



## **Draft questionnaire responses to the Phase 2 consultation of the South Gloucestershire Local Plan from Frampton Cotterell Parish Council**

### **Introduction**

#### **1. Understanding who is responding**

Town & Parish Council

### **Urban Lifestyles**

#### **2. Emerging Urban Lifestyle Areas and Density Policy**

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

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

~~Yes/No/Don't know~~

It is difficult to assess this approach as there appears that no impact assessment has been carried out and how the infrastructure is going to cope, if and how biodiversity gain will be achieved and any measures to combat climate change.

Frampton Cotterell Parish Council opposes low density parking and believes alternative solutions to parking should be considered, such as on rooves, underground including communal underground parking or safe secure parking courts. Reliable, frequent transport infrastructure should be part of any development and be in place before any dwellings are occupied to reduce pollution. This must include the expansion of the Metrobus network out to Yate which would be a vital prerequisite if current densities are to be substantially increased whilst urban parking standards are relaxed. Without significant improvements to the frequency and reliability of public transport across the authority residents in South Gloucestershire will remain overly reliant upon private motor vehicles. The road network would become increasingly congested and disruptive parking would become more prevalent. Air quality would also decline (more noxious air in built up areas) whilst our collective efforts to decarbonise the regional economy would fail.

Apartments should all have access to private amenity space (in the form of a balcony or garden). If Policy CS24, governing the provision of public open space, is to be relaxed the requirement for all dwellings to have access to functional and satisfactory private amenity space is of critical importance for the health and wellbeing of inhabitants. At present developers of flats justify the failure to meet the amenity standards required under Policy PSP43 on the grounds that there is sufficient public open space in the vicinity. If developer contributions are to be spent on improving/beautifying urban streetscapes this justification must be explicitly excluded by revising the wording of PSP43.

### **3. Urban Lifestyles - Locations and Sites**

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

Don't know, as the current evidence is not enough to see the implications, again an impact assessment is required to assess the areas affected and how climate change will be combated and biodiversity gain will be achieved. A judgement cannot be made until this information is available.

### **4. Urban Lifestyles - Safeguarded Employment Areas**

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

Don't know, as the detail is required to see the implications, again an impact assessment is required to assess the areas affected and how climate change will be combated and biodiversity gain will be achieved.

There appears to be the potential for serious conflict between the adopted Yate Town Improvement Masterplan and the new Local Plan. Policy CS12 currently safeguards employment land in the predominant form of Class B usage. If an applicant wants to change the accepted use of a site away from Class B they need to meet the requirements set out in CS12. The Yate Masterplan, however, envisages the future of the Western Gateway of Yate as having "space for community and mixed land uses that provide increased and new employment types and commercial uses." If the Western Gateway is to remain safeguarded for employment the revised wording of the policy should be sufficiently flexible; it must not be so restrictive that it precludes the type of future development outlined within the adopted Masterplan.

### **Creating Sustainable Rural Villages & Settlements**

#### **5. Community - Led Growth**

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

SGC should be working with all communities to identify local needs and designs. Frampton Cotterell and neighbouring Coalpit Heath have had a substantial amount of housing development. A high number of parishioners In a recent parish council consultation indicated that they do not want any more housing in the area that would reduce the green belt and green sites generally. A minority of respondents, however, raised the pressing need for genuinely affordable housing within the parish as the current lack of affordable housing forces the younger generation to move away from the area. The Frome Valley is an essential resource providing a public amenity for people in Frampton Cotterell and for visitors from within SGC and Bristol with a rich experience of nature and walks in the countryside (which helps their mental and physical health).

Rural Exception Sites have a role to play in shaping the future growth of rural communities. If the Local Plan attributes growth ranges to rural settlements, however, Rural Exception Sites should contribute towards that growth. They should not be considered as extra development that does not contribute towards the growth ranges outlined in the plan.

Neighbourhood Plans are not fit for shaping the development of rural parishes. The cost, in both time and resources, is not outweighed by the supposed benefits especially when Neighbourhood Plans must be consistent with higher level planning documents (including any requisite growth ranges). It can take five or more years of hard work to get a Neighbourhood Plan successfully adopted. Core elements of that Neighbourhood Plan, however, can be rendered outdated and meaningless by updates to a Local Plan, Regional Plan or the NPPF (which all take precedence over it). Those core elements of a Neighbourhood Plan, which would have been adopted with the broad support of the community, can suddenly become redundant without the wishes of the community being properly taken account for.

