methodology, has resolved any potential issues regarding the identification of Local Housing Need for South Gloucestershire in relation to the other West of England Councils. A Local Housing Need Assessment (LHNA) summary document jointly commissioned by the West of England Councils provides further details of the consistent approach taken to identifying housing needs. **Employment Land** • BCC in its letter of 31st October 2023 confirmed that it does not have any unmet need for employment land. Therefore, it is agreed that this is not a strategic cross boundary matter the SGC Local Plan needs to address. **Transport and Infrastructure** • Work is continuing on technical evidence reviewing the impacts of growth in SGC and Bristol and potential mitigation. This work is being undertaken with inputs from National Highways (NH) and	development as part of a future local plan review, subject to the necessary investment in infrastructure.	going joint working integral to the production of a positively prepared and justified strategy. • SGC will look to agree a joint Statement of Common Ground (SoCG) with BCC and B&NES on strategic cross boundary and any bilateral matters, as required prior to submitting its Local Plan for Examination.

				the West of England Mayoral Combined Authority (MCA) and aims to identify and resolve potential strategic cross boundary or soundness issues including impact on the M32 and wider strategic road network. See supporting transport technical evidence.		
Bath & North East Somerset Council / **Adjoining authority**	Yes	Yes	**Housing need and strategy** • Potential for unmet need from both councils • Need for consistency on evidence on housing need and urban capacity • As locational strategy progresses cross boundary issues may arise. **Employment land** • Potential for cross boundary issues as evidence and strategy are developed. **Transport and infrastructure** • As work on locations for growth progresses on both plans, cross boundary, location specific issues may arise including need for strategic transport	**Housing need and strategy** • SGC confirmed in its Local Plan Phase 3 - Emerging preferred strategy that it is intending to meet its housing need (Standard Method) in full and will not be asking B&NES to meet any unmet need. (Local Plan Phase 3 Section 3a) • That by using the same consultants, who have used the same methodology, this has resolved any potential issues regarding the identification of Local Housing Need for South Gloucestershire in relation to the other West of England Councils. A Local Housing Need Assessment (LHNA) summary document jointly commissioned by the West of England Councils provides further details. • Need to assess the potential impact of proposed housing sites in both authorities Local Plans on the adjoining authority and mitigation mechanisms to ensure any issues are resolved. **Employment Land need and strategy** • That the approach to addressing the employment imbalance in the Bristol East Fringe is supported	No formal response to Phase 4 consultation received	• No DtC issues have been raised by B&NES in relation to how SGC has sought to engage in the preparation of the SGC Local Plan to date. • SGC will advise and discuss with B&NES on how it has addressed matters raised in consultation responses prior to commencing its Reg 19 Local Plan Publication draft public consultation. This forms part of the Council's active, constructive and ongoing discussion with B&NES on strategic matters that cross administrative boundaries and on-going joint working integral to the production of a positively prepared and justified strategy. • SGC will look to agree a joint Statement of Common Ground (SoCG) with B&NES and BCC on strategic cross boundary and any bilateral matters, as required prior to submitting its Local Plan for Examination.

			and other infrastructure which will need close working and co-ordinated engagement as necessary.	as it should help to reduce commuting flows between South Gloucestershire and B&NES and the alignment of jobs and homes planned in SGC is positive for the sub region. **Transportation and infrastructure** • Further discussions are required on the cumulative transport impacts from development options at Keynsham, Saltford and Hicks Gate in B&NES (via the B&NES Reg 18 Local plan Options document) and the urban edge development locations identified in the East Fringe area in the SGC Reg 18 P3 Emerging preferred strategy consultation. Transport modelling approaches to support both Local Plans should continue to be shared and discussed to ensure that modelling of development and planned mitigation takes account of likely trips generated from growth planned in both UAs. • That continued joint working required to ensure that the provision of recreational spaces and education provision is provided to meet anticipated population growth within each authority as planned. **Renewable Energy** • That safeguarded wind energy development zones for larger scale wind energy development are not proposed close to the boundary with B&NES. B&NES would welcome further dialogue and engagement on the approach to renewable energy		

				and the evidence work undertaken, including landscape sensitivity work. **Nature recovery** • That further discussions are required on approaches to Biodiversity Net Gain (BNG) and any potential cross-boundary impacts and connection of strategic Green Infrastructure (GI) across our administrative boundaries. Opportunities for ongoing joint working on GI and the Local Nature Recovery Strategy (LNRS) are also noted.		
West of England Mayoral Combined Authority (MCA) and Local Economic Partnership (LEP) and Local Nature Partnership lead / **Adjoining authority**	No	No	The MCA is the Strategic Transport Authority as well as leading on the Local Enterprise Partnership and Local Nature Partnership.	In May 2022 work on the Spatial Development Strategy (SDS) was halted by the West of England Metro Mayor, as unanimous agreement on the plan could not be reached by all participating Councils. In the absence of an SDS, the MCA has recognised the need for its constituent authorities to develop their individual local plans to address both strategic and local planning issues.	No formal response to Phase 4 consultation received	• The three local plans being prepared by BCC, B&NES and SGC will provide the strategic planning policies in the MCA area. • The issue of housing need is being addressed through the individual local plans within the context of the duty to cooperate. • SGC will continue to engage actively and positively with the MCA to ensure any cross boundary strategic matters are identified and addressed collaboratively by all parties. • The MCA have a role to play in supporting the narrative on the vision and investment needed to support the delivery of the Local Plan. This will be particularly on matters for which the MCA has strategic responsibility such as transportation and the Local Nature Recovery Strategy (LNRS.) • SGC is continuing to keep the MCA officers updated on progress with preparing its new LP through the weekly Heads of Planning Policy (HoPP) meetings.

