



## Examination of the South Gloucestershire Local Plan

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Examination web pages: <https://localplanexamination.commonplace.is/>

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## INSPECTORS' MATTERS, ISSUES AND QUESTIONS

1. We are S Edwards, P Lewis and E Worthington, chartered Town Planners appointed by the Secretary of State to examine the soundness of the South Gloucestershire Local Plan Regulation 19 2025 Consultation Document, which was published for consultation in February 2025 (the Plan), and whether it meets the requirements of the Planning and Compulsory Purchase Act 2004 (the Act) and associated Regulations.
2. The examination of the Plan commenced with our appointment and to date we have undertaken initial reading of the Plan, the evidence base documents and representations, following which we posed a number of initial questions to the Council. Our correspondence and the Council's responses are published on the examination website.
3. In drafting this document, we have had regard to the Council's responses to our initial questions and the various evidence base documents which have been published by the Council since the regulation 19 consultation. We advise you to read the Council's further submissions in preparing responses to our questions.
4. We have now identified the matters and issues and pose the key questions (MIQs) for the examination. These are set out in this document.
5. Please read and be familiar with the accompanying Inspectors Guidance Note (ID/08) which sets out important details of the organisation and conduct of the examination and the hearings, and regarding the preparation of written statements. We shall assume that the Guidance Note has been read by participants at the hearings.
6. In order to assess the legal compliance and soundness of the Plan, we pose many questions in this document. It is our hope that many of the questions set out in this document will be answered in written statements. Consequently, we will not need to consider them further at the hearings as we would have

sufficient information, enabling us to focus on the outstanding matters. It is important to note that written representations and oral representations carry the same weight, and we will have equal regard to views put at a hearing or in writing.

7. Whilst we publish a draft hearings programme (ID/10) alongside these MIQs, the scope and timing of specific hearing sessions will be confirmed via the examination website. Representors should only address those matters, issues and questions relevant to their original representations.
8. Any reply to our questions should be in accordance with the guidelines set out in our Guidance Note and should be sent electronically to the Programme Officer by **5.00 pm on Tuesday 28 April 2026**. It is expected that hearing statements will only be submitted electronically.
9. Only those who have made representations seeking to change the Plan have a right to appear before, and be heard by, the Inspectors. If you have a right to be heard, and you wish to exercise that right, you should contact the Programme Officer by **5.00 pm on Friday 10 April 2026** indicating the appropriate Matter(s) and the session(s) you wish to attend (see the draft Programme). You need to do this regardless of what you may have indicated on the representation form. Please note that if you do not contact the Programme Officer by that date, it will be assumed that you do not wish to appear and be heard, and you will not be listed as a participant.
10. Please note that all references to the National Planning Policy Framework (NPPF) relate to the version of that document published in December 2023.

### **Main Modifications**

11. The Council has suggested a number of main modifications to the Plan. These will be discussed as appropriate in relevant hearing sessions. Where the Council proposes main modifications to the Plan, their response to our MIQs set out in their written statements should refer to them and explain why they consider that they are necessary for legal compliance or soundness (against the tests of soundness set out in the NPPF).

## **Matter 1: Procedural/legal requirements**

### **Issue: Whether all Statutory and Regulatory requirements have been met?**

#### **Duty to Cooperate**

S33A of the Planning and Compulsory Purchase Act 2004 set out a duty to co-operate in relation to planning of sustainable development. The new plan-making system provided by the Levelling-Up and Regeneration Act 2023 does not include the Duty to Cooperate, and once the Regulations are in place (25 March 2026), the duty to cooperate requirement for plans in the current system will be removed.

Therefore, we shall not consider the duty to cooperate as a procedural/legal requirement.

The NPPF includes policy on maintaining effective cooperation and we will assess the soundness of the Plan in this regard in the consideration of the other matters and issues.

#### **Sustainability Appraisal**

- Q.1 Is the Sustainability Appraisal (SA) adequate and have the legal requirements of the 2004 Act and the 2012 Regulations been met?
- Q.2 How did the Council consider reasonable alternatives for different levels of housing growth to be provided by the Plan through the SA process?
- Q.3 Why was it decided that providing levels of growth over or under the objectively assessed need (OAN), including accommodating any unmet housing need of the Bristol City Council area was not considered as reasonable alternatives. Was this assessed in the SA process?
- Q.4 What, if any role did the sustainability appraisal process play in the selection of sites to be allocated by the Plan? How were reasonable alternatives determined and assessed?

