



EMERSONS GREEN

TOWN COUNCIL

13th of February 2024

Local plan responses.

2. Council Priorities and Local Plan Objectives

The plan claims its objectives address the pressing challenges of the climate and nature emergencies and cost of living crisis while considering future generations in the decision-making. Considerable work appears to have gone into the various chapters yet careful reading of the whole document has revealed discrepancies in data between chapters e.g. inconsistent codes and levels of proposed housing for the same site across chapters. This suggests chapters were produced in isolation. Rather than taking the opportunity to take the best from each lens, what has been produced is a series of lackluster and short-term priorities and objectives within a narrow and ill-considered emerging preferred strategy at a time when the 2022 Quality of Life Report shows 36% feel South Gloucestershire has become a worse place to live (p6).

This plan is unimaginative and inward-looking and offers the least demanding options which do not contribute to and enhance the natural and local environment in line with NPPF 180 and are likely to contribute to rather than mitigate climate breakdown and biodiversity loss. There appears no consideration of growing concerns by CPRE that the take-up of greenfield land has increased substantially despite having more functionality for climate adaptation or nature conservation if left undeveloped (para 146) or as raised by Natural England & Wildlife and Countryside Link that pressure from new housing developments is causing irrepressible damage to nature and the climate and is not compatible with targets to halt the decline of species in the Environment Act (para 152) (House of Lords land use in England committee in paper 105 2022)

Already it appears South Gloucestershire has forgotten that it stated that *“it values the county’s diverse landscape, beautiful countryside and areas of outstanding natural beauty”* and that *“we want to keep it that way, recognising the importance of maintaining what residents’ value most, particularly the area’s heritage and access to nature-rich green spaces”* (climate emergency strategy p11). Indeed, the emerging plan completely ignores the Core strategy CS.21 which states *“the designated Green Belt in this area will remain. This area is not considered to be suitable for development because of major constraints, specifically the importance of the open countryside, hillside, and ridgelines that establish the setting and help define the extent of the urban area, the current limited employment opportunities, the lack of potential for integrating new development and the extreme difficulty of delivering essential transport improvements”*.

Instead of acknowledging the need for the whole of South Gloucestershire to play its part in tackling the difficult decisions needed to build a prosperous county, many of the arguments especially around infrastructure and capacity have been weaponised to develop a plan that

presents an apologist view of defending “not in my back yard” for some towns whilst allowing the destruction of large swathes of green belt with the resultant loss of agricultural land, damage to vital strategic green corridors and loss of habitat and bio-diversity. The resultant emerging preferred strategy is not proportional, is extremely destructive, and does not present the best options for a prosperous future.

A review of green belt boundaries is not essential and should only be considered as a last resort based on demonstrable and fully justified evidence of exceptional circumstances (NPPF 145) according to WECA’s strategic green belt assessment, require consideration of the ‘nature and extent of harm’ and ‘the extent to which the consequent impacts on the purposes of the green belt may be ameliorated or reduced to the lowest reasonably practicable extent’” (WECA 2022:7). The lack of convincing evidence that the emerging preferred strategy truly represents the best and only options for the county suggests exceptional circumstances are not fully evidenced.

The specific purpose of the Green Belt at risk of development in the east fringe is to prevent urban sprawl and keep land open (6a.9). It should be noted that the Green Belt benefits not only South Gloucestershire residents but with a lack of green belt in Bristol (600ha) and being so easily accessible, South Gloucestershire’s 23,040ha of green belt plays a vital role in the wellbeing of Bristol residents. Yet the proposed developments around and adjacent to Shortwood and land north of Lyde Green – otherwise known as Henfield does exactly the opposite and opens the floodgates to Bristol expansion.

There is little evidence to suggest the plan gives any consideration to future generations. The NPPF 124b recognises that undeveloped land, such as the undisturbed or undeveloped Green Belt around the east fringe, has a vital role in addressing climate change by providing critical carbon storage, helping to alleviate urban heat island effects and can absorb heavy rain and mitigate against flood risk. Yet this is ignored despite being part of the stated aims of the green infrastructure strategy. Likewise, no value is placed on losing agricultural land, essential in future efforts to improve food security and self-sufficiency and reducing food miles despite being listed as important in both the green infrastructure strategy and a pledge in the climate emergency strategy.

Chapter 10 suggests the value of South Gloucestershire’s unique and varied landscapes is understood as a number of strategically important green corridors and visually important hillsides and strategic viewpoints have been identified as needing protection. Again, this is simply ignored in the emerging preferred strategy around the east fringe despite this being key to the climate emergency strategy which pledges to protect and improve local habitat through sensitive land management to benefit nature and improving, increasing, and linking woodland, grassland and wetland networks.

As the town council will endeavour to demonstrate through its responses, it does not believe there is enough evidence to support the proposed release of green belt on the scale being promoted in the emerging preferred strategy. Evidence from the various strategic lenses suggests that if a whole county approach was adopted, the loss of green belt could be far better managed and proportionate.

House for Lords Land Use in England Committee (2022) *Making the most out of England’s land Report of Session 2022-23 HL Paper 105* Online available from https://publications.parliament.uk/pa/ld5803/ldselect/ldland/105/10506.htm#_idTextAnchor071 {Accessed 5/2/24

South Gloucestershire Council (2022) Quality of Life Report 2022 Online Available from <https://beta.southglos.gov.uk/static/5807ad4cfd7201dfd104b4353a36988e/Quality-of-Life-Report-2022-Final.pdf> {Accessed 24/01/24}

South Gloucestershire Council (2020) *Climate emergency strategy* Online available from <https://beta.southglos.gov.uk/static/2f6a99c0e8736dfa043ddfaccdd8614aa/Climate-Emergency-Strategy.pdf> {Accessed 23/1/24}

WECA (2022) *Strategic green belt assessment* Online available from <https://beta.southglos.gov.uk/static/0ec6941e88e8b7bb38080f744a770aee/WECA-Strategic-Green-Belt-Assessment.pdf> {Accessed 28/01/24}

Objective 1 – New homes for all communities

1a. By focussing on the narrow selection of locations, the emerging preferred strategy does not provide everyone with access to decent, safe and sustainable homes, including affordable and specialised homes and tenures in the communities where they live. Growth is needed in all settlements to maintain their viability and sustainability or over time, outlying villages risk becoming dormitory suburbs with no facilities.

1b. The emerging preferred strategy does not provide the range of differently sized sites for new homes in sustainable locations across the whole of South Gloucestershire. As identified in Phase 2 organic growth in settlements across the county is essential for the long-term sustainability of all our villages and rural communities. It also does not consider the 2662 vacant properties in South Gloucestershire at October 2023 of which 723 are long term.

1c It is claimed that the plan will provide effective use of land by optimising density in sustainable and appropriate locations presumably in accord with NPPF 74. This is a sensitive eastern fringe green belt where the long-term proposal is for 6150 homes including sites at the M4 and others adjacent to the A4174 ring road finishing at the A420 at Bridgegate. Yet the CPRE in their State of the Green Belt report suggests green belt developments are land-hungry and are not providing the affordable homes needed to meet the housing crisis (2023:5). Small existing communities will be obliterated, and the new developments will require extensive investment in infrastructure, facilities, and services if these communities are to be sustainable.

CPRE (2023) State of the Green Belt 2023 A vision for the 21st century Online available from <https://www.cpre.org.uk/wp-content/uploads/2023/08/State-of-the-Green-Belt-2023-online.pdf> {Accessed 19/01/24}

Department for Levelling Up, Housing and Communities (2012) *Live tables - Table 615 Vacant dwellings by local authority district: England, from 2004* Online available from <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants> {Accessed 01/02/24}

Objective 2 – Travel and transport

2a. The focus on A4174 does nothing to help the surrounding rural communities with sustainable public transport.