						• SGC transport officers supported by Atkins Realis briefed MCA transport officers on 2.12.24 in relation to the transport impacts and proposed mitigations associated with delivering the Plan's spatial strategy.
Wiltshire Council /**Adjoining authority**	No	Yes	At a meeting between officers in summer 2023 it was agreed that potential cross boundary issues related to. **Transport and infrastructure** • Potential impact of growth in proximity to the boundaries on the road network and on education, community and other infrastructure. No written response was received from WC at this stage.	At P3 Wiltshire Council raised potential cross boundary issues with the emerging preferred strategy relating to: • Green Belt –that the review relates to Bristol and SGC housing need and does not affect parts of the GB within Wiltshire but request to be updated on the GB review if any findings relate to Wiltshire. • Transport and infrastructure provision – noted that the M4 runs through Wiltshire but this is not acknowledged in the draft plan. Growth at Acton Turville may impact schools in Wiltshire. • Gypsy and Traveller provision. That the evidence and approach to meeting needs is welcomed. • It is suggested that Wiltshire is included in the strategic planning context for SGC in any future plan review.	At P4 Wiltshire Council welcomed that SGC is proposing to increase housing land supply and working towards providing a 10% buffer to provide flexibility and protect against any under delivery of the proposed strategy. Noted that whilst sites have not been found to entirely fulfil this 10% buffer the new sites do go some way towards providing that additional supply.	• No DtC issues have been raised by WC in relation to how SGC has sought to engage in the preparation of the SGC Local Plan to date. • SGC will advise and discuss with WC on how it has addressed matters raised in consultation responses prior to commencing its Reg 19 Local Plan Publication draft public consultation. This forms part of the Council's active, constructive and ongoing discussion with WC on strategic matters that cross administrative boundaries and on-going joint working integral to the production of a positively prepared and justified strategy. • SGC will look to agree a joint Statement of Common Ground (SoCG) with WC as required prior to submitting its Local Plan for Examination.
Stroud District Council/ **Adjoining authority**	Yes	Yes	**Housing need and strategy** • Potential issues relating to unmet need and the impact of growth in proximity to the boundaries of SGC and SDC	**Housing need and strategy** • SGC confirmed in its Local Plan Phase 3 – Towards a preferred strategy that it is intending to meet its housing need (Standard Method) in full and will not be asking Stroud DC to meet any unmet need. (Local Plan Phase 3 Section 3a)	No formal response to P4 consultation received	• No DtC issues have been raised by SDC in relation to how SGC has sought to engage in the preparation of the SGC Local Plan to date. • SGC will advise and discuss with SDC on how it has addressed matters raised in consultation responses prior to commencing its

			Employment land and strategy • Need to work collaboratively on the Severn Edge project at Oldbury and Berkeley. **Transport and infrastructure** • The DtC issue relates to working in partnership with transport and planning authorities and National Highways to ensure that the transport network can accommodate the housing and employment growth levels for SGC in a sustainable way which limits the need to travel, supports a choice of transport modes, makes the most of the existing strategic transport network and delivers mitigation where required. **Impact on education, community and other infrastructure.**	**Employment education training and skills** • That SDC and SGC continue to work together as partners in the Western Gateway sub-national transport body (STB) and Pan-regional Partnership including on the Severn Edge project which includes sites at Oldbury and Berkely. **Transport and Infrastructure** • That particular transport cross-boundary matters relate to: the opportunities for new public transport and cycling and walking connections on the South Gloucestershire/Stroud boundary; and existing and likely future capacity issues at M5 Junction 14 (located within South Gloucestershire). • That SGC, SDC and National Highways set up a system in 2018 to ensure that cross boundary transport impacts were assessed in development proposals. All parties continue to hold monthly liaison meetings. • That all parties have met with developers to discuss emerging Local Plans and speculative applications and identify potential mitigation and delivery mechanisms. It is agreed that to date SDC and SGC in preparing their Local Plans have engaged proactively and positively on strategic transport matters. • Within this context, there is a need for references in the SGC Local Plan to capacity issues at M5 J14 and the need for		Reg 19 Local Plan Publication draft public consultation. This forms part of the Council's active, constructive and ongoing discussion with SDC on strategic matters that cross administrative boundaries and on-going joint working integral to the production of a positively prepared and justified strategy. • SGC will look to agree a joint Statement of Common Ground (SoCG) with SDC on strategic cross boundary and any bilateral matters, as required prior to submitting its Local Plan for Examination.

			Green Infrastructure (GI) and nature recovery • Joint working is required to ensure that GI is integrated across the sub-region to maximise its benefits for biodiversity and people. SGC and SDC will continue to contribute to joint plans and projects with other partners on flood risk management. The councils will work together to assess, mitigate and manage impacts on the significant nature conservation interests in the estuary including through Habitats Impact Assessments.	improvements to strategic infrastructure including Charfield Station, the Greenway and public transport improvements and improvements to infrastructure related to the Severn Edge fusion proposal. • That further work is required to assess the impact and set out clearly the necessary infrastructure required for each strategic development and how it will be delivered. This will require working together and with National Highways and developers to determine appropriate infrastructure at M5 Junction 14 and associated roads, safeguard land to enable the intervention, detail the triggers and timing for interventions, and devise a funding and delivery strategy for identified improvements. **Severn Estuary** • Need for further joint working to ensure connectivity with the wider ecological and Nature Recovery Network and developing partnership working to review Severn Estuary visitor pressures, with potential to jointly produce a visitor survey and a future mitigation strategy for the Severn Estuary SAC, SPA, Ramsar.		
Gloucester-shire County Council **/**	Yes	Yes	**Transport and infrastructure**	**Minerals & Waste** • At P3 GCC confirm that there are no outstanding cross boundary	No further comments on archaeology, climate change, flood risk	• No DtC issues have been raised by GCC in relation to how SGC has sought to engage in the

Adjoining authority			• Potential cross boundary issues arising from the impact of proposed growth in Stroud and SGC on the local and national road network and public transport as well as impact on local services in communities in proximity to the boundary. **Nature Recovery** • Acknowledge and support strategic approach to delivering biodiversity net gain.	minerals and waste impacts arising from the SGC Local Plan **Transport and infrastructure** • That the impact of proposed levels of growth in proximity to Gloucestershire boundary (particularly in Charfield) on the local transport network in Stroud District and on M5 J14 should be modelled and traffic impacts of growth mitigated. Agree that these issues are recognised in P3 lenses and in Stage 1 and modelling evidence which supports P3. Detailed comments on the P3 transport modelling are being considered by SGC • That GCC will consider Stage 2 transport modelling work when it is available to understand and review evidence of impact of the preferred strategy on the road network in Gloucestershire including M5 J14, and what mitigation may go forward and ensure it takes account of planned growth in Stroud district. This will inform opportunities on joint working and cross border demand management measures to be delivered. • That P3 does not mention the Wotton to Charfield Active Travel Route which is in Gloucestershire's adopted Local Transport Plan and vital to walking and cycling connectivity and modal shift away from the private car. Would like a commitment to delivering this link to be identified and opportunities	management, minerals and waste planning or strategic planning. **Transport planning:** • Additional housing sites to meet Bristol's housing need may increase quantum of development in proximity to Gloucestershire. To understand and mitigate impact of meeting some of Bristol's housing need there needs to be additional transport modelling and application of tools such as Active Travel England's advice on what is needed for a development to be sustainable from a travel perspective. • The effects of development within SG will require mitigation within Gloucestershire itself and collaborative working between the planning and transport authorities is important. • Would like to explore options to link public transport and active travel along the A38 corridor between the two counties. Aside from J14, cross boundary bus & coach travel (utilising M5/A38 corridors) and/or improved rail services & frequencies will help encourage sustainable movements	preparation of the SGC Local Plan to date. • SGC will advise and discuss with GCC on how it has addressed matters raised in consultation responses prior to commencing its Reg 19 Local Plan Publication draft public consultation. This forms part of the Council's active, constructive and ongoing discussion with GCC on strategic matters that cross administrative boundaries and on-going joint working integral to the production of a positively prepared and justified strategy. • SGC will look to agree a joint Statement of Common Ground (SoCG) with GCC on strategic cross boundary and any bilateral matters, as required prior to submitting its Local Plan for Examination.

