

Frampton Cotterell Parish Council

Response to :-SGC-Local Plan Phase 3 Consultation

1. Understanding who is responding

- Parish Council

2. Council Priorities & Local Plan Objectives

Comments on the South Gloucester Council's priorities and Local Plan objectives?

Frampton Cotterell Parish Council:

- Welcomes the idea of addressing the twin challenges of the climate and nature emergency and the cost of living crisis is a good one
- Strongly endorses the commitment to work towards the achievement of carbon net zero to help tackle the global climate and nature emergencies; the Parish Council's position is to place this at the centre of our decision-making, South Gloucestershire Council should be doing the same and the commitment should not be to 'work towards,' but to achieve net zero? This should clearly refer to the SGC area, not just to SGC's own emissions.
- The plan emphasises the importance of green and blue infrastructure and nature recovery, South Gloucestershire Council should go beyond the minimum requirement for 10% biodiversity net gain, there should be a more ambitious target, at least 20%, as increasing biodiversity from a green field by 10% is too easy, as baseline biodiversity is generally minimal
- Are very pleased to see the climate and nature emergencies identified as a priority. Delivering nature recovery and re-establishing functioning ecosystems is an essential part of mitigating and adapting to climate change. Ensuring nature's recovery should be identified as a key objective. The plan should include more detail about how nature recovery and public access to nature will be delivered. To support the nature recovery ambitions in the West of England Joint Green Infrastructure Strategy it should include specific and measurable targets and ambitions. To support 30x30 the plan should seek to dramatically increase the amount of land which is protected and managed for nature.
- welcomes the commitment to meet the needs of all groups in the community and to do so by optimising density and locating development in the most sustainable places;
- agrees with the focus on accessibility of homes and jobs, schools and other facilities and the emphasis on supporting active lifestyles, travel minimisation and decarbonisation. However there should be employment before development. Sustainable housing to meet communities' needs is fine but more focus is needed on providing affordable homes and how to do this. The focus on the East Bristol Fringe is good, as the area is sometimes ignored by local government in favour of other areas.
- recognises the importance of increasing local job opportunities for South Gloucestershire residents as well as improving access to the wider job market, and of promoting sustainable enterprises that will contribute to the achievement of the goals above;
- Making a positive contribution to the physical and mental health of local residents should be an objective.

3a Planning for Economy & jobs

Comments made on the interactive map regarding the 2 urban option sites which are on safeguarded employment areas:-

Frampton Cotterell Parish Council:

- agree with the argument that we need to do more for the East fringe of Bristol in terms of employment opportunities. Planning for a green future requires more thought to be given to creating imaginative and practical solutions for jobs in the area. SGC should look at how to link future jobs to the existing facilities at Bristol & Bath Science Park.
- Assuming these are the areas at Filton, UWE, Staple Hill and Kingswood (section 3b 43), it's worth maybe worth noting that all of these are probably further than most active commuters would want to travel, and none have direct public transport links to Frampton. Except possibly the Filton site, but that's on or near the unfeasibly slow Y6 route. All the others require bus changes, so Frampton residents working in these areas would have to use cars to commute unless public transport links are upgraded. However, this likely applies to most employment zones in SG (except Yate and Emersons / Lyde Green with upgraded cycle infrastructure).

3b Planning for Economy & Jobs

Comments made on the interactive map regarding the 2 proposed site allocations which are on safeguarded employment areas:-

The Parish Council believe these area should be safeguarded for employment

3c Planning for Economy & Jobs

Comments made on the interactive map regarding SGC proposal to continue safeguarding these areas for employment:-

The Parish Council believe these area should be safeguarded for employment

4 Planning for Town Centres

Comments made on the interactive map regarding SGC proposed updates to the primary shopping area and wider town centre:-

Frampton Cotterell Parish Council:

- agree with the broad tone of the plan and decision to protect, enhance and update the primary shopping area and wider town boundaries and to increase the capacity of Yate Railway Station and facilities around it. Residents of Frampton Cotterell rely on services in Yate for shopping, employment, schooling, leisure and transport
- Big improvements for active travel on Station Road are needed to encourage Frampton Cotterell commuters to cycle and train into Bristol, or cycles to the shops in Yate centre.
- Strongly support the work being done on importance of public houses within local communities and agree with the review of policy PSP34.
- The issue of vacant retail units needs to be addressed properly (especially in Yate Shopping Centre).
- Garden centres should be protected from redevelopment
- would like to see more flexibility and imagination on what a town centre needs to be in the next decades – should be less zoned and more mixed use, mixing residential, retail, hospitality, sports facilities and flexible workspaces to allow space to be easily reassigned according to emerging future needs, while ensuring that it doesn't become a ghost town if one or more of those sectors falls over.

5a Planning for Infrastructure

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 SGC would welcome views, particularly from developers & infrastructure providers on how infrastructure could be brought forward in a more timely way during the development process.

Response:-

Frampton Cotterell Parish Council:

- agree that planning for infrastructure is of key importance. How this fits in with our climate emergency pledge is crucial here. 'Active Travel,' liaising with other councils and our metro-mayor is important.
- Broadly support most of the key infrastructure projects that are planned.
- Consultation with local people about what projects they would like to see in their local area could be a good idea moving forward.
- notes and welcomes plans for further sustainable transport investment along the A432 by 2026, for increased capacity at Yate Railway Station, and for enhanced flood defences and green infrastructure on the river Frome. Unfortunately, problems with the A432 bridge over the M4 may delay the benefits of work on the A432 – and currently is contributing to greatly increased congestion with consequent dangerous 'rat running' and speeding through Beesmoor Road and Park Lane.
- Active travel and public transport needs to be a coherent and dense network (taking priority over cars where possible in urban areas particularly), or there's no incentive to choose it instead of driving. Active travel infrastructure in particular, is only successful where it forms a network of high quality, safe infrastructure. Piecemeal bits of infrastructure which stop and start – like the current disconnected track between (nearly) Coalpit Heath and (nearly) Yate - or which are hard to follow will not encourage modal shift at the scale required by net zero targets (and the physical need to drop emissions drastically).
- Permission for any new development should be contingent on developers building safe active travel infrastructure which joins the development to the wider network (not a bit of shared path which stops at the edge of the development, - e.g. Heather Ave / Beesmoor Rd shared path to nowhere).
- As part of flood mitigation on the Frome, South Gloucestershire Council should consider the use of 'soft' bio-engineering solutions which may be less costly than hard engineering fixes, increase biodiversity and prove more resilient in the long term.
- This should include the enhanced biodiversity net gain requirements which should be higher than 10%, they should be at least 20%.

5b Planning for Infrastructure

SGC have to understand development economics in order to ensure infrastructure, where needed, is affordable and deliverable. SGC 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).

Response:-

The Parish Council supports this approach.

6a Urban Areas & Market Towns

Comments made on the interactive map on the individual sites on any of the 15 proposed urban or market town site allocations:-.

The Parish Council view is that it is much better to mix in housing where there are already services and infrastructure available, although there is the risk of less amenity space and over development.

6b Urban Areas & Market Towns

Comments made on the on the individual sites on the 2 proposed urban allocations with options for different uses:-

The Parish Council supports that allocation of sites for housing option. The need for affordable housing – maybe as a percentage of overall capacity at each site should be specified. There are national precedents in this area. Filton Airfield site must be seen as a key site moving forward due to its location and capacity. However the Parish Council feel that health centres should be safeguarded and not included as mix use.