2b. As an example, while 60 homes at Pucklechurch can be viewed as a proportionate to its facilities (NPPF 83), building in excess of 5000 homes in or adjacent to the Emersons Green, Lyde Green, and Pucklechurch areas is obliteration.

A further example is L2-EG2. This site is unsuitable due to concerns over the intense pressure it would put on the narrow thoroughfare of Cossham Street and the centre of Mangotsfield.

2c. As detailed in our responses to question 10. *Transport Corridors and Hubs*, the emerging preferred strategy is ignoring the reality that existing infrastructure is already at or near capacity and will require new investment if developments are to be sustainable (SGC Monitoring Report 2023). Data and access profiles (DAPs) show low numbers of residents live and work in the same place even in areas with multiple employment options - Patchway has 11628 jobs/whilst 12% work in the area, Cribbs 6466/10%, Bradley Stoke 8177/12% & Stoke Gifford 20006/15%.

Air pollution including NO₂, and particulates PM_{2.5} & PM₁₀ is an ongoing problem across the county. Although levels meet UK standards, they exceed World Health Organisation (WHO) target levels and continue to pose a threat to health as detailed in the Clean Air strategy. In terms of the percentage of adult deaths attributable to PM_{2.5}, the 2017 data shows that “in South Gloucestershire the percentage of deaths attributable to PM_{2.5} was 5.1% (over 1 in 20 deaths). This is the same as the national average and the urban area of Bristol (5.1%), but worse than the South West average (4.4%), Bath and North East Somerset (4.7%) and North Somerset (4.3%)” (2020:17).

As shown in the Clean Air Strategy, South Gloucestershire residents have high levels of access to cars (87% and 42% with 2+) and the 2021 census confirms their use to commute over public transport and active travel (3% use public transport, 2% cycle and 5.7% walk). With proposals for over 5000 homes, traffic congestion and its corresponding negative impacts will only increase on the eastern fringe. Yet valid options and discussions from the three strategic lenses which could lessen the burden by providing proportionate development across the county and focus on access to sustainable transport such as rail are not even considered. As a result, villages in and around and including Yate which have access to a rail station have minimal or no development while the disproportionate pressure on the already overloaded A4174 will further exacerbate the existing challenges of getting to Parkway station.

The emerging preferred strategy presents what appears to be a series of lazy options rather than commitments to develop an aspirational plan for a vibrant and forward-thinking district that values and protects both its economic well-being and its natural resources and environments.

It is questionable if the impact of transport issues has been sufficiently addressed to be in accord with NPPF 108.

South Gloucestershire Council (2023) Authority’s Monitoring Report (AMR) 2023 Online available from <https://beta.southglos.gov.uk/static/79aa7d8a35b170e0fb6d76c252cdf4f3/Authority-Monitoring-Report-2023.pdf> {Accessed 25/01/24}

South Gloucestershire (2020) Clean Air strategy 2020-2024. Online available from https://beta.southglos.gov.uk/static/c6c6f2ec3cbeb827903031a75f57f61d/SGC-Clean-Air-Strategy-2020-2024_FINAL_accessible.pdf {Accessed 22/01/24}

Objective 3 – Climate, nature and heritage

All laudable objectives but:

Climate – the mass of development in the Shortwood area will remove the vital role played by the green belt in addressing climate change by providing critical carbon storage, helping to alleviate urban heat island effects, and ability to adsorb heavy rain and mitigate against flood risk.

Nature - At the forefront of this local plan should be measures to address climate change. The nine Green Infrastructure interlinking corridors are invaluable assets that cannot be replaced. Indeed DEFRA and The Environment Agency both stress the multi-functional benefits and importance of green corridors which contribute to a competitive economy by mitigating climate change, managing flood risk, health benefits and improved water quality while enhancing the natural environment (para 160) (House of Lords 2022). Not only are they interdependent upon each other, they are essential in “delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity” as defined in the NPPF. Fracture the infrastructure in one area through inappropriate or ill-considered development and there are likely to be devastating consequences in another. Already the 2022 Quality of Life Report shows South Gloucestershire has only achieved 1% of its target to double tree cover from approx. 10% to 20% by 2030 and woodland and hedgerow species such as dormice and hedgehogs continue to be in decline. Species rich grassland and wildflowers are in decline as are the insects that rely on them, and the majority of wetland habitats have been lost while no rivers have an Environment Agency score of ‘good’ for ecological quality (p20). Yet further degradation is planned.

Chapter 10. Planning for strategic green infrastructure states that connected and co-ordinated development of homes, jobs, and infrastructure must also include the enhancement to green infrastructure. Yet the preferred option proposals for in and adjacent to Shortwood are obliterating large areas of the strategically important green corridor D where topography forms a mosaic of environments that contribute to strategic networks for both woodlands and calcareous and neutral grasslands. Both support a variety of flora and species-rich grassland and provide habitats for protected and amber and red listed species (Landscape Character Assessment Area 6 p83).

Heritage - One of several visually important hillsides (also Pucklechurch Ridge, and adjacent Oldland Ridge), Shortwood Hill is directly impacted by the proposed developments and will be surrounded by high density housing despite 3c talking of protecting and enhancing the character, distinctiveness, quality, and intrinsic features of the natural and historic environment.

Objective 4 – Design and place-making

Creating a positive sense of place is essential for well-being. Pucklechurch like many parishes sits within the Green Belt which plays an important role in the mental, social, and physical wellbeing of our populations (CPRE’s State of the Green Belt 2023). There appears no recognition of this fact within the plan and with limited green belt around Bristol, South Gloucestershire’s easily accessible green belt is equally of huge benefit to Bristol residents.

One of the drivers for expanding the A4174 around the Shortwood area appears to be its proximity to existing services at Emersons Green and Lyde Green. Yet the council's commissioned design and character study for those areas note "the ring road is a barrier, splitting the two halves of the neighbourhood" and "the layout is car dominated" (p30) and Emersons Green is not identified as having good bus provision (p68), increasing pressure on the congestion in our area.

Placemaking includes infrastructure and facilities including sufficient choice of school places to meet the needs of existing and new communities (NPPF 99). South Gloucestershire's Schools Forum current position on school places paper (2023:4) notes the impact of major new housing developments need consideration "*against a backdrop of insufficient basic need funding, limited developer contributions and rising construction costs*" and that "*the provision of new schools arising in the local authority may be hard to justify*". It argues "*that expansion of existing schools should be considered in the first instance*" yet there is no such evidence to suggest that the impact on existing provision of over 5000 homes in the eastern fringe has been modelled. Added to this, current projections are based on the existing numbers in primary schools.

There appears scant regard for what it means to be a community. Where is the emphasis on ensuring communities are supported by well-resourced recreational, sporting and leisure opportunities in any of these emerging proposals? The strategy will greatly increase the number of residents who all have the basic right to adequate health services, dentists and hospitals. People die yet there are no provisions for crematoria/burial sites to support such an increase in population. Overall, the feel is of plans being driven by investor profit and what the powerful large developers want rather than what is in the best interests of your electorate, the people who call South Gloucestershire home.

CPRE (2023) State of the Green Belt 2023 A vision for the 21st century Online available from <https://www.cpre.org.uk/wp-content/uploads/2023/08/State-of-the-Green-Belt-2023-online.pdf> {Accessed 19/01/24}

South Gloucestershire Council (2023) Schools Forum Current position on school places Online available from <https://beta.southglos.gov.uk/static/4ce0ec14b3400a7c4d4d12455e4adbb1/Schools-Forum-Item-9-Place-Planning.pdf> {Accessed 29/01/24}

South Gloucestershire Council (2022) Density & Character Study Online available from <https://beta.southglos.gov.uk/static/6e5b132322aa4199ae0a3147ecdcdc59/Density-and-Character-Study-January-2022.pdf> {Accessed 31/01/24}

South Gloucestershire Council (2022) Quality of Life Report 2022 Online Available from <https://beta.southglos.gov.uk/static/5807ad4cfd7201dfd104b4353a36988e/Quality-of-Life-Report-2022-Final.pdf> {Accessed 24/01/24}

Objective 5 – Jobs and businesses

Phase 3 draft planning policies 2023 Economy and Jobs already identifies that East Fringe provides the highest residential concentration for South Gloucestershire, with key strategic employment assets such as the Bristol and Bath Science Park and the National Composite

Centre, both within the Emersons Green Enterprise Area¹ deemed a significant employment location. In proposing a better balance between local jobs and residents, evidence already suggests the enterprise area attracts employees from throughout South Gloucestershire and beyond and with emerging jobs anticipated in fin-tech and digital/technology research these will only be available to those with the specialist skills and may well increase commuting.