				to fund its delivery to be identified. • The issue of overcrowding on rail services has been discussed by transport officers of the two councils and is part of an extension to the MetroWest Phase 2 project.	between the two authorities and provide access to key employment areas i.e. Bristol, Cheltenham/Gloucester. • GCC seeks to discuss and collaborate on M5 J14 improvements fundamental to the success of developments in SG and Gloucestershire. Modelling shows that committed and proposed developments will cause congestion and safety issues. Significant improvements will be required without seeking to accommodate Bristol's need. This junction is a risk to growth ambitions and has significant cost implications. • Need to consider and plan to reduce impact on local road network in Gloucestershire from developments in SGC and take opportunity to progress the delivery of cross boarder Active Travel Route connecting Wootton Under Edge. • Supporting modelling evidence and its conclusions noted but the Local Plan Stage 1 Transport Report is to assess the impact of new developments only and the Stage 2 modelling work/report for potential solutions to the issues identified (for M5 J14) is yet	

					to be completed. Officers would welcome an opportunity to review Stage 2 once completed especially since more development may come forward to accommodate Bristol's unmet need.	
Forest of Dean/ **Adjoining authority**	Yes	No	**Housing need and strategy** • Potential cross boundary issue. **Economic Development** • Potential cross boundary issue **Transport and infrastructure** • Impact of development on traffic and congestion in Chepstow a potential issue. **Climate Change** • Potential for issues relating to the impact of climate change on the Severn Estuary/ May need to continue to cooperate e.g. through the Severn Estuary Recreation Study.	Ongoing strategic working through the Western Gateway sub-national transport body (STB) and Pan-regional Partnership on transport matters relating to the West of England and South East Wales.	No formal response to P4 consultation received	• No DtC issues have been raised by FoD in relation to how SGC has sought to engage in the preparation of the SGC Local Plan to date. • SGC will advise and discuss with FoD on how it has addressed matters raised in consultation responses prior to commencing its Reg 19 Local Plan Publication draft public consultation. This forms part of the Council's active, constructive and ongoing discussion with FoD on strategic matters that cross administrative boundaries and on-going joint working integral to the production of a positively prepared and justified strategy. • SGC will look to agree a joint Statement of Common Ground (SoCG) with FoD on strategic cross boundary and any bilateral matters, as required prior to submitting its Local Plan for Examination.

Cotswold District Council/ **Adjoining authority**	No	No	Response to Local Plan P2 consultation did not identify any cross-boundary issues.	No formal response to P3 consultation received	No formal response to P4 consultation received	• No DtC issues have been raised by CDC in relation to how SGC has sought to engage in the preparation of the SGC Local Plan to date. • SGC will advise and discuss with CDC on how it has addressed matters raised in consultation responses prior to commencing its Reg 19 Local Plan Publication draft public consultation. This forms part of the Council's active, constructive and ongoing discussion with CDC on strategic matters that cross administrative boundaries and on-going joint working integral to the production of a positively prepared and justified strategy. • SGC will look to agree a joint Statement of Common Ground (SoCG) with CDC on strategic cross boundary and any bilateral matters, as required prior to submitting its Local Plan for Examination.
Monmouth-Shire Council/ **Adjoining authority**	No	No	No formal response received	No formal response to P3 consultation received	No formal response to P4 consultation received	• No DtC issues have been raised by MC in relation to how SGC has sought to engage in the preparation of the SGC Local Plan to date. • SGC will advise and discuss with MC on how it has addressed matters raised in consultation responses prior to commencing its Reg 19 Local Plan Publication draft public consultation. This forms part of the Council's active, constructive and ongoing discussion with MC on strategic matters that cross administrative boundaries and on-going joint working integral to the

						production of a positively prepared and justified strategy. • SGC will look to agree a joint Statement of Common Ground (SoCG) with MC on strategic cross boundary and any bilateral matters, as required prior to submitting its Local Plan for Examination.
Environment Agency (EA)/ **Prescribed body**	Yes	Yes	Potential issues relating to flood risk and contamination were identified through on-going working between the EA and SGC.	In its response to P3 the EA provided advice on the approach to Strategic Flood Risk Assessment, the sequential test and site-specific policy criteria for mitigating flood risk. This included the approach to modelling, using Flood Zone 2 as a proxy to represent long term changes to Flood Zone 3, and comments on the approach to site specific mitigation criteria, coastal areas, Sustainable Drainage Systems, water quality, resources and consumption, climate change, biodiversity and planning for minerals. In addition, site specific comments were made relating to flood risk, site development criteria and mitigation and need for sequential approach on the following sites: • YA003 Yate Town Centre • EPS-CSCE4 Buffer depot, Acton Turville • EPS-PSB1 Land south of B4055 Easter Compton • EPS-FC14 Woodlands Golf Course, Trench Lane, Almondsbury • EPS-CSCE3 Land at Rushmoor Dairy, Badminton • EPS-BV12 Sawmills, Bath Road, Bridge Yate	The EA has identified the site allocations which are either within or near fluvial and tidal flood risk zones 2 and 3. These sites have also been screened for other environmental constraints including issues relating to former landfill sites. Site specific comments were made relating to flood risk, site development criteria and mitigation and need for sequential approach and other constraints on the following sites: SG985 - Land at Hambrook Lane, Stoke Gifford SG363 – Jarrats Yard, Oldland Common. SG399 – Land at Hambrook Business Park, The Stream, Hambrook SG978 – Land at Ladden Garden Village, Yate SG979 – Land at Leechpool, Yate SG963 – CEMEX Floors, London Road, Wick	• No DtC issues have been raised by the EA in relation to how SGC has sought to engage in the preparation of SGC Local Plan to date • SGC will advise and discuss with the EA on how it has addressed matters raised in consultation responses prior to commencing its Reg 19 Local Plan Publication draft public consultation. This forms part of the Council's active, constructive and ongoing discussion with the EA on strategic matters that cross administrative boundaries and on-going joint working integral to the production of a positively prepared and justified strategy. • SGC will look to agree a joint Statement of Common Ground (SoCG) with the EA on strategic cross boundary and any bilateral matters, as required prior to submitting its Local Plan for Examination.