## **6. Developing a Strategy for Growth in our Rural Villages and Settlements**

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

Yes/No/Don't know

The Parish Council have consulted the community about their views on the future of our area. The majority of parishioners who chose to respond stated they do not want any further development as this will have an adverse impact on biodiversity, the character of the village and the ability of local services to cope. Local transport infrastructure is under a lot of pressure due to traffic congestion so more housing would add to this, along with added air pollution. A minority of respondents, however, did raise the pressing need for genuinely affordable housing within the parish; children and grandchildren cannot afford to settle down within the area so they have to move farther away to areas with more affordable housing. An increasing portion of greenfield sites are being employed for inefficient land uses such as solar farms. This trend should not continue as there will not be any greenfield areas left and this would be a huge loss to the community.

## **7. Developing a Strategy for Growth in our Rural Villages and Settlements**

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

Yes/No/Don't know

The Parish Council have consulted the community about their views on the future of our area and the majority of parishioners who chose to respond stated they do not want any further development as this will have an adverse impact on biodiversity, the character of the village and the ability of local services to cope. Local transport infrastructure is under a lot of pressure due to traffic congestion so more housing would add to this, along with added air pollution. A minority of respondents, however, did raise the pressing need for genuinely affordable housing within the parish; children and grandchildren cannot afford to settle down within the area so they have to move farther away to areas with more affordable housing. An increasing portion of greenfield sites are being employed for inefficient land uses such as solar farms. This trend should not continue as there will not be any greenfield areas left and this would be a huge loss to the community.

The majority of parishioners who chose to respond also expressed strong opposition, to any more building on greenfield sites because of their value for recreation, nature and climate change amelioration. We also have the Frome Valley coming through our village which should be protected

as a biodiversity corridor but that protection should cover a wider area than currently outlined within the consultation document.

We are already a heavily congested area as our roads carry a huge load of traffic passing through the area (e.g. Church Road and Bristol Road). Further development will increase the environmental impacts of road congestion, emissions pollution, health conditions, noise and risks to pedestrians and cyclists.

Frampton End Road was closed to through traffic between Frampton Cotterell and Iron Acton after a 700+ strong petition was presented to SGC about 8 years ago. It is now only used by pedestrians, horse riders and cyclists. It is a narrow, windy single carriageway rural lane passing through the tranquil Frome Valley and is much loved by local residents of all ages and abilities in both Frampton Cotterell and Iron Acton parishes and further afield.

Any significant future development in this area would seriously detract from the nature of this delightful rural country walk and the enjoyment of the flora, fauna and our local heritage.

## **8. Planning Policies for Other Rural Issues**

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

There should be more emphasis placed on people's quality of life in SGC, and more on the impacts of planning policies on climate change and biodiversity. The policy should encourage those that work the land to do so in a way that encourages biodiversity way and influence them to enhance climate and nature improvements.

Current Policy CS34, relating to rural areas, is not strong enough as there is no way of measuring how applicants comply or do not comply with the policy. This needs to be significantly overhauled without being overly reliant upon technical jargon that residents would struggle to comprehend. One of the critical flaws with this consultation document is that it is too far too technical for residents (most of whom are laypeople when it comes to professional planning terminology). The main points should be in plain English so residents know what they are being asked and can decide what their views would be.

The NPPF doesn't actually recognise the farming situation today. People can grow a significant amount on a small area of land without necessarily generating a reliable/regular business income. In those circumstances they do not meet the criteria, under Policy PSP41, for an agricultural dwelling. This should be rectified.

Part of the plan should be about farming and food production, as this country imports a huge amount of food and we should be looking to produce more in Britain, using good quality land that can produce crops, rather than this land being built upon. We should also encourage farming methods such as regenerative farming and agroecology that create more biodiversity and enhance carbon sequestration in the soil.

## Developing a Strategy for Renewable Energy

### 9. Renewable Energy

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

Yes/No/Don't know

The big overall aim should be to reduce the use of carbon in the SGC area to help tackle climate change and this can be achieved in a variety of ways as outlined below. If we managed this there would be less pressure on the whole area to cover it with solar panels. The SGC map of potential sites seems to practicably have every single field targeted for solar farms.