7. Towards a Preferred Strategy

Comments made on the interactive map on SGC emerging preferred strategy & individual sites:-

Response:-

Frampton Cotterell Parish Council:

- Overall view is that the 15-year plan is bold and ambitious. Sub-headings seem logical. The detail shown is impressive it breaks down exactly where the new housing development will be built. The reference to existing and future transport infrastructure seems well thought out. The sites for the larger developments seem sensible and the protection for our green belt follows sound logic. The key will be in implementing the preferred strategy will be in tying in the new development to transport links and ensuring enough affordable housing stock is built.
- Frampton Cotterell Parish Council has previously made clear its opposition to development in the Green Belt, and in particular to any development within Frampton Cotterell or Frome Valley Green Belt areas. It is pleased to see that the proposals would largely avoid development in the latter. It continues to hold the view that Green Belt development should be avoided wherever possible, and in particular ad hoc speculative proposals for building in the Green Belt.
- The only development that is acceptable in the Green Belt is on brown field sites. Any development that takes place in the Green Belt must be replaced by the same amount of space added contiguous to the existing Green Belt.
- There is concern that the plan does not currently make provision for potential demand from neighbouring authorities, including Bristol, and this may mean that sub-regional need will eventually push these numbers higher
- Potential conflict between climate and nature imperatives and development
- All the three other 'lenses' considered in the course of developing a preferred strategy would be worse, primarily in emissions/transport & sustainability terms. A 'hybrid' strategy appears most likely to provide the most sustainable route to meeting housing, employment and infrastructure needs in South Gloucestershire.

8. Strategy Lens: No Green Belt Loss

Comments made on the interactive map on the No Green Belt Loss strategy lens and on the individual sites:-

Response:-

Frampton Cotterell Parish Council support this Lens. The Green Belt ensures the remaining countryside provides countryside accessible to residents of the urban areas, prevents towns and villages joining up, losing their individual identities. So much development has already taken place in and around Frampton Cotterell Parish preventing further urbanisation is a higher relative priority, particularly in view of current lifestyles and the opportunities provided by the new technologies

However the Parish Council are wary of building new homes in the Yate/Sodbury area as there does not appear to be adequate infrastructure to cope with this, the Severnside area would be better.

9. Strategy Lens: Urban Edge

Comments made on the interactive map regarding the Urban Edge strategy lens and on the individual sites:-

Response:-

Frampton Cotterell Parish Council thinks this lens offers the best strategy for development in South Glos (providing there is no loss to the Green Belt). The focus on development of the Severnside area and the East-Bristol fringe is something which we support. The only main concern would be the risk of flooding along the Avonmouth/Severn Beach coastline and whether appropriate thought has gone into protecting new homes and businesses.

10. Strategy Lens: Transport Corridors & Hubs

Comments made on the interactive map regarding the Transport Corridors, Hubs strategy lens and on the individual sites:-

Response:-

Frampton Cotterell Parish Council:

- The link between jobs and transport hubs/infrastructure is key here, it is crucial that sustainable local travel is encouraged and give communities the opportunity to use this. The lack of employment opportunities in rural areas such as Frampton Cotterell and Coalpit Heath is a challenge which doesn't have any easy answers. This lens does not offer any real insight/workable solutions to the issues raised.
- This lens proposes development in places surrounding Frampton Cotterell and Coalpit Heath which are key sites for local biodiversity and public access to nature. The development proposed by this lens would further add to the pollution of the River Frome. This strategy would be a complete disaster for biodiversity and public access to nature in this area.
- L3-FC17 Land to the East of Bristol Road This site includes Black Rocks Field, which is a key site for biodiversity with a wide range of priority habitats and species. The significance of this site has been set out in detail in the proposal for a Frampton Cotterell Nature Reserve. The site is important for public access to nature and nature education. This year the Black Rocks nature trail leaflet was published, with a circular walk around Black Rocks Field and the Centenary Field.
- L3-FC3 Land at Roundways and L3-FC1 Land East of Coalpit Heath These are the main areas for public access to nature for residents on this side of the village. The area contains significant hedgerows, and populations of priority farmland birds including Skylarks and Yellowhammers. It includes existing woodland and part of the mapped woodland network.

The Parish Council are in agreement with the response from Iron Acton Parish Council and the Frampton Cotterell Nature group.

11. Planning for Gypsies Travellers & Travelling Showpeople

Comments on the proposed approach for Gypsy, Traveller & Travelling Showpeople sites for safeguarding made on the interactive map:-

Response:-

Frampton Cotterell Parish Council support safeguarding existing authorised sites. Given that some of the sites are within the Green Belt which limits the time of stay: the proposal to remove the sites from the Green Belt would be an acceptable approach to the problem provided that the sites are safe guarded and the Green Belt is extended outward around the sites.