				• EPS-CHAR5 Land north of Wootton Road, Charfield • EPS-PSB3 Land east of B4055 Pilning Station • EPS-BV13 – Land North of Lyde Green • EPS-THOR3 – Land west of B4061, Thornbury Site Specific comments in relation to the EAs regulatory functions re contamination were identified at the following sites. • EPS BV13 - Land North of Lyde Green – 3 activities permitted by EA under the regulations will require suitable mitigation as well as consideration of the Westerleigh Oil Terminal emergency plan. • EPS-FC14 - Woodlands Golf Course, Trench Lane, Almondsbury, (Woodlands Garden Village – Bagwood Farm Landfill site and Keyway (Gloucestershire) landfill deposit. • EPS-BV3 - Land at Shortwood – sewer from Shortwood Landfill site to be protected, SNCI, noise and air quality issues. • L3-FC2 - Land at Badminton Road Yate The northern part is adjacent to three activities permitted by the EA under the environmental permitting regulations. Park Mill Farm intensive pig unit, Magpie Metal and Waste Limited and Phoenix Green Solutions green waste composting facility would require suitable mitigation.		

				• L3-FC11 - Land at Beech Hill Farm Westerleigh Road Yate Is located on the former Sodbury RDC Rodford Landfill site. The EA holds limited records on the types of waste deposited at this site. Investigations would need to be made into the presence of landfill gas and ground stability.		
National Highways **(**NH)/ **Prescribed body**	Yes	Yes	NH and SGC have been working collaboratively and proactively during the LP preparation process to ensure that development proposals likely to impact on the strategic road network (SRN) are supported by a proportionate and robust transport evidence base. Given the potential impact on traffic at SRN junctions arising from new housing and employment development traffic there will be a need for mitigation options to be identified and delivered. The current position in terms of overall transport infrastructure and provision in South Gloucestershire was published for the Local Plan evidence for P3 https://beta.southglos.g	National Highways is a key stakeholder in the Local Plan process. SGC will continue to work closely with NH through the DtC on technical evidence and mitigation of any impacts on the SRN arising from the Plan. NH has outstanding concerns in relation to P3 on: • M32 J1 and M4 J19 – potential impact of new development on A432 corridor and Bristol East Fringe locations • M4 – impact in context of Severnside and North and East Fringe and noise impact on smaller allocations adjoining the motorway. • M4 – concern that proposed allocation at Woodlands Golf Course (L2-FC2) would require strategic scale interventions to enable safe access onto the strategic and local network. NH request that the imperative for the crossing of the SRN be discussed and agreed with NH as part of a planning application. • M5 – potential for development at Tytherington Quarry to require utilities infrastructure under the M5 would need to be discussed and agreed with NH	That the challenges faced in ensuring a sound Local Plan relate to: • **Growth impacting on the SRN** Paragraph 28 of DfT Circular 01/2022 is clear that the policies and allocations that result from plan-making must not compromise the SRN's prime function to enable long-distance movement of people and goods (DfT Circular 01/2022, paragraph 28) and Paragraph 108 of the NPPF is clear that transport issues should be considered from the earliest stages of plan-making. • **Constrained SRN in South Gloucestershire and the wider West of England – safety-first led approach** SRN junctions in South Gloucestershire and the wider West of England Mayoral Combined Authority area are already constrained at	• No DtC issues have been raised by NH in relation to how SGC has sought to engage in the preparation of the SGC Local Plan to date. • Both parties are continuing to work closely to seek to resolve the matters raised by NH to the P3 and P4 LP consultations regarded the potential impact of proposed new development impacting on Strategic Road Network (SRN). This forms part of the Council's active, constructive and ongoing discussion with NH on strategic matters that cross administrative boundaries and on-going joint working integral to the production of a positively prepared and justified strategy. • SGC will look to agree a joint Statement of Common Ground (SoCG) with NH as required prior to submitting its Local Plan for Examination setting out how both parties have worked closely together to resolve these issues.

			ov.uk/static/59f071ed0f Transport-Infrastructure Position Statement Topic Paper Dec 23	• M5J14 – NH has been working closely and collaboratively with Stroud DC and SGC to understand traffic, capacity and congestion issues at M5J14. NH has outstanding concerns about the impact of the proposed allocations at Charfield and welcomes recognition of this in P3. NH and SGC continue to work to identify an acceptable mitigation scheme for these proposed P3 allocations and agree that further allocations at Buckover would adversely affect the safety and operation of the M5J14. NH would not support further development in this area without further evidence and scheme of mitigation. • M5 J16 and 17 – it is noted that SGC recognises that these junctions are operating near capacity at peak periods and housing allocations at Almondsbury, the North Fringe and Severnside could exacerbate existing problems without mitigation schemes. • Further evidence on cumulative impact and mitigation schemes will need to be completed to support the Infrastructure Delivery Plan.	peak times. This can result in significant delays and queues extending onto the motorway mainline. Safety remains the first imperative of National Highways and will inform its response to the draft South Gloucestershire Local Plan and the supporting evidence base. • **Onus on LPA to demonstrate impacts can be mitigated – but need to meet the NH's satisfied tests** In collaboration with National Highways, SGC should identify any infrastructure and/or other interventions necessary to avoid planned development resulting in a severe or unacceptable impact on the safe and efficient operation of the SRN. National Highways will wish to be satisfied that any SRN infrastructure proposals identified to support Local Plan growth are deliverable, have been costed realistically, and that funding, partners and relevant processes are in place to enable the timely delivery of infrastructure, or that there is a realistic prospect that longer term investment can be secured within the timescales envisaged.	

Bristol, North Somerset and South Gloucestershire (BNSSG) Integrated Care Board (ICB). (formally the Health Services Commission Board/ **Prescribed body**	Yes	Yes	Bristol, North Somerset and South Gloucestershire Integrated Care Board (BNSSG ICB) is responsible for commissioning the majority of hospital and community NHS services in the local area. BNSSG ICB also has delegated commissioning responsibility from NHS England (NHSE) for commissioning primary care service. SGC and the BNSSG ICB held regular meetings and exchanged information during 2023 to understand processes and funding and this is summarised in the infrastructure delivery statement evidence for P3 NHS General Practice (GP) Services Infrastructure Position Statement Topic Paper Dec 23	BNSSG ICB raised following issues in P3 response (please also see NHS Property Services response which is complementary) • Residential development has significant impacts for primary healthcare provision. Planning and funding for the healthcare needs of new development should be at the forefront of priorities for new infrastructure delivery working closely with the NHS. This should be set out clearly in the Plan. • Effective implementation mechanisms are important to ensure delivery alongside new development. An initial indication of the primary healthcare infrastructure required to support the Plan's housing growth has been provided in the Infrastructure Position Statement and an overview of the total amount of investment required has been provided in P3 response. The ICB will collaborate with the council on delivery of appropriate facilities. • A mechanism for securing developer contributions for healthcare infrastructure is required. This should be included in the Viability Assessment process. • The plan should support alternative uses on	No formal response to P4 received, however the BNSSG ICB have continued to engage with SGC in the preparation of the Infrastructure Delivery Plan and modelling the impacts of the LP emerging spatial strategy on the delivery primary health care in SGC.	• No DtC issues have been raised by BNSSG ICB in relation to how SGC has sought to engage in the preparation of the SGC Local Plan to date. • Both parties are continuing to work closely to seek to resolve the matters raised by BNSSG ICB to the P3 LP consultation with regard to proposed new development impacting on the commissioning of primary care NHS services in the local area as part of preparing the Infrastructure Delivery Plan (IDP) to support the SGC LP. This forms part of the Council's active, constructive and ongoing discussion with BNSSG ICB on strategic matters that cross administrative boundaries and on-going joint working integral to the production of a positively prepared and justified strategy. • SGC will look to agree a joint Statement of Common Ground (SoCG) with BNSSG ICB as required prior to submitting its Local Plan for Examination setting out how both parties have worked closely together to mitigate impacts of the plans policies and proposals on primary healthcare.