As noted under objective 2, the evidence from data and access profiles (DAPs) shows low numbers of residents live and work in the same place even in areas with multiple employment options - Patchway has 11628 jobs/12% work in the area, Cribbs 6466/10%, Bradley Stoke 8177/12% & Stoke Gifford 20006/15%. Where is the evidence/research to support the claims that increased employment opportunities will result and reduce the need to commute as multiple factors outside the control of this strategy influences where people live.

The plan further states its aim is to influence long distance commuting yet according to the 2021 census, only 3% of the South Gloucestershire population actually commute over 30km see below, most are shorter local journeys, indeed the council's Clean Air strategy shows 2 in five commuting journeys are less than 2km (p11).

Commuting distances	South Gloucestershire
Less than 10km	36%
10km – 30km	12%
Over 30km	3%

ONS (2023) *Census 2021 Pucklechurch profile* Online available from <https://www.ons.gov.uk/visualisations/customprofiles/build/> {Accessed 25/07/23}

Objective 6 – Deliverability and viability

No comments

3a. Planning for Economy and Jobs

No comments

3b. Planning for Economy and Jobs

No comments

3c. Planning for Economy and Jobs

No comments

4. Planning for Town Centres

No comments

5a. Planning for Infrastructure

No comments

5b. Planning for Infrastructure

No comments

¹ <https://beta.southglos.gov.uk/publications/local-plan-phase-3-towards-a-preferred-strategy/phase-3-planning-policies/#economy-and-jobs> and SG-12a Science Park/12b Emerald/Harlequin Parks /12c Vertex Park

6a. Urban Areas and Market Towns

Yate

Yate is the major town in the county and has an enviable range of established services and facilities including retail, commercial, healthcare, leisure and employment, good public transport including bus station/terminus and railway station and active travel options. Yet there are no significant developments on brownfield sites being proposed for Yate in the emerging strategy. It is disingenuous to suggest that Yate has somehow been overwhelmed by the new north Yate neighbourhood of around 3,000 homes and associated infrastructure and services when it was a planned development as part of the agreed core strategy contributing to Yate's self-sufficiency (p21). Yate now has an agreed masterplan² yet its "vision, ambition and principles" that will shape Yate's future during the lifetime of this local plan (Masterplan final report p63) are conspicuously absent bar mention of the minimal addition of 362 houses. Instead despite this prospect of potential extensive public/private investment, it is being argued that further housing will cause significant negative impacts on the local highway network and A432 corridor, will affect community cohesion and impact the role and function of Yate as a key service centre.

It is interesting that there is no reference to the fact that the Yate DAP shows far higher levels of residents working in the area at 27% – that more sustainable approach to live/work that the plan wants. It is very hard to reconcile the inconsistent and often contradictory arguments used in the different lenses to justify the inclusion or exclusion of sites. Instead of focusing on opportunities, the weight of negative rhetoric appears to have been employed to steer the emerging preferred strategy towards disproportionately allocating development to green field sites that surround the urban edge even though these are in fact less resourced areas where the level in growth will increase traffic and pressure on the road networks and will pressurise existing services and facilities, including GP and education facilities.

South Gloucestershire council knows that future development "will put further pressure on existing infrastructure, much of which is at or nearing capacity". It has also been acknowledged that "additional demand will need infrastructure improvements or additional provision and new investment if existing and new neighbourhoods are to be sustainable" (2023 Monitoring Report p12). Despite this, there is an overwhelming feeling that there has been little creative thinking to develop a strategy where housing growth is spread across the whole county in a proportionate manner according to the size, resource and need so it optimises opportunities and reduces any burdens on a few communities.

Thornbury

Thornbury has 15 houses proposed on a brown field site despite having had some £4.6m investment in its high street to boost the local economy and investment in educational and health and the core strategy stating such investment would be supported by appropriate housing growth to strengthen and develop the locality (p21). Furthermore, there is no mention of the forthcoming investment around Thornbury in active travel plan improvements for the A38, Alveston Hill and Bradley Stoke Way and improved A38 bus corridor all of which offer more sustainable travel options.

It is interesting that there is no reference to the fact that the Thornbury DAP's show far higher levels of residents working in the area at 26% – that more sustainable approach to live/work that the plan wants. It is very hard to reconcile the inconsistent and often contradictory arguments used in the different lenses to justify the inclusion or exclusion of sites. Instead of focusing on opportunities, the weight of negative rhetoric appears to have been employed to steer the emerging preferred strategy towards disproportionately allocating development to

² <https://beta.southglos.gov.uk/yate-town-improvement-masterplan/>

green field sites that surround the urban edge even though these are in fact less resourced areas where the level in growth will increase traffic and pressure on the road networks and will pressurise existing services and facilities, including GP and education facilities.

South Gloucestershire council knows that future development “will put further pressure existing infrastructure, much of which is at or nearing capacity”. It has also been acknowledged that “additional demand will need infrastructure improvements or additional provision and new investment if existing and new neighbourhoods are to be sustainable” (2023 Monitoring Report p12). Despite this, there is an overwhelming feeling that there has been little creative thinking to develop a strategy where housing growth is spread across the whole county in a proportionate manner according to the size, resource and need so it optimises opportunities and reduces any burdens on a few communities.

6b. Urban Areas and Market Towns

All brownfield sites should be used.

7. Towards a Preferred Strategy

The emerging preferred strategy claims to be a local plan for South Gloucestershire yet its deeply flawed focus on extending urban fringe development onto highly sensitive green belt and its plans to breach the A4174 and M4 at its eastern fringe means it feels like a local plan for the extension of greater Bristol. If green belt status is removed on the questionable evidence presented that exceptional circumstances have been met, it will set a precedence and once the floodgates are opened there will be no defence to prevent future developments expanding further into the green belt in the future.

Green belt

Core strategy CS.21 states “the designated Green Belt in this area will remain. This area is not considered to be suitable for development because of major constraints, specifically the importance of the open countryside, hillside and ridgelines that establish the setting and help define the extent of the urban area, the current limited employment opportunities, the lack of potential for integrating new development and the extreme difficulty of delivering essential transport improvements”. Based on these assessments in the council’s own policies, the mass developments along the A4174 fringe are not going to meet the NPPF sustainable development criteria as there are major constraints to meet the economic, social and environmental dimensions noted in 6.15 (p47) yet these sites form a substantive part of the preferred emerging strategy.