It's really important to have a plan for renewable and sustainable energy which should be a balanced approach and include improving farming methods, planting more trees, rewilding and better hedgerow management. All these can result in significant carbon sequestration as well as dramatic increases in biodiversity. It is well evidenced that improving biodiversity and the natural environment, will also reduce the impacts of climate change.

SGC should insist that all new developments should have solar panels and use air source heat pumps; this should include extensions and particularly industrial buildings (existing and new).

We need to balance the use of land for photovoltaics with using the land to absorb more carbon to reduce the carbon in the air.

There should be better public transport including improved frequency and reliability so that car use is reduced. Housing should be improved to reduce the need to use so much energy.

There should be an audit of all the car parks to see whether they could have solar panels installed on the rooves and canopies.

All developments should prove that they are not suitable for other non-carbon heating. SGC should look into ground source community heating - sharing hot water out of the ground with a group of houses. There are precedents for this as this is done on the continent.

All alternative technologies and solutions have not been included in the consultation. Why is this? SGC and others should be considering and investigating all possibilities for the next 10-20 years, learning from within our own country and other countries as well.

There should be a balanced approach, reducing the use of greenfield sites and investigating the alternatives ruthlessly to ameliorate climate change in a variety of ways.

As a country we need to be more self-sufficient with food production and not overly reliant on importing our food, which increases carbon via transportation requirements. So we need to retain our farmland for this purpose.

Battery storage should be on brownfield sites and close to the production site.

## 10. Solar Energy

**If you have any land you would like to submit please complete a Renewables Call for Site Form available here**

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

~~Yes/No/Don't know~~

The SGC map seems to practically have every single field targeted for solar farms, it is not appropriate to cover all green fields with solar panels, other alternatives should be considered. SGC need to balance the use of land for photovoltaics with using the land to absorb more carbon to reduce the carbon in the air. Brown belt areas should also be considered for solar not just in fields.

SGC should insist that all new developments should have solar panels and use air source heat pumps, this should include extensions that increase the number of bedrooms in a property and particularly industrial buildings. Any new development sites should be designed and orientated to maximise solar gain, as solar panels work best on South and East to West properties.

There should be an audit of all the car parks to see whether they could have solar panels installed on the roofs and canopies. SGC should be assisting to make it more straight forward and affordable to have solar panels installed on all roofs.

We may generate more sustainable energy through solar farms, for example, but by changing farming methods to sequester more carbon there can also be a transfer of carbon from the air to the soil. Tree planting, hedge laying, distributing organic matter, organic farming methods and rewilding can all result in significant carbon sequestration as well as dramatic increases in biodiversity. It is well evidenced that improving biodiversity and the natural environment, will also reduce the impacts of climate change.

## 11. Wind Energy

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

**If you have any land you would like to submit please complete a Renewables Call for Site Form available here**

*To answer this you have to click on the map.*

The emphasis should be on investing in renewable technologies first and prove that these cannot be used before going back to fossil fuel fed systems.

Wind farms can impact the ecological stability of an area, especially AONBs, SSSIs, conservation areas and land with a variety of habitats. This means that not all locations will be suitable but if measures are taken to reduce the impact of wind farms as much as possible then there could be support from local communities and it is important to talk to them before considering any planning applications.

## 12. Community Energy Proposals

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

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

Community based energy companies should be encouraged and explored via SGC and parish council policies. These companies should be promoted to all residents so they are aware of the alternatives and how they can access them, including schemes that provide affordable solar panel installation, air-sourced heat pumps and other sustainable energy options.

## 13. Strategic Green Infrastructure Network

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

*To view the Green Infrastructure Network, please use the interactive map*

There is one of the biodiversity corridors right through Frampton Cotterell, namely the Frome Valley Corridor; this should be enhanced and development should be kept away from it, as if there is any disruption to the ecology of the area there will be an adverse effect on biodiversity, especially the extensive species referred to in detail in the Frampton Cotterell Local Climate & Nature Action Plan (which is included as a link in question 20) that have wide ranges and territories, such as Peregrine Falcons and bats (we have both of these in the area, including a huge variety of bat species). A recent article in the Frome Valley Voice titled Frampton Cotterell Nature stated that 1,500 linnets, 60 skylarks and 40 yellow hammers have been seen at Frampton End this year. This is the largest count of linnets ever recorded in South Gloucestershire and skylarks, yellow hammers and linnets are on the UK red list because of steep declines in their population and are considered priority species.(the article is included as an attachment in question 20). It is vital that this area is protected and not adversely affected by any future development so these species can thrive in the Frome Valley. Otter spraints have also been found along the riverbank through the Parish and as otters are a protected species we need to limit disturbance to their territories. The Frome Valley is used by Frampton Cotterell residents but also the wider community including people from the rest of South Gloucestershire and Bristol who enjoy the area for recreation, exercise, nature and wildlife.