12. Planning for Renewable Energy

Comments made on the interactive map regarding the areas proposed for wind safeguarding:-

Response:-

The target to become carbon neutral by 2030 is bold and admirable. Frampton Cotterell Parish Council fully agree with SGC sentiments and aims in this and think the ideas outlined are sound and well-reasoned. However SGC need to be bolder on wind and solar energy in order to increase the overall percentage of our energy that comes from renewable sources. Community-owned renewables to provide financial and social benefit to communities and reduce resistance to renewable projects should be actively encouraged. SGC will need to alleviate the communities concerns regarding battery storage not causing a fire hazard.

Land should be safe guarded for this purpose, however the Parish Council strongly agree that it should not be at the expense of agricultural land, as it would be counterproductive.

13. Minerals

Comment made on the interactive map for the sites proposed for minerals allocation:-

The reasons for the approach are understood and supported, although 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. It does not appear to state that the amount of aggregate mined per annum will be limited to prevent overworking of the site and therefore loss of supply for the planned life of the resource.

14a. Strategic GI Corridors, Strategic Viewpoints & Visually Important Hillsides

Comments made on the interactive map regarding the proposed Green Infrastructure corridors, or overall Strategic Green Infrastructure Network:-

Frampton Cotterell Parish Council strongly support these policies; the maps however lack easily identifiable features such as the River Frome. These ideas seem well thought out and will help to protect green areas and rural communities, hopefully preserving wildlife, the natural environment and the rural way of life for future generations,

Frampton Cotterell Parish Council:

- welcomes the continued commitment to an enhanced green and blue infrastructure strategy and the increased emphasis on nature recovery.

- welcomes the plans to use the benefits of the new biodiversity net gain provisions to protect and enhance the Strategic Green Infrastructure Network – although this should not be at the expense of gains local to new development where this is feasible.
- supports the call by the Frampton Cotterell Nature Group for going beyond the minimum 10% biodiversity net gain, it should be at least 20% wherever feasible.
- The primary purpose of the green infrastructure network should be to support nature recovery in South Gloucestershire, but it should also lead to significantly improved public access to the benefits of nature, open spaces and opportunities for exercise.
- Development within the Strategic Green Infrastructure Network should be limited and must be subject to conditions which ensure considerable gains for biodiversity, connectivity and public access to nature. The SGIN corridors should be altered to ensure easy public access to the areas prioritised for biodiversity investment.
- The open areas to the north of Frampton Cotterell and east of Coalpit Heath should be included in the network, as these are significant areas for biodiversity, connectivity and public access to nature. We are particularly concerned that the area surrounding Frampton End Farm has not been included in the SGIN
- This is an opportunity when the LNRS is being prepared to ensure that ambitious plans are made to the maximum extent of DEFRA regulations. It is very disappointing to note that this offers no protection from development given that implementation will potentially waste resources, including financial, that could have been more usefully applied elsewhere. The use of statutory protections e.g. SSSI, SNCI etc should be applied as soon as the relevant criteria is reached and resources should be diverted to prioritising those areas that have the potential to achieve this.
- The proposals do not make any mention of how WECA links with our neighbours, Gloucestershire and Wiltshire, which seems to be a significant missed opportunity. Also an important area to the East seems to have been omitted, extending toward Westonbirt in Gloucestershire and Castle Combe in Wiltshire.
- The identification and safeguarding of GI corridors, Strategic viewpoints, and visually important hillsides is supported.
- would like to see the revision of some of the boundaries within or near the parish to include more land important to the creation and protection of areas of high biodiversity value and/or potential.
- concern about SGC spending money to improve the environment only for it to be built on at a later date. Areas of scientific interest should be protected and prioritised.

Frampton Cotterell Nature Group has submitted response to the consultation which is fully endorsed by the Parish Council.