The east fringe is identified as a diverse urban area which sits between Bristol City and open countryside with prominent hillsides, footpaths, commons and woodlands which are highly valued by communities and help visually define the extent of the urban area. These proposals appear contrary to the Core Strategy vision for the eastern fringe which states “*In the period to 2027 and beyond, the distinctive identity and heritage of the linked communities in the East Fringe of Bristol will be preserved and enhanced. The landscape setting of the area and of surrounding villages will be preserved and opportunities will be taken to make the urban area greener*”. It ignores CS29 that states development plans /proposals will take account of the vision and will “*protect the open green hillsides to the east which encompass the Pucklechurch Ridge, Shortwood Hill and Oldland Ridge, as well as Hanham Hills to the south, which provide important backdrop views from the urban area making a significant contribution to the character and quality of the East Fringe of Bristol.*”

The West of England Combined Authority’s strategic green belt assessments, assess all the land identified as east fringe development sites as highly sensitive green belt (2022). With the strong M4 boundary, BV13 is deemed to make significant contributions to checking the

unrestricted sprawl of large built-up areas, preventing neighbouring towns from merging into one another, assisting in safeguarding the countryside from encroachment and urban regeneration, by encouraging the recycling of derelict and other urban land. With strong visual separation from the urban area, BV3, 5, 9 & 14 make significant contributions to checking the unrestricted sprawl of large built-up areas, assisting in safeguarding the countryside from encroachment and assisting in urban regeneration, by encouraging the recycling of derelict and other urban land. They also make a moderate contribution to preserving the setting and special character of historic towns. A breach of the consistent boundary formed by the A4174 and Dramway track would create a significant expansion of Bristol. There appear little regards to policies CS2, CS9, CS16 and CS34 and does not address CS 13 which states “these existing green assets, both in urban area and the surrounding countryside, need strategic visions and significant enhancement to realise their potential.

At the forefront of this local plan should be measures to address climate change. The nine Green Infrastructure interlinking corridors are invaluable assets which cannot be replaced. Not only are they interdependent upon each other, they are essential in “delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity” as defined in the NPPF. Fracture the infrastructure in one area through inappropriate or ill-considered development and there are likely to be devastating consequences in another.

Much of the Green Belt around the east fringe is undisturbed and undeveloped and has a vital role in addressing climate change by providing critical carbon storage, helping to alleviate urban heat island effects and is able to adsorb heavy rain and mitigate against flood risk (NPPF 124b). There is no evidence this has been considered.

The CPRE’s State of the Green Belt 2023 report clearly identifies the very important part the green belt plays in the mental, social and physical wellbeing of our populations. It should be noted that the benefits of a green belt in South Gloucestershire are not only essential to local residents. With a lack of green belt in Bristol (600ha) and being so easily accessible, South Gloucestershire’s 23,040ha of green belt plays a vital role in the wellbeing of Bristol residents. There is no evidence this has been considered.

Homes and jobs

The strategy claims it locates homes and jobs in locations that will reduce long commutes and high reliance on cars, encourage active travel and link to public transport and prevent building commuter towns that rely on long distance travel to access jobs, services and facilities (5.14 & 5.15). Yet the data and access profiles (DAPs) already show that low numbers of residents actually live and work in the same place even in areas with multiple employment options - Patchway has 11628 jobs/12% work in the area, Cribbs 6466/10%, Bradley Stoke 8177/12% & Stoke Gifford 20006/15%. There is no evidence to suggest this will change for developing areas even if there are employment options. Indeed, it appears this thinking is based on the principles of the job-housing balance, a concept which posits that workers choose to live close to their work (Giuliano 1991). However recent research suggests not only is the concept difficult to implement but public interventions are unlikely to succeed. Decisions on where to live and work are personal and complex, and it is misleading to suggest that traffic congestion and air pollution can be tackled by simply co-locating housing and jobs in the proposed large-scale developments.

The reality is that the deepening affordability crisis and limited housing supplies, growing demand and house price inflation, is likely to push workers and jobs further apart and this will

further increase commuting (Benner & Karner 2016; The California Planning Roundtable 2008; Zhou et al 2022). Research further indicates that it is not the co-location of employment and housing that matters, it is the fit between the types of employment and the availability and affordability of housing that locally employed workers can afford that has the greatest impact in reducing commuting (Blumenberg & King 2021). The proposed large-scale developments along the eastern fringe are in prime locations adjacent to unspoilt countryside, will encourage executive style homes to attract affluent Bristol residents and will not provide the affordable homes needed to meet the housing crisis (CPRE)

One of the major flaws in the emerging strategy is the selective use of arguments around the transport infrastructure/road networks to prevent development in one area but promote it in another. For example, '*Lens 3 transport corridor*' states that although the A432 offers public transport and active travel options, the majority of those who travel will opt to use their cars. This is an argument that can be applied to almost all the major routes across South Gloucestershire. If it is deemed valid to use this argument to prevent further development around Coalpit Heath/Frampton Cotterell, it is equally valid in the eastern fringe around Emersons Green and Lyde Green.

The core strategy notes the rapid rate of development in the East Fringes of Bristol has not been matched by supporting services and facilities (3.16) while Air Quality Management Areas (AQMA) have been declared within the North and East Fringes of Bristol due to nitrogen dioxide levels (3.21). It is known that the need for new neighbourhoods to integrate with existing communities to promote cohesion and a sense of place (3.8) has raised many challenges in Emersons Green and Lyde Green and there appears no strategy to address the need to provide more housing for older people, including Extra Care housing (3.15). There current identified problems affecting the area are ignored such as:

- traffic congestion
- air quality issues
- congestion affects bus reliability
- orbital routes poorly served by buses.
- shortage of both green space and sports pitches
- traditional centres³ impacted by large retail parks and new town centres⁴

Air pollution including NO₂, and particulates PM_{2.5} & PM₁₀ is an ongoing problem across the county and must be taken into consideration. Although levels meet UK standards, they exceed World Health Organisation (WHO) target levels and continue to pose a threat to health as detailed in the Clean Air strategy. In terms of the percentage of adult deaths attributable to PM_{2.5}, the 2017 data shows "in South Gloucestershire the percentage of deaths attributable to PM_{2.5} was 5.1% (over 1 in 20 deaths). This is the same as the national average and the urban area of Bristol (5.1%), but worse than the South West average (4.4%), Bath and North East Somerset (4.7%) and North Somerset (4.3%)" (2020:17).

Despite being major towns, there are no significant developments being proposed for Yate, Chipping Sodbury and Thornbury in the emerging strategy. Yet Yate is the major town in the county and has an enviable range of established services and facilities including retail, commercial, healthcare, leisure and employment, good public transport including bus station/terminus and railway station and active travel options. It is disingenuous to suggest that Yate has somehow been overwhelmed by the new north Yate neighbourhood of around

³ Downend, Staple Hill, Kingswood and Hanham

⁴ Longwell Green and Emersons Green

3,000 homes and associated infrastructure and services when it was a planned development as part of the agreed core strategy contributing to Yate's self-sufficiency (p21).

Yate now has an agreed masterplan⁵ yet its "vision, ambition and principles" that will shape Yate's future during the lifetime of this local plan (Masterplan final report p63) are conspicuously absent bar mention of a minimal addition of 200 houses. Instead despite this prospect of potential extensive public/private investment, it is being argued that further housing will cause significant negative impacts on the local highway network and A432 corridor, will affect community cohesion and impact the role and function of Yate as a key service centre. Yet there is no corresponding argument to suggest Lyde Green which is undergoing similar levels of new build and all the associated issues of building a new community will not be able to cope even though it will be impacted by the BV13 development.

Likewise, Thornbury is mainly excluded despite having had some £4.6m investment in its high street to boost the local economy and investment in educational and health and the core strategy stating such investment would be supported by appropriate housing growth to strengthen and develop the locality (p21). Furthermore, there is no mention of the forthcoming investment around Thornbury in active travel plan improvements for the A38, Alveston Hill and Bradley Stoke Way and improved A38 bus corridor all of which offer more sustainable travel options.

It is interesting that there is no reference to the fact that both Yate and Thornbury DAP's show far higher levels of residents working in the area at 27% & 26% respectively – that more sustainable approach to live/work that the plan wants. It is very hard to reconcile the inconsistent and often contradictory arguments used in the different lenses to justify the inclusion or exclusion of sites. Instead of focusing on opportunities, the weight of negative rhetoric appears to have been employed to steer the emerging preferred strategy towards disproportionately allocating development to green field sites that surround the urban edge even though these are in fact less resourced areas where the level in growth will increase traffic and pressure on the road networks and will pressurise existing services and facilities, including GP and education facilities.