#### **Habitats Regulations Assessment**

- Q.5 Has the Habitats Regulations Assessment been undertaken in accordance with the Conservation of Habitats and Species Regulations 2017?

The Habitats Regulations Assessment (HRA) at the Regulation 19 stage identified two areas where there would be potential adverse effects on the integrity of certain Habitats Sites. These were not resolved at the time of its publication. These are in respect of recreational effects upon the Severn Estuary SAC/SPA/Ramsar, and air pollution (vehicle emissions) on the Severn Estuary SAC (and SPA/Ramsar indirectly), Bath & Bradford on Avon Bats SAC, River Wye SAC, Wye Valley Woodlands SAC, and Avon Gorge Woodlands SAC. The revised HRA and statement of common ground with Natural England indicate that these matters can be resolved by main modifications to the Plan. The proposed changes to the Plan will be discussed under the relevant matter later in these hearings.

- Q.6 Have the outstanding HRA issues been resolved? What, if any, are the viability implications of the main modifications proposed to address these matters?

### **Local Development Scheme**

Section 19(1) of the 2004 Act requires development plan documents to be prepared in accordance with the Local Development Scheme, which the Council refers to as the Local Plan Delivery Programme.

- Q.7 Was the Plan prepared in accordance with the Council's Local Plan Delivery Programme (LPDP)?

### **Community Involvement**

- Q.8 Has the Council complied with the requirements of section 19(3) of the 2004 Act with regard to conducting consultation in accordance with the Statement of Community Involvement?

### **Climate Change**

- Q.9 Are the policies of the Plan designed to secure that the development and use of land contribute to the mitigation of, and adaptation to, climate change in accordance with Section 19(1A) of the Act?

### **Equalities**

- Q.10 Is there any substantive evidence to indicate that the requirements of section 149 of the Equality Act 2010 have not been met?

### **Superseded Policies**

- Q.11 Whilst the submitted Plan in paragraph 1.18 and appendix 2 explains that the Plan will replace certain policies of the adopted local plans: namely the Core Strategy, and the Policies, Sites and Places Plan, is the Plan clear in identifying the policies (or parts of policies) of the existing development plan which would be superseded by the Plan consistent with Regulation 8(5) of the 2012 Regulations, and making clear those which would not be superseded?

### **Policy 'Purpose' sections of the Plan**

- Q.12 Do the Purpose sections of the Plan serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area?

### **Supplementary Planning Documents**

The Government has published the Levelling-up and Regeneration Act 2023 (Commencement No.11 and Saving and Transitional Provisions) Regulations 2026. Regulation 6(2) states that 'On and after the commencement date (25 March 2026),

an authority may continue to prepare and make arrangements for the adoption of a proposed Supplementary Planning Document (SPD), provided that the document is adopted no later than 30<sup>th</sup> June 2026’.

Q.13 What are the implications of this for the policies of the Plan?

## **Matter 2: Strategic Policies**

**Issue: Whether the strategic policies of the Plan would look ahead over a minimum of 15 years from adoption as per paragraph 22 of the National Planning Policy Framework (NPPF)?**

Q.14 Given the anticipated adoption date of the Plan as set out in the LPDP, would the strategic policies look ahead over a minimum of 15 years from adoption as per NPPF paragraph 22? What is the justification for this, and is the Plan positively prepared in this regard?

Q.15 Is the Plan seeking to establish a ‘plan period’ of 2026 to 2041 for all strategic policies, or different periods for different strategic policies, such as housing, accommodation for Gypsies and Travellers, and Travelling Showpeople, and employment land?

## **Matter 3: Effective cooperation**

**Issue: Whether the Council has maintained effective cooperation on strategic matters that cross administrative boundaries through plan making?**

Q.16 What is the evidence that the Council has maintained effective cooperation on strategic matters that cross administrative boundaries as per paragraphs 25 – 27 of the NPPF?

## **Matter 4: Strategic Principles and the Locational Strategy**

**Issue: Is the locational strategy positively prepared, justified, effective, and consistent with national policy?**

Q.17 What is the justification for the locational strategy as set out in Policy LPS2, is it positively prepared, consistent with national policy and would it be effective?

Q.18 What is meant by ‘additional protection’ in 4 b?

Q.19 Policy LPS2 refers to, or repeats other development plan requirements. Does this serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area?