14b. Strategic GI Corridors, Strategic Viewpoints & Visually Important Hillsides

Comments made on the interactive map regarding the proposed Strategic Viewpoints:-

Response:

The reference to Harris Barton in relation to viewpoints is unclear

14c. Strategic GI Corridors, Strategic Viewpoints & Visually Important Hillsides

Comments made on the interactive map regarding the proposed Visually Important Hillsides:-

Response:

The reference to Harris Barton in relation to viewpoints is unclear

15. New Local Plan Policy Framework- approach to Adopted Policies

Comments on the proposed range of new Local Plan Policies?

Response:-

Frampton Cotterell Parish Council welcomes the planned updating, revision and addition of relevant policies in the new local plan to bring it up to date with current challenges and ensure it complies with national planning policy.

The Parish Council would like to see a Nature Recovery policy which includes:

- 20% Biodiversity Net Gain for all new developments.
- Specific and measurable targets and commitments.
- A rewilding policy which proactively supports the reintroduction of lost species.
- Plans to maximise public engagement with citizen science to ensure that planning is based on up to date and accurate ecological data.
- The identification of specific sites and areas for nature recovery.
- Plans to improve public access to nature

The Parish Council supports the consultation response from the Frampton Cotterell Nature Group.

Draft Planning Policies

Comments on the following 14 Draft Planning Policies

16. Climate Change Mitigation, Adaptation & Resilience

- Yes- The Parish Council agrees with the proposed policy approach

Response:-

Frampton Cotterell Parish Council strongly support the changes provided it includes all new development to minimise its climate and environmental impact and for the development to be designed to be resilient to the effects of climate change. Especially insistence on BREEAM standards and comprehensive consideration of both embodied and in-use emissions, plus requirements for assessment involving future projections, not current state. Also the fabric and passive design requirements. Since all new buildings will still be in use by 2050 – and will by then need to be net zero or negative emissions-compatible, it makes no sense to build anything which is not to this standard. This approach avoids expensive future retrofits, with associated further financial and carbon costs. This should be absolutely non-negotiable, but likely needs national policy back up to be fully effective

17. Economy & Jobs

- Yes- The Parish Council agrees with the proposed policy approach

Response:-

Frampton Cotterell Parish Council has a slight concern on point 5 (ensuring parking, suitable access for cars etc).

This does not seem compatible with WECA's aim to significantly reduce regional car mileage by 2030 (more parking induces more traffic); encouraging more car use will also make it harder to achieve SGC's net zero

targets. The Council would prefer the requirement for access to be linked to more sustainable transport options (i.e. better public transport, active travel, micro mobility options etc). Otherwise we risk building in path dependency based on unsustainable modes, which will need to become obsolete or much reduced as the Plan period progresses (i.e. personal cars). Given trends for home / flexible working, transport as a service etc, it should not be assumed that current modes of travel will still be appropriate in 2030, let alone 2040. Why not encourage workplaces to share their existing huge car parks, rather than insisting they build new ones?

18. Town Centres

Yes- The Parish Council agrees with the proposed policy approach

Response:-

Frampton Cotterell Parish Council supports the proposals to protect, enhance and upgrade the primary shopping area and town centre, and to increase the capacity of Yate Railway Station and facilities around it. Big improvements for active travel on Station Road are needed to encourage Frampton Cotterell commuters to cycle and train into Bristol, or cycles to the shops in Yate centre. Higher density in town centres should be considered to minimise the threat to development on the green belt. The Parish Council would like to see more flexibility and imagination on what a town centre needs to be in the next decades – to enable centres to adapt to both a changing environment and changing use (much of which we cannot accurately predict out to 2040). Less rigid zoning, and maybe periodic reviews to ensure policy remains fit for purpose going forward.

19. Affordable Homes

Yes- The Parish Council agrees with the proposed policy approach

Response:-

Frampton Cotterell Parish Council supports the proposed 35% requirement for social housing in new development. There is a particular shortage locally of one and two bedroom housing suitable for first time buyers and elderly people seeking to downsize.

20. Accommodation for Gypsies & Travellers

- **Yes- The Parish Council agrees with the proposed policy approach**

Response:-

Frampton Cotterell Parish Council support this but only on the basis that the Gypsy and Traveller community have been properly consulted and the measures proposed fairly reflect that consultation.