South Gloucestershire council knows that future development "will put further pressure existing infrastructure, much of which is at or nearing capacity". It has also been acknowledged that "additional demand will need infrastructure improvements or additional provision and new investment if existing and new neighbourhoods are to be sustainable" (2023 Monitoring Report p12). Despite this, there is an overwhelming feeling that there has been little creative thinking to develop a strategy where housing growth is spread across the whole county in a proportionate manner according to the size, resource and need so it optimises opportunities and reduces any burdens on a few communities.

Roads

It is known that "congestion along the A4174 and on adjacent traffic routes will considerably worsen due to planned local growth in the area" and "journey times will increase significantly between Hicks Gate roundabout and Lyde Green" (Jacobs 2021 *and Statement of Reasons* for the A4174 junction improvements). Overcapacity at the Wick-Wick, Bromley Heath and Hambrook junctions has been identified and congestion will only be further exacerbated by these proposals.

South Gloucestershire already experiences severe traffic congestion at peak times which adversely affects bus journey times and reliability. The Clean Air strategy shows traffic has

⁵ <https://beta.southglos.gov.uk/yate-town-improvement-masterplan/>

increased by 30% (compared to the national average of 21%) since 1991. 87% households have access to a car (national average 73%) with considerable higher than national average numbers having 2 or more cars (42% compared to 29%). The census 2021 has confirmed, residents predominately commute by car.

The A4174 is designed to accommodate longer distance car journeys and is seen as important for 'necessary strategic car trips' to prevent traffic rerouting through local communities (Jacobs *A4174 Junction Improvements Public Consultation Report*). There is already constant pressure on the local rural road networks around Emersons Green, Lyde Green and the surrounding area as these are used to reach the A46, A420 and M4. Whenever there is congestion on or around the A4174, traffic (cars, vans and trucks) especially with the widespread use of Satnavs all transfer to local residential and rural roads in an attempt to bypass the hold ups causing localised grid lock. For example, traffic often routes through the smaller residential roads of Lyde Green when the road system is under pressure, passing next to the primary school and existing small retail centre, interrupting bus flow and decreasing safety. Further, BV14 & PW1 may feed onto the A420 but will also add congestion to local roads including Goose Green, Webbs Heath, Siston Lane and on to Pucklechurch and M4 and A46 and beyond. BV13 will impact B4465 Westerleigh Road and add to congestion around Westerleigh village, Henfield and Coalpit Heath areas to Yate, M5, A46 and beyond. Not only are the roads narrow, as has been experienced recently, many are prone to flooding such as Abson Road by the church, Westerleigh Road by the crematorium, as well as Coxgrove Hill, Siston Lane and Henfield Road.

Further congestion will impact access to the motorway links and north east Bristol fringe and could actually deter the very business opportunities the plan envisages. There may also be a risk that further congestion will compromise the ability to retain existing companies in the area that rely on deliveries and logistics.

Public transport

Within the eastern fringe, many of the identified sites have no or very limited access to reliable public transport. Sites BV9, 13 & 14 would require immediate investment in new public transport as they currently are green fields. BV9 could access a limited 2-hourly service to Kingswood (86 – a subsidised route vulnerable to funding pressures). The nearest public transport to BV14 is a 15-minute walk at Warmley (service 43), BV3, 6 & EG1 could access the hourly service to Emersons Green or Yate (525 – a subsidised route vulnerable to funding pressures) while BV13 would require a walk to Lyde Green Science Park to access public transport. When the Clean Air strategy shows only 3% use public transport, 2% cycle and 5.7% walk for commuting, this raises serious concerns over the claim that these sites would be serviced by public transport. Where is the evidence that it would be viable to extend bus services to these sites when so many bus services have been scrapped as not commercially viable and many others rely on subsidies and are vulnerable to fluctuating funding priorities.

Climate, nature, and heritage

Not enough attention has been given to the fact that the sheer number of sites and proposed density of developments will cause serious damage to these interconnected and fragile green infrastructure network corridors which are essential for nature, wildlife and biodiversity. South Gloucestershire has only achieved 1% of its target to double tree cover from approximately 10% to 20% by 2030. Woodland and hedgerow species such as dormice and hedgehogs continue to be in decline as are species rich grassland and wildflowers and the insects that rely on them. The majority of wetland habitats have been lost while no rivers have an Environment Agency score of 'good' for ecological quality (Quality of Life Report p20)

The proposed eastern fringe developments are on land that sits between three important green infrastructure corridors where the topography provides a range of interconnected natural environments. To the north is the nationally important Cotswold scarp, part of a corridor which includes visually important hillsides with important hill forts and ancient landscapes and uninterrupted views to/from Tog Hill and Freezing Hill across an agricultural landscape of fields with often ancient hedgerows peppered by woodland and rights of way. This links to adjacent corridor H and parts of Pucklechurch Ridge with a number of important hedgerows and wetlands. To the west is corridor D, a mosaic of different environments providing habitats for European protected and amber and red listed species. Associated with visually important hillsides (Pucklechurch Ridge, Shortwood Hill and adjacent Oldland Ridge) it contributes to the strategic woodland network with its copses and fragments of ancient woodlands, is part of the strategic network of calcareous and neutral grassland supporting a variety of flora and species-rich grassland providing springtime nesting and wintertime foraging birds (Landscape Character Assessment Area 6 p83).

Another overlooked fact is that much of the proposed sites are agricultural land, which is going to become increasingly important and essential for future food security and self-sufficiency and to reduce food miles. There appears no evidence that appropriate consideration has been given to the long-term consequences of allowing a disproportionate allocation of housing to rural and green belt areas. This strategy hardly supports the council climate emergency commitments under 'enable' to *"prepare a robust Local Plan with Climate Emergency embedded into the guiding principles, spatial strategy and policies to ensure that new development responds to Climate Emergency and nature recovery"* (p30)

There is little evidence in the emerging preferred strategy that this is the product of a population using its "history of pioneering new ideas" as is claimed in the climate emergency strategy (p12) or that these proposals demonstrate the plans "rise to the challenge of climate change" especially when the 2022 Quality of Life Report already shows that 36% feel South Gloucestershire has become a worse place to live (p6). The burden of accommodating the new development needs to be spread across communities throughout the county to combine organic growth and where further housing is needed, it must be proportionate to the size of the settlement, its infrastructure and services/facilities. Well-resourced and larger towns and areas will have to take more as they are better placed to absorb more developments but development in these locations must also be on a scale that does not overwhelm key services and transport infrastructure. The plan appears to only contain minimal consideration of the implications of our changing high streets and local centres and what opportunities arise from these. Outside the major towns already discussed, what options have been considered for Kingswood, Hanham, Staple Hill, Downend or Patchway to name a few beyond the redevelopment of brownfield sites?

Local intelligence from town and parish councils could have helped improve understanding of the impact of different sites on an area (for example there could be topographical reasons why a partial development of a site might be preferable). Every parish will need to accept some housing. There will be some incursion into the green belt but this should only be in limited locations where it can be sensitively managed, not the wholesale destruction that is being recommended. A defining feature of green belt according to the CRPE is *"its permanence and assurance that it will remain for generations to come to reap the benefits"* (p8) and wherever possible this should be respected.

Sites significant for the local community are important to protect when open space aids the health and climate needs of local residents, for example, site L2-EG2.

This should not be a local plan driven by investor profit and what the powerful large developers want. Rather it should be what is in the best interests of your electorate, the people who call South Gloucestershire home. There will be loss and pain but if it is more reasonably shared and by listening to people, over time there is more likelihood of greater acceptance of extra housing and better community cohesion. Come on South Gloucestershire, you need to do better.