				healthcare facilities which have been declared surplus. • The need for affordable homes for NHS staff should be factored into housing requirements. • NHS property could benefit from carbon offset funds to help get to net zero. • The planning system should recognise impacts on the wider determinants of health such as active travel through Health Impact Assessments and a wide range of good design principles.		
Historic England (HE)/ **Prescribed body**	Yes	Yes	**Strategic Issue** The significance of the historic environment should be sustained and opportunities for enhancement fully considered. Heritage assets should be conserved in a manner appropriate to their significance.	Historic England (HE) is a key stakeholder in the Local Plan Process. SGC will continue to work closely with them on technical evidence and mitigation of any impacts arising from the Plan. HE recognises the consideration that has been given to the historic environment in developing P3 but has outstanding concerns in relation to: • For some proposed allocations the impact may be significant and it is not clear how any new development could respond positively to the affected heritage assets as required by national policy. Further evidence is required to provide the necessary explanation before the principle of allocation is established. A heritage impact assessment should identify impact on the asset,	HE recognises the challenge in finding suitable sites and the attention and care that has been taken to safeguard historic character and protect the integrity of SGs heritage assets. Topic Paper para 9.2, however, gives the impression that this historic environment has not been given equal consideration as the Green Belt, AONB and flooding. To achieve a sound plan it will be important to demonstrate that this is not the case. It would be helpful to emphasise that the NPPF expects great weight is applied to the conservation of historic assets and that this is no lesser weight than conserving and enhancing National Landscapes. There	• No DtC issues have been raised by HE in relation to how SGC has sought to engage in the preparation of the SGC Local Plan to date. • SGC recognises the need to provide sufficient assurance to HE that the Reg 19 LP is fully in conformity with the NPPF with regard to ensuring great weight is applied to the conservation of historic assets, and to statutory duty to have special regard to preserving a listed building and any features of historic interest under S6 of the Planning (LB and Conservation Areas) Act 1990 and S72 relating to Conservation Areas. • SGC is undertaking the necessary and proportionate technical work to provide HE with the assurance that proposed new allocations identified in their P3 and P4 consultation responses can respond positively to the affected heritage assets as required by national policy. This forms part of the Council's active,

					where mitigation is suitable (including significant changes to the design and scale of the proposal) or where harm is unavoidable and the principle of the allocation should be reconsidered. The following sites require this process: Acton Turville (ESP-CSCE2) Easter Compton (ESP-PSBAI), Almondsbury (ESP-SV9), Alveston Down (ESP-SV2), Charfield (ESO-CHAR5) requires a Setting Assessment, Hanham (EPS-HA1 and HA3), Engine Common (EPS-FC9), Siston (EPS-BV6 and BV9), Thornbury (EPS-Thor3).The identification of areas for renewable energy safeguarding has not been informed by consideration of heritage assets or landscape. Therefore the policy must be clear how great weight will be applied to safeguard heritage assets and their settings ensuring wind turbines are located in the right locations.	is also a statutory duty to have special regard to preserving a listed building and any features of historic interest under S6 of the Planning (LB and Conservation Areas) Act 1990 and S72 relating to Conservation Areas. This is so that the historic environment is considered as important and strategic as Green Belt, flooding and AONB and also to ensure “great weight” is applied to appropriately minimise harm and optimise heritage benefits. HE notes that the SA (July 2024), indicates at para 2.22 page 37, that the new additional sites “have not been subject to assessment by SG Council officers”. This suggest the conclusions of the SA may not be adequately informed. It is presumed that the outstanding heritage assessment, particularly of site SG363 Jarratt’s Yard and SG399 Hambrook Business Park will take place and the findings shared, to help inform, and demonstrate, their suitability and where that principle is considered acceptable, then any	constructive and ongoing discussion with HE on strategic matters that cross administrative boundaries and on-going joint working integral to the production of a positively prepared and justified strategy. • SGC will look to agree a joint Statement of Common Ground (SoCG) with HE as required prior to submitting its Local Plan for Examination setting out how both parties have worked closely together to mitigate impacts of the plans policies and proposals on the heritage assets of South Gloucestershire.

					appropriate and required design response.	
Natural England/ **Prescribed body**	Yes	Yes	**Strategic Cross Boundary Issues** • MCA authorities and others must work together at a local and strategic level to protect and enhance nationally and internationally designated sites, landscapes, priority and irreplaceable habitats in line with legal and national policy requirements. • GI is a strategic and cross boundary issue and should be listed alongside other essential infrastructure and properly planned from the outset • Detailed comments on how LP should approach irreplaceable habitats and designated sites in DTC and in relation to BNG • Public rights of way may warrant inclusion as a	Natural England is a key stakeholder in the Local Plan process. SGC will continue to work closely with them on technical evidence and mitigation of any impacts arising from the Plan. NE has outstanding concerns raised in relation to P3 as follows: • Impact of recreational pressure on the Severn Estuary. Evidence base requires further work • Core Sustenance Zones for BATs (CSZ) -The distance used in HRA is too low in context of recommended guidance in Somerset Council (8km.) Recommends we revisit assumptions and evidence behind linked foraging habitats and CSZs. Potential significant implications for East Fringe. • Water Quality – Acknowledged that there will be more pressure on Sewage treatment due to population growth, do not consider that there is evidence of nutrients to be harming Severn Estuary. • Further work required to consider impact of wind energy on Severn Estuary. • Recommend Council leads master planning on all sites in GI corridors. • Site specific comments and recommendations on a	No formal response to P4 consultation received	• No DtC issues have been raised by NE in relation to how SGC has sought to engage in the preparation of the SGC Local Plan to date. • Both parties are continuing to work closely to seek to resolve the matters raised by NE to the P3 LP consultation regarding confirming that through safeguards within LP policy and other mitigation, it will be possible to avoid adverse effects on the integrity of Severn Estuary SAC/SPA/Ramsar and its functionally linked habitats (birds, fish); and functionally linked habitats associated with the Chew Valley Lake SPA (birds), River Wye SAC (fish), River Usk SAC (fish), Wye Valley & Forest of Dean Bat Sites SAC (bats) and Bath & Bradford on Avon Bats SAC (bats). This forms part of the Council's active, constructive and ongoing discussion with NE on strategic matters that cross administrative boundaries and on-going joint working integral to the production of a positively prepared and justified strategy. • SGC will look to agree a joint Statement of Common Ground (SoCG) with NE as required prior to submitting its Local Plan for Examination setting out how both parties have worked closely together to resolve these issues.