21. Accommodation for Travelling Showpeople

Yes- The Parish Council agrees with the proposed policy approach

Response:-

Frampton Cotterell Parish Council support this but only on the basis that the Showpeople community have been properly consulted and the measures proposed fairly reflect that consultation

22. Mineral working & restoration

Yes- The Parish Council agrees with the proposed policy approach

Response:-

Frampton Cotterell Parish Council support this, although recycled aggregates are mentioned in passing, the Council would like to see a greater emphasis on this, as it's much lower carbon (as well as less environmentally damaging in the short term). However there are no yield targets specified.

23. Energy Management in New Development

Yes- The Parish Council agrees with the proposed policy approach

Response:-

Frampton Cotterell Parish Council's view is that BREAM is a reasonable standard to incorporate in all developments (as is Passivhaus, though other standards are likely to emerge, and should be encouraged where they are high-enough). Allowing offsetting at all is not ideal, but the approach setting the cost fairly high, and putting some in SGC's hands can help ensure use of non-junk offsets, which is preferable to allowing developers to buy cheap, useless or fraudulent offsets.

The Parish Council would like to see stronger presumption against biomass, which is looking less and less sustainable at scale (e.g. Drax) and is more polluting (in terms of particulates) than most other options. Burning stuff for heat should be unnecessary in efficient new builds and shouldn't be encouraged at all. Hydrogen wording is stronger and better, given its lack of practicality for grid-level deployment (certainly in terms of housing).

This should also include emissions from vehicles operated by residents (or commercial users) of developments, as well as just operational emissions from the buildings.

24. Embodied Carbon

Yes- The Parish Council agrees with the proposed policy approach

Response:-

Frampton Cotterell Parish Council:

- believe this is comprehensive, but why are the proposals only 'expected' and not 'required' to show how a development will minimise its embodied carbon? Other sections require developers to act, so why not the overarching policy? Embodied carbon is part of developers' (or builders' etc) upstream Scope 3 carbon emissions; these should be heading rapidly towards zero in any case, if companies have any intention to be net zero operations. This should be expected as normal for all businesses already.
- urge South Gloucestershire to encourage prioritising renovation and retrofit of low embodied carbon construction techniques too (i.e. wood-frame / straw-

bale / rammed earth etc, especially for self-build plots).

25. Renewable & Low Energy Systems

Yes- The Parish Council agrees with the proposed policy approach

Response:-

Frampton Cotterell Parish Council :

- support this however it is questionable whether biomass should be included; the sustainability of biomass at scale is highly suspect (e.g. Drax power station). And burning biomass has higher non-carbon emissions (primarily particulates) which are much higher than burning fossil fuels. It Should be treated as similar to hydrogen; no major place for it foreseen... If the fabric of the building is approached properly, there should be no need for any biomass in domestic settings.
- Any use of historic mining remains for energy generation should be required to contribute to their preservation and accessibility to the public and avoid their damage or loss.

26. Community Energy

Yes- The Parish Council agrees with the proposed policy approach

Response:-

Frampton Cotterell Parish Council are really pleased to see this as a policy; there are big potential cost of living benefits for residents, and further potential to recycle profits within the community instead of sending too much of residents' money away to corporate shareholders. The Parish Council would like to see SGC offering financial support to community energy initiatives to kick-start schemes, in addition to the policy support, given the cost of living co-benefits.

27. Internal Space & Accessibility Standards

Yes- The Parish Council agrees with the proposed policy approach

Response:-

The Parish Council support this.

28. Strategic & Major Sites Delivery Policy

Yes- The Parish Council agrees with the proposed policy approach

Response:-

Frampton Cotterell Parish Council thinks this looks sensible, although the infrastructure section seems a little vague – any new developments should be linked to both public transport and active travel networks at an early stage to avoid early car-dependency.

29. Stewardship Policy

Yes- The Parish Council agrees with the proposed policy approach

Response:-
Frampton Cotterell Parish Council support this.

30. Upload an attachment

None uploaded