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8. Strategy Lens: No Green Belt Loss

6a.24 argues that locating homes outside the green belt is inherently unsustainable as it will promote and encourage longer car-based commuter travel unless reliable and competitive public transport services are secured and delivered which is challenging due to the long distances covered in reaching centres such as Bristol and the spread of rural villages. Securing access to reliable and competitive public transport services are essential across all the county. As has been experienced recently, commercial operators will and do withdraw un-profitable services regardless of location (urban/rural). Across South Gloucestershire rural communities have no or poor, intermittent services, this is not just an issue for this lens, it is an argument applicable across the whole plan.

Evidence from the data and access profiles do not support the assertions made in 6a.24 around unsustainability.

- i) Thornbury - 42% work at home/within the area and only 15% go to Bristol
- ii) Falfield - 50% work at home/within the area (including Thornbury) while 10% go to Bristol
- iii) Charfield – 24% work at home/within the area while 17% travel to Stroud and 10% to Bristol
- iv) Yate – 47% work at home/within the area (including Chipping Sodbury) while 14% go to Bristol.

Buckover/Thornbury et al are connected to the existing major transport link of the A38. Thornbury will be less than 8 miles from the railway station (Falfield is closer) and is benefiting from the massive investment of £4.6m in its town centre and education and health facilities. There is major investment in a railway station at Charfield which is assessable to its surrounding villages and Yate as the major town is already well served with public transport both bus and rail and with its masterplan will see further improvements over the period of this local plan.

Yet using evidence from this lens, substantial development in Yate and Chipping Sodbury which have key service centres providing services and facilities including shopping, commercial retail and employment to their immediate communities and wider rural communities (6a.31/32/33/40) are discounted. In 6a.33 *Challenges* it is argued that further housing would cause significant negative impacts on the local highway network and A432 corridor and that further development would impact the role and function of Yate as a key service centre.

Yate is a major centre with comprehensive services and is fortunate to have local access to public transport with its bus station/terminus, railway station, which should reduce reliance on the private car and the dedicated cycleway along the A432 corridor. Yet the plan seems to be arguing that despite having these wide range of services, new developments will increase

traffic and will significantly negatively impact the local highways network and A432. Other arguments against further development focus on the network capacity in North Yate which it is argued prevents further development.

In 6a.33 *Challenges* it is argued that large north Yate growth such as L1CSCE14 with 1000 homes plus local centre, primary school and employment, would require suitable highways and public transport solutions. It states that as Ladden Garden Village has been designed with home zone principles - a commendable approach putting people before cars, it cannot be used as a through route so further development would need investment in highways, public transport solutions and active travel connections. Yet Yate's DAP shows 47% of residents work locally/at home suggesting that Yate already has the more sustainable approach to live/work that the plan envisages.

These arguments are not unique to Yate and reflect comments in the Authority's 2023 Monitoring Report which states "future development in South Gloucestershire will put further pressure on existing infrastructure, much of which is at or nearing capacity" and that "additional demand will need infrastructure improvements or additional provision and new investment if existing and new neighbourhoods are to be sustainable" (p12). There will be significant negative impact on the local highways networks wherever there is proposed large scale developments. All will require suitable highways and public transport solutions. It applies even more strongly to the areas adjacent to Emersons Green, Lyde Green, and the A4174 which does not currently have the necessary highways, public transport solutions and active travel connections or facilities to support such large communities.

Air pollution levels including NO₂, and particulates PM_{2.5} & PM₁₀ exceed is an ongoing problem. Although levels meet UK standards, they exceed World Health Organisation (WHO) target levels and continue to pose a threat to health as detailed in the Clean Air strategy. In terms of the percentage of adult deaths attributable to PM_{2.5}, the 2017 data shows "in South Gloucestershire the percentage of deaths attributable to PM_{2.5} was 5.1% (over 1 in 20 deaths). This is the same as the national average and the urban area of Bristol (5.1%), but worse than the South West average (4.4%), Bath and North East Somerset (4.7%) and North Somerset (4.3%)" (2020:17).

The arguments in 6a.27 *Challenges* for Buckover et al equally apply to all the large-scale development sites wherever located. The proposed levels of growth "*would result in higher volumes of traffic on the local and strategic network*", put "*pressure on the capacity and number of school places across this part of the district*" and "*would create communities with limited local access to employment*" so increasing commuting "*across large parts of the district to access jobs and services*" and "*would put pressure on existing services and facilities, including GP and education facilities*". If it is argued that areas with good levels of localised working and access to rail and the main town of Yate and the A432 corridor, with all the access to public transport with a bus terminus, train station and dedicated cycleway cannot cope with increased traffic due to more housing, how is it possible to suggest that the A4174 corridor can cope with further large-scale developments when there are no bus terminus, or local railway stations and feeding into the A4174 is via a number of minor local rural roads.

This lens is focused on the negative and is selectively using increasing car numbers to discount potential sites. The Census 2021 shows that commuting by car is a reality of living in South Gloucestershire and more traffic is going to cause more congestion and more pollution. Having declared a climate emergency, the ambition of the council should be a more balanced approach to sharing development more fairly across the county to minimise

disruption supported by good county-wide public transport and active travel routes to provide viable options to reduce pressure on the road network and contribute to moving towards net zero. In conclusion, this lens presents a series of lazy options rather than commitments to develop an aspirational plan for a vibrant and forward-thinking district that values and protects both its economic well-being and its natural resources and environments.

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<https://beta.southglos.gov.uk/static/79aa7d8a35b170e0fb6d76c252cdf4f3/Authority-Monitoring-Report-2023.pdf> {Accessed 25/01/24}

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<https://beta.southglos.gov.uk/static/0ec6941e88e8b7bb38080f744a770aee/WECA-Strategic-Green-Belt-Assessment.pdf> {Accessed 28/01/24}

9. Strategy Lens: Urban Edge

This and the other two lenses are not mutually exclusive. The parish council believes the basis for this lens is misleading as it is not reflecting development options for all urban edge areas. This lens claims to present options for South Gloucestershire based upon development around its 'urban edge' yet its focus is on the north and east fringes of Bristol and the Severnside. The selected sites on the east fringe identified as urban edge stretch from Pucklechurch through to Webbs Heath – L2-BV1-3, 5-7, 9-12 and 15-17. All are rural green belt sites and are not typical urban fringe. By proposing to breach the A4174 and M4, the eastern fringe proposal is in fact an extension of greater Bristol (6b.5) which contravenes the precise purpose of this area of green belt which is to prevent the urban sprawl and the expansion of greater Bristol.

The NPPF 124b recognises that undeveloped land, especially undisturbed and undeveloped Green Belt such as that around the east fringe, has a vital role in addressing climate change by providing critical carbon storage, helping to alleviate urban heat island effects and is able to adsorb heavy rain and mitigate against flood risk. In the CPRE's State of the Green Belt 2023 it clearly identifies the very important part the green belt plays in the mental, social and physical wellbeing of our populations. Not enough attention has been given to the fact that the land close to Emersons Green and Lyde Green not only forms a key part of the area's green infrastructure network (corridor D) which benefits nature and wildlife but much is agricultural land, essential in the efforts to improve food security and self-sufficiency and reduce food miles be it now or in the future.

L2-BV1-7, 9-10, 12, 15-17 propose over 10,000 homes plus employment sites on green fields sites. The scale of such development will significantly impact already overloaded services such as education and health and add further pressure to the already congested road networks including the A4174 - part of the existing infrastructure which is at or nearing capacity (SGC Monitoring report 2023:12). *6b.21 challenges* clearly identify the need for strategic infrastructure around the A4174 and significant enhancement to public transport networks while the authority notes "additional demand will need infrastructure improvements or additional provision and new investment if existing and new neighbourhoods are to be sustainable (Monitoring report 2023:12).

It is already acknowledged that “congestion along the A4174 and on adjacent traffic routes will considerably worsen due to planned local growth in the area” and “journey times will increase significantly between Hicks Gate roundabout and Lyde Green” (Jacobs 2021 *and Statement of Reasons* for the A4174 junction improvements). Overcapacity at the Wick-Wick, Bromley Heath and Hambrook junctions has been identified and congestion will only be further exacerbated by these proposals. The council’s Clean Air strategy notes that South Gloucestershire already experiences severe traffic congestion at peak times which adversely affects bus journey times and reliability. Traffic has increased by 30% (compared to the national average of 21%) since 1991. 87% households have access to a car (national average 73%) with considerable higher than national average numbers having 2 or more cars (42% compared to 29%).