The Strategic Green Infrastructure Network is welcomed ecologically, but these areas should be protected and not be destroyed by taking a strong position against inappropriate development and preventing any harmful development within the area around them as well as within them.

There should be more links between different branches of the strategic green infrastructure network, to allow species to move between areas and they should be integrated more with reforestation. The best approach would be to genuinely improve biodiversity through the use of reliable measures and prevent the continuing decline in species that we currently have.

Some areas of woodland on the map do not seem to be covered by the strategic Green Infrastructure Network and it does not make much sense to leave them out.

There should be stricter guidance on how the land is farmed to combat climate change and by using methods like regenerative farming which will have a huge biodiversity gain.

## Draft Planning Policies

### **14. Strategic Green Infrastructure & Environment**

**Do you agree with our proposed policy approach?**

~~Yes/No/Don't know~~

This is a very good policy in principle but does not go far enough as biodiversity gain is not all-encompassing enough. There is still a reference to new housing development in the corridors and biodiversity is unlikely to be achieved if this is not changed. There is concern that the biodiversity net gain matrix does not measure species, it measures habitat and it ignores the soil which can hold an enormous amount of carbon as well as biodiversity. These things should be taken into consideration.

The policy does not account for the areas immediately surrounding the corridors. The sites are not in isolation, as ecological systems are complex and rely on interconnections over very large areas.

SGS should be investing in natural solutions, such as wetlands and reed beds which can reduce the sewage outflow problems, purify polluted water and significantly increase the absorption of carbon. These measures can effectively help climate change and biodiversity

### **15. Houses in Multiple Occupation (HMOs)**

**Do you agree with our proposed policy approach?**

~~Yes/No/Don't know~~

Yes

Although there may be an impact on people's mental and physical health if dwellings are too close together.

### **16. Urban Lifestyles and Density**

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

~~Yes/No/Don't know~~

The key consideration should be the quality of life for residents not just about theoretical density. Communities should be able to express their own views at the earliest possible stage as local knowledge would be key in judging if proposals are suitable or not. People should have access to safe open space and have a say in the design of their properties.

More clarity is required on what these statements mean, as it is difficult to make judgements and understand the underlying principles and what criteria, methodology and processes that will be used to assess how sustainable an area is.

The policy should state minimal use of greenfield sites rather than just reducing our overall reliance on greenfield sites.

Recent research has identified 65 mitigations for biodiversity used by developers but only 13 have any effect at all. The others either have no effect or actually worsen biodiversity.

<https://besjournals.onlinelibrary.wiley.com/doi/10.1002/2688-8319.12089>

We need to stay clear of greenfield sites as much as possible, especially those that are identified as being rich in biodiversity and those that have the potential to become so. There needs to be informed policy making using the research that is available.

Any large developments should have a frequent, reliable transport infrastructure plan first before dwellings are occupied.

There is no assessment of how high-density housing will impact on people's health & wellbeing. The consultation document is too vague and very general. It needs to be more specific about what the council's commitments are and what the prerequisites for development will be.

## **17. Biodiversity Net Gain**

### **Do you agree with our proposed policy approach?**

~~Yes/No/Don't know~~

Agree, but it is not strong enough; relying on the mitigation hierarchy in the biodiversity gain matrix is insufficient. If there is more harm to biodiversity than gain then the area should not be developed. It should not be the case that the developer mitigates in another area, it should be within the vicinity of the development site for BNG to have meaning.

As the biodiversity net gain is based upon the habitat, but not species, it is an incomplete assessment of the area; the species need to be considered as well through the range of accumulated data available. If rare species have been identified in the area, then those areas need strong protection from harmful development. At present the planning system seems to be biased in favour of development and against the conservation of precious ecosystems.