			cross boundary matter. **Evidence** • Agree WEMP nature recovery mapping is key evidence • For HRA the SGLP will be assessed alone and in combination with other relevant plans. **Working together** • Welcome more regular and structured arrangements for officer liaison as plan progresses. Especially in relation to HRA. **Other comments** It may be possible to mitigate for impact on Severn Estuary if tackled strategically e.g. better visitor management and investment in existing green spaces.	number of sites within the emerging preferred strategy (Charfield, Almondsbury, Pilning, Easter Compton, Woodlands, East Fringe, Hanham). • Stressed need to follow national guidance on major developments within AONBs for all proposed Cotswold National Landscape allocations (Wick, Marshfield, Acton Turvill). **Renewables** • Likely harm to Severn Estuary SPA through MWA1, needs full consideration through HRA. • Unhappy with wind safeguarding in Cotswold National Landscape. **Minerals** • Concerned by proposal to re-open Cromhall quarry, due to harm to SSSI. May need to formally de-designate SSSI. • No great concerns over Tytherington expansion **Specific comments for following draft policy areas:** • Adaptation and Climate • Renewable Energy Systems • Community Energy • Gypsy and Travellers • Minerals • Economy		

The Civil Aviation Authority/ **Prescribed body**	No	No	No strategic cross boundary issues identified	No strategic cross boundary issues identified	No formal response to P4 consultation received	• There are no strategic cross boundary issues presently outstanding. • This will be kept under review through the remaining stages of preparing the SGC Local Plan and if appropriate SGC will look to agree a joint Statement of Common Ground (SoCG) prior to submitting its Local Plan for Examination.
Homes England **Prescribed body**	No	No	No strategic cross boundary issues identified	No strategic cross boundary issues identified	No formal response to P4 consultation received	• There are no strategic cross boundary issues presently outstanding. • This will be kept under review through the remaining stages of preparing the SGC Local Plan and if appropriate SGC will look to agree a joint Statement of Common Ground (SoCG) prior to submitting its Local Plan for Examination.
Office of the Rail Regulation (Rail and Road) **Prescribed body**	No	No	No strategic cross boundary issues identified	No strategic cross boundary issues identified	No formal response to P4 consultation received	• There are no strategic cross boundary issues presently outstanding. This will be kept under review through the remaining stages of preparing the SGC Local Plan and if appropriate SGC will look to agree a joint Statement of Common Ground (SoCG) prior to submitting its Local Plan for Examination.
Marine Management Organisation **Prescribed body**	No	Yes	No strategic cross boundary issues identified	The Marine Management Organisation (MMO) response to P3 raised the following: • Need to take note of any relevant policies within the South West Marine Plan documents in regard to areas within the South Gloucestershire Local Plan that may impact upon the marine environment. Specifically:	No formal response to P4 consultation received	• In preparing the Reg 19 Publication draft the matters raised by the MMO have been considered and addressed. • There are no strategic cross boundary issues presently outstanding. • This will be kept under review through the remaining stages of preparing the SGC Local Plan and if appropriate SGC will look to agree a

				○ Climate Change Policy: SW-CC-1 – re natural capital solutions ○ Infrastructure Policy: INF-1 - re planning coastal defences ○ SW-SCP-1, SW-BIO-1, SW-BIO-2, SW-BIO-3 - Reference to seascape and biodiversity in blue green GI corridors ○ Employment policy: SW-EMP-1 re needs of coastal communities ○ Water Policy SW-WQ-1 – re potential for mine water development • Currently the MMO is mentioned within the Local Plan in relation to offshore renewable energy developments. This should be amended to reference to MMO jurisdiction as all marine areas, whether inshore or offshore, need to be considered by the MMO under our South West Marine Plan • Marine Plans need to be taken into consideration under the 'Energy Management in New Development' section within the local plan.		joint Statement of Common Ground (SoCG) prior to submitting its Local Plan for Examination to confirm that relevant strategic matters have been addressed in the SGC LP.
Wessex Water/ **Key stakeholder**	Yes	Yes	Wessex Water provides sewerage services in SGC area, taking wastewater for treatment in Waste Recycling Centres. A programme of current and upcoming	The Wessex Water (WW) response to P3 raised the following: • Detailed specific comments received on sites included in emerging preferred strategy identifying the upgrades and investment which may be required to enable wastewater treatment for these sites. No	No formal response to P4 consultation received	• Both parties are continuing to work closely to seek to resolve the matters raised by WW to the P3 LP consultation with regard to proposed new developments impacting on the treatment and handling of sewerage services in SGC area as part of identifying the development principles to support site allocations and

			schemes is provided in a 5-year business plan. Wessex works with local planning authorities to identify where new capacity will be required in terms of network and capacity of Wast Recycling Centres. SGC and Wessex Water held regular meetings and exchanged information during 2023 to understand processes and funding and this is summarised in the infrastructure delivery statement evidence for P3 Sewerage (Wessex Water) Infrastructure-Position-Statement-Topic-Paper Dec 2023	strategic "showstopper" issues identified. • Advised that these comments may affect site design and capacity to some extent with more significant potential issues (not "showstoppers") on sites at Charfield and Woodlands Golf Course but are not considered to be strategic cross boundary matters. These comments are matters of soundness which will be considered and dealt with through Local Plan site allocation and Infrastructure Delivery Plan process.		through preparing the Infrastructure Delivery Plan (IDP) to support the SGC LP. • SGC will look to agree a joint Statement of Common Ground (SoCG) with WW as required prior to submitting its Local Plan for Examination setting out how both parties have worked closely together to mitigate impacts of the plans policies and proposals on the treatment and handling of sewerage services in SGC area.
Bristol Water/ **Key stakeholder**	No	No	Bristol Water is the principal provider of water supply infrastructure in South Gloucestershire. SGC and Bristol Water held meetings and exchanged information during 2023 to understand processes and funding and this is summarised in the infrastructure delivery	No strategic cross boundary issues identified	At P4 Bristol Water, as Statutory Water Undertaker, commented that the level of development proposed in the BCC & SGLP areas have the potential to have a significant impact on the water supply network. It is therefore critical to promote and secure sustainable water usage. The Plans draft policy approach to water	• SGC will look to engage further with BW and to agree a joint Statement of Common Ground (SoCG) as required prior to submitting its Local Plan for Examination setting out how both parties have worked closely together to mitigate impacts of the plans policies and proposals on the water supply network in SGC area.

			statement evidence for P3 Water (Bristol Water) - Infrastructure Position Statement Topic Paper Dec 23		efficiency in new buildings is strongly supported and could be expanded to include suitable water efficiency standards across different development types and scales. In addition, high level comments were made relating to the suitability of the infrastructure and required improvements to accommodate the proposed allocations. Of these 17 sites 14 can be accommodated within the existing water supply network and infrastructure. Two sites will have medium impact and will require upgrades to the network. • SG979 Land at Leechpool, Yate • SG963 CEMEX Floors, London Road, Wick One site at SG363 Jarrats Yard, Oldland Common is expected to pose high impact on the water distribution network and will require circa 1km of upgrades. In addition, there is a strategic trunk water main crossing the site which will need to be incorporated or diverted at the developers cost.	