Air pollution levels including NO₂, and particulates PM_{2.5} & PM₁₀ is an ongoing problem. Although levels meet UK standards, they exceed World Health Organisation (WHO) target levels and continue to pose a threat to health as details in the Clean air strategy. In terms of the percentage of adult deaths attributable to PM_{2.5}, the 2017 data shows “in South Gloucestershire the percentage of deaths attributable to PM_{2.5} was 5.1% (over 1 in 20 deaths). This is the same as the national average and the urban area of Bristol (5.1%), but worse than the South West average (4.4%), Bath and North East Somerset (4.7%) and North Somerset (4.3%)” (2020:17).

The *A4174 Junction Improvements Public Consultation Report* by Jacobs acknowledged that the A4174 is designed to accommodate longer distance car journeys and is seen as important for ‘necessary strategic car trips’ to prevent traffic rerouting through local communities. There is already constant pressure on the local rural road networks around Emersons Green, Lyde Green and the surrounding area as these are used to reach the A46, A420 and M4. Whenever there is congestion on or around the A4174, traffic (cars, vans and trucks) especially with the widespread use of Satnavs all transfer to local rural roads in an attempt to bypass the hold ups causing localised grid lock. In addition, as has been experienced recently, many local roads are prone to flooding including Abson Road by the church, Westerleigh Road by the crematorium, as well as Coxgrove Hill, Siston Lane and Henfield Road. Even the site BV15 north of Lyde Green, which most closely connects to the existing urban area, has poor road connections and is prone to flooding.

Further congestion will impact access to the motorway links and north east Bristol fringe and could actually deter the very business opportunities the plan envisages. There may also be a risk that further congestion will compromise the ability to retain existing companies in the area.

6b.39 suggests that rebalancing jobs in the East Fringe of Bristol will help reduce private car journeys and decarbonise travel. Far from reducing commuting, South Gloucestershire’s baseline information leaflets SG12a-c already suggests that the Emersons Green Enterprise Area provides employment for people from throughout South Gloucestershire and beyond. Any expansion of the science park is likely to require workers with specific specialism which may further increase commuting. It is completely unrealistic to assume that in providing homes and employment, people will want or be able to live near where they work – multiple factors influence such decisions.

Increased journey times cause worsening air quality along the corridor. The clean air strategy suggests that despite Improvements to public transport, only 1 in 10 commutes are by public transport while 2 in five commuting journeys are less than 2km (p11). Cars together

with light and heavy good vehicles, contributes to 44% of all emissions and worsen air pollution which affects lungs, exacerbate asthma and increase cardiovascular and respiratory admissions to hospital (*Draft Clean Air Action Plan* piii). While legal pollution limits may not be breached, the pollution levels recorded can be sufficiently high to be detrimental to health and both NO₂ and PM_{2.5} levels consistently exceed WHO Guideline values (Clean Air Action Plan - 2022-2026 p8)

To function these sites will require significant new infrastructure beyond roads, including schools, healthcare, dentists, sporting, playgrounds, allotments, community and local facilities which are all needed to support and develop communities yet 6b.10 notes that there remains great uncertainty whether such infrastructure is fundable/deliverable. This raises questions over the viability of these proposals as existing services, including hospitals will not be able to cope. Nowhere is there provision for care/nursing homes and crematoria or burial areas.

CPRE (2023) State of the Green Belt 2023 A vision for the 21st century Online available from <https://www.cpre.org.uk/wp-content/uploads/2023/08/State-of-the-Green-Belt-2023-online.pdf> {Accessed 19/01/24}

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10. Strategy Lens: Transport Corridors and Hubs

This is another example of where these lenses should not be mutually exclusive. This transport corridor lens claims it is aimed at placing new developments along already established key public transport routes, transport hubs and rail stations to support the decarbonisation of travel and support climate objectives. Yet it fragments the county and only selects transport corridors north of Winterbourne/Coalpit Heath.

This lens groups larger scale developments around villages in the Winterbourne area, around Yate and Charfield and along the A38 corridor from Almondsbury to Thornbury. It then claims this could overwhelm local services and facilities in the villages, increase commuting due to the lack of employment land and will require investment in strategic infrastructure along key

transport corridors including A4174, A38, B4057 and M5 junctions at 14, 16 & 17. The lens further states the lack of employment land exacerbates the job/homes imbalances.

This is as reported in the Authority's own 2023 Monitoring Report that states "future development in South Gloucestershire will put further pressure on existing infrastructure, much of which is at or nearing capacity" and that "additional demand will need infrastructure improvements or additional provision and new investment if existing and new neighbourhoods are to be sustainable (p12). Yet despite substantial new housing and a new Enterprise area with multiple employment opportunities, the Emersons Green DAP shows only 7% of resident work in the area suggesting that far from reducing commuting, the enterprise area has increased it by attracting employees from across the county and beyond (SGC baseline information leaflets SG12a-c).

It is interesting that in the northern fringe where there are multiple employment options, most residents do not live and work in the same area. DAPs show Patchway has 11628 jobs/12% work in the area, Cribbs 6466/10%, Bradley Stoke 8177/12% & Stoke Gifford 20006/15%. It is completely unrealistic to suggest new developments will encourage people to live near to where they work – multiple factors influence such decisions.

As has been shown in the SGC Clean Air strategy, South Gloucestershire residents have higher than national average access to a car (87%) with 42% having 2 or more. The 2021 census also confirms that residents like to use them where after excluding home workers (35.5%), some 53% of the remaining commuters use vehicles while only 3% use public transport, 2% cycle and 5.7% walk. This is despite massive investment in public transport routes such as the Metro bus. Cars are not just used for commuting but for school runs, to clubs, play and sports facilities, for health, shopping and leisure to name a few. It may be considered these are outside planning but without due consideration beyond just jobs, traffic congestion will only increase across the county causing negative impacts on infrastructure and services.

It is argued that further new housing allocations at Yate and Thornbury would create issues for community cohesion and services and facilities which it is claimed have already made contributions to new housing. Yate is already a major town with established local centres, facilities and public services, employment, railway station, bus terminal and dedicated cycleway along A432. There is a developing masterplan⁶ to shape Yate's future during the lifetime of this local plan which promotes plans to enhance the sense of place and develop sustainable growth to create attractive places to live and work to attract the best talent. Yet the exclusion of and lack of consideration of this plan appears to be being used to justify that Yate, despite all its facilities cannot cope with further development.

Likewise, Thornbury has had some £4.6m investment in its high street to boost the local economy and investment in education and health. It is interesting that neither the current or planned future investments are mentioned in any of the arguments nor that both Yate and Thornbury DAP's show far higher levels of residents working in the area at 27% & 26% respectively which are likely to improve through these investments – just what the plan want. Instead the weight of negative rhetoric appears to be steering the emerging preferred strategy towards proposals accommodating large scale developments in green belt fields in areas with no immediate facilities despite the existing evidence that is suggestive of large-scale urban fringe development increasing pressures.

⁶ <https://beta.southglos.gov.uk/yate-town-improvement-masterplan/>

Decarbonisation and sustainable communities are all essential but where is the ambition in this lens? The overall focus is on the negative promotion of reasons why the better resourced towns do not want further development rather than looking for more positive and potential opportunities, such as those envisaged in the Yate and Thornbury masterplans. Transport links are crucial and like many of the elements in the other lenses should be considered in helping to develop a more sustainable local plan that works for the whole of South Gloucestershire. It needs to be acknowledged that the location of large scales developments is going to place considerable pressure on infrastructure.