More information relating to the extensive species in the Frampton Cotterell area is included in question 20.

## **18. Rural Exception Sites and Community Led Rural Housing**

### **Do you agree with our proposed policy approach?**

~~Yes/No/Don't know~~

There are a series of problems in the proposals that mean we cannot support the overall policy.

"These plans would be separate to growth being investigated through the Local Plan for allocations in certain rural communities." Why? If a Parish Council has identified land where affordable housing can be built then there is no reason why this should not be regarded as a contribution to the total number of houses that are being built within the County. We need to think of the local community, taking into account their views. Frampton has already contributed significantly in providing development areas.

There is a contradiction between this advice and the exception mentioned later on in the document, namely:-

-“Will avoid harm to key environmental, landscape and national policy designations and considerations, including flood risk, Green Belt and the Cotswolds Area of Outstanding Natural Beauty; “ and “Where a community wants to bring forward such a scheme in the Green Belt for new homes which are not primarily for local affordable need, a Neighbourhood plan provides an opportunity to make changes to the Green Belt to facilitate development of a local housing site, subject to meeting other requirements of national Green Belt policy.” You cannot have a “no harm” clause which states an important principle, only to allow its reversal in certain circumstances.

“The placement, scale and design is appropriate to the nature of the village/ settlement and will respect the character and setting of that village/ settlement;” This is very important.

“It has clear support from the appropriate parish council through evidenced consultation and supported affordable housing needs survey.” This is also essential.

Rural Exception Sites have a role to play in shaping the future growth of rural communities. If the Local Plan attributes growth ranges to rural settlements, however, Rural Exception Sites should contribute towards that growth. They should not be considered as extra development that does not contribute towards the growth ranges outlined in the plan.

Neighbourhood Plans are not fit for shaping the development of rural parishes. The cost, in both time and resources, is not outweighed by the supposed benefits especially when Neighbourhood Plans must be consistent with higher level planning documents (including any requisite growth ranges). It can take five or more years of hard work to get a Neighbourhood Plan successfully adopted. Core elements of that Neighbourhood Plan, however, can be rendered outdated and meaningless by updates to a Local Plan, Regional Plan or the NPPF (which all take precedence over it). Those core elements of a Neighbourhood Plan, which would have been adopted with the broad support of the community, can suddenly become redundant without the wishes of the community being properly taken account for.

It should look at sustainability and the range of services in the area and the impact on transport, schools, doctors’ surgeries etc.

## **19. Management and Maintenance of Public Open Space**

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

Yes/No/Don't know

This principle would be a most welcome development provided that town/parish councils are consulted at an early stage of the planning process and thereafter. Town and parish council should be able to shape the development of public open space plans in a manner that does not prejudice their stance within the planning process. A town/parish council may need to publicly oppose a planning application, as they are representing the views of their parishioners, but still be able to comment on the designs for public open space without this being construed as the council accepting the broad principle of the application. Town/parish councils should be provided with reliable information about the likely annual maintenance costs so that they can make informed budgeting decisions and are adequately prepared to cover those costs once the period of financial contributions from the developer comes to an end.

Town and Parish Councils should be involved at an early stage in what the public open space will look like and should be asked if they are willing to take on new public open spaces if SGC is not prepared to maintain them before a developer or maintenance company is considered.

## **20. Any Other Questions/Technical Questions & Uploads**

**Please let us know if you have any other comments on the Phase 2 documents, or background evidence**

**If you have any comments on the Phase 2 sustainability appraisal please use the questionnaire available here**

The consultation should be more accessible, not all areas could be accessed initially and it should all be in Plain English with less jargon and references to complex policies and processes. This would enable people to understand what the main issues are and what is going to be decided.

Frampton Cotterell Parish Council are requesting for a meeting to be held with SGC to discuss devolving SGC owned land such as Park Farm play area, Glebe land and Ridings to FCPC.

### Background evidence

A recent article in the Frome Valley Voice referred to the number of birds species and the priority species in the Frome Valley (copy attached)

The Frampton Cotterell Local Climate & Nature Action Plan 2021-2024 provides a wealth of information which is relevant for the Local plan phase 2 consultation and includes a species list and ecology report which highlights habitats, species and areas of interest in Frampton (Link attached).

[Frampton Cotterell Local Climate & Nature Action Plan 2021-2024](#)