Wales & West Utilities/ **Key stakeholder**	No	No	Wales & West Utilities provides the gas infrastructure distribution network for South Gloucestershire. SGC and Wales & West Utilities held meetings and exchanged information during 2023 to understand processes and funding and this is summarised in the infrastructure delivery statement evidence for P3 Gas (Wales & West Utilities - Infrastructure Position Statement Topic Paper Dec 2023	No strategic cross boundary issues identified	No formal response to P4 consultation received	• There are no strategic cross boundary issues presently outstanding. • This will be kept under review through the remaining stages of preparing the SGC Local Plan and if appropriate SGC will look to agree a joint Statement of Common Ground (SoCG) prior to submitting its Local Plan for Examination.
National Grid Energy Distribution (NGED)/ **key stakeholder**	Yes	Yes	National Grid Energy Distribution NGED is responsible for distributing electricity from the transmission grid to homes and businesses in South Gloucestershire. SGC and NGED held regular meetings and exchanged information during 2023 to understand processes and funding and this is summarised in the infrastructure delivery statement evidence for P3 Electricity (National Grid Electricity	The National Grid Energy Distribution (NGED) response to P3 raised the following: • general principles for development that retain high voltage lines in situ, above ground. Undergrounding should be avoided wherever possible, and any proposals should be subject to engagement with NGED to ensure feasibility. • Potential issues at the 5 sites in the emerging preferred strategy and listed below, where 132Kv overhead pylons are present. Technical advice on this issue including that priority should be given to retaining overhead lines wherever possible.	In addition to the general points raised at P3 NGED raised points on two of the additional sites. • SG363 – Jarrats Yard, Oldland Common • SG979 – Land at Leechpool, Yate Both sites are affected by 132kV overhead lines which traverse through the centre of the development sites. NGED also requested that that SGC continues to provide timely information	• Both parties are continuing to consider the 7 sites identified to ensure site layout, capacities and NGED network safeguarding are compatible, and site policies acknowledge presence of lines and to confirm LPA's preference that these are retained in situ. • This will be kept under review through the remaining stages of preparing the SGC Local Plan and if appropriate SGC will look to agree a joint Statement of Common Ground (SoCG) prior to submitting its Local Plan for Examination.

			Distribution) Infrastructure Position Statement Topic Paper Dec 32	○ **Easter Compton** - EPS PSB4 and EPS PSB1 and EPSPSB2 ○ **North of Lyde Green** – EPSBV13 ○ **Land to the rear of Park Farm, Barry Road, Oldland Common** – EPS BOC1 ○ **Lower Shortwood** – EPSBV9 ○ **Woodlands** – EPS-FC14	to ensure that planned growth is included in the Distribution Future Energy Scenario.	
National Grid Energy Transmission/ **key stakeholder**	No	Yes	National Grid Energy Transmission is the high voltage electric power transmission network connecting power stations and major substations. It is separate from the local distribution networks that connect directly to homes and businesses.	The National Grid Energy Transmission (NGED) response to P3 raised the following: • Proposals on land crossed by NGET infrastructure requires a creative approach to design of new development around high voltage overhead lines and other NGET assets. NGET should be involved in policies or site specific proposals which could affect it assets. • LPP3 sites Tytherington Quarry Southwest 2 and 3 are crossed by or in close proximity to NGET sites. This needs to be acknowledged in any policy with a requirement for a strategy to respond to the overhead transmission lines present within the site which demonstrates that the NGET Design Guide and Principles have been applied appropriately	No formal response to P4 consultation received	• Both parties are continuing to ensure proposals on land crossed by NGET infrastructure takes a creative approach to design of new development around high voltage overhead lines and other NGET assets. • In preparing the Reg 19 Publication draft the matters raised by NGED have been addressed. • This will be kept under review through the remaining stages of preparing the SGC Local Plan and if appropriate SGC will look to agree a joint Statement of Common Ground (SoCG) prior to submitting its Local Plan for Examination.

Avon and Somerset Police/ **Key stakeholder**	No	Yes	SGC worked with the Police during 2023 to understand funding process and potential requirements arising from new development. Set out in P3 evidence in a Policing Infrastructure Topic Paper	Existing police stations within South Gloucestershire are already at capacity and so there is a need for expansion to provide for the Local Plan proposed additional dwellings. Information was provided on the costs of additional infrastructure associated with addition dwellings and proposals that these costs should be met by developers.	No formal response to P4 consultation received	• Both parties are continuing to work closely together to seek to ensure matters raised in the P3 response in relation to funding to support new development will be addressed through the Infrastructure Delivery Plan for allocations. • This will be kept under review through the remaining stages of preparing the SGC Local Plan and if appropriate SGC will look to agree a joint Statement of Common Ground (SoCG) prior to submitting its Local Plan for Examination to confirm that relevant strategic matters have been addressed in the SGC LP.
Avon Fire and Rescue/ **Key stakeholder**	No	No	No formal response received.	No issues of soundness identified	No formal response to P4 consultation received	• There are no strategic cross boundary issues presently outstanding. • The Council notes no formal response was received through the Regulation 18 consultation stage. • This will be kept under review through the remaining stages of preparing the SGC Local Plan and if appropriate SGC will look to agree a joint Statement of Common Ground (SoCG) prior to submitting its Local Plan for Examination.
Network Rail/ **Key stakeholder**	No	Yes	Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main	The Network Rail (NR) response to P3 raised the following: • Strategic & Major Sites Delivery Policy -Network Rail will expect developers to assess impact on level crossings, suggest and fund mitigations. • Commented on recent permissions and proposed site allocations in Charfield in Lens 3	No formal response to P4 consultation received	• SGC will continue to work closely with NR on the matters raised in their response to the P3 consultation in particular the level crossing issue at Charfield, the comments on delivery of rail improvements in developing preferred strategy and the requirement for land to be safeguarded at Westerleigh Junction.

			rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure. The position in terms of overall transport infrastructure and provision in South Gloucestershire was published for the Local Plan evidence for P3 https://beta.southglos.gov.uk/static/59f071ed0f Transport-Infrastructure Position Statement Topic Paper Dec 23	and the Emerging Preferred Strategy in relation to concerns about mitigating the impact of increased misuse and trespass relating to the existing level crossing. A solution is required to divert the PROW and provide a new footbridge. • YA003 – North of Ladden Garden Village. This site is proposed for 162 residential homes next to the railway. The allocation should consider the noise and vibration impacts which will need to be assessed. • NR supports drive to increase use of public transport. However, advised on the likelihood of future rail connectivity at the following locations: Pilning Station – no assumption the current circumstances will change. Winterbourne – no assumption that a new station could be delivered here. Lyde Green North – no assumption that a passenger service could be delivered here. Will continue to work with SGC on first/last mile travel initiatives to encourage rail usage. • NR is planning improvements at Westerleigh Junction so land should be safeguarded in this area for future use. Outline designs have been submitted to the Council. • New development around Parkway Station will deliver schemes which will support active travel.		• SGC is continuing to keep NR officers updated on progress with preparing its new LP through quarterly liaison meetings. • This will be kept under review through the remaining stages of preparing the SGC Local Plan and if appropriate SGC will look to agree a joint Statement of Common Ground (SoCG) prior to submitting its Local Plan for Examination.