Far greater consideration needs to be given to more fairly distributed development across the whole county. This should include organic growth and proportional development in all villages and settlements to protect their long-term sustainability, while accepting that larger and major towns and urban fringe area with more robust existing resources will have a greater capacity to accommodate some more development and therefore should accept further housing. This should help any plans to minimise overall disruption and not destroy the very essence of why people want to live and work in South Gloucestershire.

ARUP Jacobs (2021) Yate Town Improvement Masterplan Final Report Online available from https://beta.southglos.gov.uk/static/93de277bf4913da6fdbbec3693fc4a83/Yate-Town-Improvement-Masterplan-Final-Report_Web.pdf {Accessed 24/01/24}

Office of National Statistics (2023) *Profile South Gloucestershire* Online available from <https://www.ons.gov.uk/visualisations/customprofiles/build/#E06000025> {Accessed 25/01/24}

South Gloucestershire Council (2023) *Authority's Monitoring Report (AMR) 2023* Online available from <https://beta.southglos.gov.uk/static/79aa7d8a35b170e0fb6d76c252cdf4f3/Authority-Monitoring-Report-2023.pdf> {Accessed 25/01/24}

South Gloucestershire (2023) Thornbury High Street Online available from <https://beta.southglos.gov.uk/static/784142d4c2db7645f5ca79bce7697584/Thornbury-High-Street-plans-Feb2023.pdf> {Accessed 25/01/24}

South Gloucestershire (2020) *Clean Air strategy 2020-2024*. Online available from https://beta.southglos.gov.uk/static/c6c6f2ec3cbeb827903031a75f57f61d/SGC-Clean-Air-Strategy-2020-2024_FINAL_accessible.pdf {Accessed 22/01/24}

11. Planning for Gypsies Travellers and Travelling Showpeople

There are far too many unknowns within these proposals to be able to effectively respond. Much of this chapter is taken up with statements of need or future aspirations to meet need, whilst not providing clear and transparent plans. So, despite noting the need for new sites, there are no indications of where these might be located across the county. Equally although it is envisaged there will be intensification on existing authorised sites, there is no indication or details of which sites are to undergo intensification.

12. Planning for Renewable Energy ***Wind safeguarding area 11***

This area is likely to have a significant impact on the identified visually important hillsides and will be highly visible from the strategic views from the protected Cotswold national landscape.

Wind safeguarding area 5

This area is likely to have a significant impact on the identified visually important hillsides and will be highly visible from the strategic views from the protected Cotswold national landscape.

Wind safeguarding area 10

This area is likely to have a significant impact on the identified visually important hillsides and will be highly visible from the strategic views from the protected Cotswold national landscape.

13. Minerals

No comments

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

Q Do you agree with the approach to designating the Strategic Green Infrastructure Network, View Points and Visually Important Hillsides? Yes

The nine Green Infrastructure interlinking corridors are invaluable assets which cannot be replaced. Indeed, DEFRA and The Environment Agency both stress the multi-functional benefits and importance of green corridors and how they contribute to a competitive economy by mitigating climate change, managing flood risk, health benefits and improved water quality while enhancing the natural environment (para 160) (House of Lords 2022).

Not only are these green corridors interdependent upon each other, they are essential in “delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity” as defined in the NPPF. Fracture the infrastructure in one area through inappropriate or ill-considered development and there are likely to be devastating consequences in another. Already the 2022 Quality of Life Report shows South Gloucestershire has only achieved 1% of its target to double tree cover from approx. 10% to 20% by 2030 and woodland and hedgerow species such as dormice and hedgehogs continue to be in decline. Species rich grassland and wildflowers are in decline as are the insects that rely on them, and the majority of wetland habitats have been lost while no rivers have an Environment Agency score of ‘good’ for ecological quality (p20). Protection is essential.

Despite the work undertaken to identify these key corridors, it appears ironic that the emerging strategy itself is threatening them by the scale of housing development it is proposing, especially along the eastern fringe. South Gloucestershire appears to have forgotten that it stated that *“it values the county’s diverse landscape, beautiful countryside and areas of outstanding natural beauty”* (climate emergency strategy p11) or that core strategy CS.21 stated that the area adjacent to the Bristol eastern fringe will not be considered to be suitable for development because of major constraints, specifically the importance of the open countryside, hillside and ridgelines that establish the setting and help define the extent of the urban area.

The east fringe is identified as a diverse urban area which sits between Bristol City and open countryside with prominent hillsides, footpaths, commons and woodlands which are highly valued by communities and help visually define the extent of the urban area. Yet further degradation is planned through large-scale developments that will disrupt and damage the green corridors and appear contrary to the Core Strategy vision for the eastern fringe which states *“In the period to 2027 and beyond, the distinctive identity and heritage of the linked communities in the East Fringe of Bristol will be preserved and enhanced. The landscape setting of the area and of surrounding villages will be preserved and opportunities will be taken to make the urban area greener”*. The proposals ignore CS29 that states development plans /proposals will take account of the vision and will *“protect the open green*

hillsides to the east which encompass the Pucklechurch Ridge, Shortwood Hill and Oldland Ridge, as well as Hanham Hills to the south, which provide important backdrop views from the urban area making a significant contribution to the character and quality of the East Fringe of Bristol.”

The proposed eastern fringe developments are on land that sits between three important green infrastructure corridors where the topography provides a range of interconnected natural environments. To the north is the nationally important Cotswold scarp, part of a corridor which includes visually important hillsides with important hill forts and ancient landscapes and uninterrupted views to/from Tog Hill and Freezing Hill across an agricultural landscape of fields with often ancient hedgerows peppered by woodland and rights of way. This links to adjacent corridor H and parts of Pucklechurch Ridge with a number of important hedgerows and wetlands. To the west is corridor D, a mosaic of different environments providing habitats for European protected and amber and red listed species. Associated with visually important hillsides (Pucklechurch Ridge, Shortwood Hill and adjacent Oldland Ridge) it contributes to the strategic woodland network with its copses and fragments of ancient woodlands, is part of the strategic network of calcareous and neutral grassland supporting a variety of flora and species-rich grassland providing springtime nesting and wintertime foraging for birds (Landscape Character Assessment Area 6 p83).

Yet not enough attention has been given to the fact that the sheer number of sites and proposed density of developments will cause serious damage to these interconnected and fragile green infrastructure network corridors. Furthermore, there appears no consideration of growing concerns by Natural England & Wildlife and Countryside Link that pressure from new housing developments is causing irrepressible damage to nature and the climate and is not compatible with targets to halt the decline of species in the Environment Act (para 152) (House of Lords land use in England committee in paper 105 2022).

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

Same comments as 14a

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

Some comments as 14a

15. New Local Plan Policy Framework – Approach to Adopted Policies

Agree with Policy 2, 3, 4 and 9

No comments on Policy 1, 5, 6, 10, 11, 12, 13 & 14

16. Climate Change Mitigation, Adaptation, and Resilience

Do you agree with our proposed policy approach?

No comments

17. Economy and Jobs

No comments

18. Town Centres

No comments

19. Affordable Homes

Do you agree with our proposed policy approach?

Yes

20. Accommodation for Gypsies and Travellers

Do you agree with our proposed policy approach?

No

Comments: Incomplete details

21. Accommodation for Travelling Showpeople

Do you agree with our proposed policy approach?

No

Comments: Incomplete details

22. Mineral working and restoration

Comments No comments.

23. Energy Management in New Development

Do you agree with our proposed policy approach?

Yes

24. Embodied Carbon

Do you agree with our proposed policy approach?

Yes

25. Renewable and Low Carbon Energy Systems

Do you agree with our proposed policy approach?

Yes

26. Community Energy

No comments

27. Internal Space and Accessibility Standards

Do you agree with our proposed policy approach?

Yes

28. Strategic & Major Sites Delivery Policy

No comments

29. Stewardship Policy

No comments

30. Upload an attachment