Cotswold National Landscape (CNL) Board **Key Stakeholder**	N/A	Yes	NA	The Cotswold National Landscape (CNL) Board response to P3 raised the following: • Concern that the housing requirement has been identified as a target which is too high given the large proportion of the district which is covered by the CNL and its setting (24% plus 10%) in the context of recent changes to the NPPF. • Support for the emerging preferred strategy over the alternative three lenses. • Supports some development within the CNL and its setting through the Local Plan in principle (in preference to windfall development). • Provided detailed comments on each of the proposed sites indicating the extent to which each is supported by the CLN board including identifying the need for further evidence and assessment on: local housing needs, landscape sensitivity, traffic impact and major development assessment prior to allocation to justify exceptional circumstances. • Provided detailed development policy criteria for each site. PS-CSCE1 Hawkesbury Upton, EPS-CSCE2, EPS - CSCE4, EPS-CSCE5 – Acton Turville, PS-CSCE3 Badminton, EPS-BV1, EPS-BV2 EPS-BV4 EPS-BV8 – Wick, EPS-BV13 0 Lyde Green, EPS-BV14 Goose Green, EPS -CHAR5,EPS - CHAR6 Charfield	The Local Plan evidence base should give explicit consideration to the statutory duty to further the purpose of conserving and enhancing the natural beauty of the CNL, including whether: (i) this purpose has been furthered; and (i) this duty has been met. Support the recognition given to the fact that the application of policies for protecting areas or assets of particular importance, such as the CNL, may limit the extent to which: (i) SG's objectively assessed needs can be met in full; and (ii) SG can assist in meeting Bristol City Council's unmet needs. Raised concerns about the HELA and SA processes in relation to understanding how the CNL has been considered through these processes. Considered it is essential to undertake an assessment of whether each site allocation in the CNL constitutes major development and if so where exceptional circumstances apply.	• In response to comments made to Phases 3 and 4 the Strategic Green Infrastructure policy was modified. • SGC will continue to liaise with the CNL Board on the matters raised in their response to the P3 and P4 consultations and in particular the need for the Plan's spatial strategy to identify sustainable development in the CNL to assist delivering the homes needed in the district over the plan-period and to support the Council's carbon net zero objectives. • This will be kept under review through the remaining stages of preparing the SGC Local Plan and if appropriate SGC will look to agree a joint Statement of Common Ground (SoCG) prior to submitting its Local Plan for Examination.

				• Objected to approach to renewable energy opportunities within the CNL and its setting. In particular the identification of suitable areas for solar and wind which should be underpinned by a Landscape Sensitivity assessment. Advised that the identification of suitable areas and safeguarding areas should not be conflated. • Requested a new CNL policy to cover all new developments within the CNL including 50% AH on market housing and 100% on rural exception sites.	Provided detailed comments on the proposed sites indicating the extent to which each is supported by the CLN Board including the need for further evidence and assessment on: local housing needs, landscape sensitivity, traffic impact and major development assessment prior to allocation to justify exceptional circumstances. Recommend that an LVSA should also be undertaken for two of the additional sites that have been brought forward in the topic paper: • SG936 (CEMEX Floors, Wick – 45 dwellings), which is adjacent to the CNL boundary. • SG363 (Jarrat's Yard, Oldland Common – 225 dwellings), which comes within approximately 1.7km of the CNL boundary. For site SG936,the LVSA should include an assessment of cumulative impacts of all the proposed allocations at Wick.	
Nuclear De-Commissioning Authority (NDA)/ **Key Stakeholder**	N/A	Yes	N/A	The Nuclear De-Commissioning Authority (NDA) response to P3 raised the following: • As the NDA responded to P1 and P2 with comments made on the proposed nuclear policies in P1, as this policy is not subject to	No formal response to P4 consultation received	• The Council will continue to work with the NDA on the issues raised in their responses to the LP consultation to further discuss and develop the Council's policy approach to Oldbury Nuclear Site as part of

				further consultation in P3 the NDA has limited comments to make at this time. • However, request opportunity to discuss continued drafting of policies relating to Oldbury Nuclear site in advance of Reg 19. Areas of importance are: the NDAs continuing ambition and commitment to the decommissioning of the site and to ensure a policy framework which seeks to protect the existing nuclear assets.		continuing to prepare the SGC LP. • This will be kept under review through the remaining stages of preparing the SGC Local Plan and if appropriate SGC will look to agree a joint Statement of Common Ground (SoCG) prior to submitting its Local Plan for Examination.
NHS Property Services / **Key Stakeholder**	No	Yes	N/A	The NHS Property Services (NHSPS) response to P3 raised the following: (please also see BNSSG ICB response which is complementary) • Planning and funding for the healthcare needs of new development should be at the forefront of priorities for new infrastructure delivery working closely with the NHS. • Effective implementation mechanisms are important to ensure it is delivered alongside new development • Where healthcare facilities are formally declared surplus to the operational requirements of the NHS there should be no requirement to retain any part of sites for alternative community uses. • AH policies should consider affordable homes for NHS staff	No formal response to P4 consultation received	• Both parties are continuing to work closely to seek to resolve the matters raised by NHSPS to the P3 LP consultation with regard to proposed new development impacting on the commissioning of hospital, community and primary care NHS services in the local area as part of preparing the Infrastructure Delivery Plan (IDP) to support the SGC LP. • SGC, BNSSG ICB and NHS Property Estates officers held a joint workshops in July and Nov 24 in relation to considering the LP's emerging spatial strategy and assessing its impact on primary healthcare requirements. • SGC will look to agree a joint Statement of Common Ground (SoCG) with NHSPS as required prior to submitting its Local Plan for Examination setting out how both parties have worked closely together to mitigate impacts of the plans policies and proposals on primary healthcare.

				• P3 Site allocations: EF010 Downend Clinic, NF009 Filton Clinic and TH001 Thornbury Clinic allocations should enable full redevelopment for residential use if declared surplus to NHS requirements in the future. • Healthcare infrastructure should be part of viability assessment process and in the IDP.		

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