## **Policy LPS1 – Strategic Policies**

The specific requirements of the Strategy Principles set out in LPS1 will be considered under other Matters where the relevant policies of the Plan are considered.

- Q.20 Many elements of Policy LPS1 appear to repeat other policies of the Plan. Does Policy LPS1 serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area?

### **Matter 5: Allocation site selection**

**Issue: Has the allocation of sites in the Plan been undertaken using an appropriate methodology for site selection, and would the approach taken with specific site allocations in the Plan be effective?**

Details relating to the specific site allocations will be considered in Matters 9, 10, 11, 13, 26, 27 and 28 and in this matter, we are concerned with the overall principles and methodology behind the selection of sites in the Plan.

- Q.21 Has the selection of sites for allocation (for the different types of land use) been undertaken using appropriate methodologies, and are the proposed site allocations in overall terms underpinned by relevant and up-to-date evidence, which is adequate and proportionate, focused tightly on supporting and justifying the proposed allocations, taking into account relevant market signals?
- Q.22 What account was taken of the need to conserve and enhance the landscape and scenic beauty of the Cotswolds National Landscape in site selection?

### **Matter 6: The Green Belt**

**Issue: Whether the Plan is justified, effective and consistent with national policy in relation to its approach to the Green Belt?**

- Q.23 Is Policy LPS1 consistent with national policy for Green Belts and would it be effective?
- Q.24 The Plan was prepared before the concept of 'grey belt' was introduced into national policy, and is being examined under an earlier version of the NPPF. Is it necessary for soundness for the Plan to be amended to deal with this (in a way which wouldn't unnecessarily protract the examination)?
- Q.25 At the strategic level, what are the exceptional circumstances for the alteration of Green Belt boundaries in the Plan? (Exceptional circumstances for the specific proposed site related Green Belt alterations are dealt with under the relevant matters).

- Q.26 What are the exceptional circumstances for the inseting of all or parts of the villages and settlements set out in LPS1 criterion 15?
- Q.27 What are the exceptional circumstances for the alteration of Green Belt boundaries arising from changes to settlement boundaries?
- Q.28 What if any compensatory improvements to the environmental quality and accessibility of remaining Green Belt land would take place as a result of the proposed Green Belt boundary alterations?

## **Matter 7: Housing**

**Issue: Is the proposed approach to housing development positively prepared, justified, effective, and consistent with national policy?**

### **Local Housing Need**

- Q.29 Policy LPS3 in part 1 says the Local Housing Need (LHN) for South Gloucestershire for the period 2026/27 to 2040/41 is 20,423 new homes, or 1,362 per annum. This is different to the minimum local housing need (1,287 homes per annum) calculated using the standard method set out in HN/01 Local Housing Needs Assessment 2025, and to that set out in HN/02 Local Housing Needs Assessment 2023 (1,366 homes per annum). Is LPS3 criterion 1 justified? Has LHN been calculated in a way consistent with national policy and guidance?
- Q.30 Is there any substantive evidence to demonstrate that it would be appropriate to plan for a higher housing need figure than the standard method indicates as per advice set out in the PPG (Paragraph: 010 Reference ID: 2a-010-20201216)? (Note we will discuss unmet need later in this matter).

### **Affordable Housing need**

- Q.31 Is there any substantive evidence to demonstrate that there should be an adjustment to the minimum housing requirement to help deliver affordable housing with regard to the PPG (Paragraph: 024 Reference ID: 2a-024-20190220), and if so, would that be effective?

### **Unmet housing need arising in the Bristol City Council area**

It is common ground between Bristol City Council and the Council that both authorities form part of the wider Bristol Housing Market Area. A level of unmet housing need to be accommodated in South Gloucestershire has not been established through statements of common ground as per NPPF 11 and footnote 6.

- Q.32 Has the level of unmet housing need of the Bristol City Council area (and/or any other relevant local authority area) been quantified, and if so, what is it?

- Q.33 Is there any substantive evidence that the Plan should be accommodating unmet need from neighbours, and if so, would it be sound to do so?
- Q.34 How much, if any, unmet housing need should the Plan be accommodating and what is the justification for that?
- Q.35 HN/01 Local Housing Needs Assessment 2025 sets out that LHN is 1,287 homes per annum, or 19,305 homes to 2041. The Councils housing land supply data (ID/04c) (to be tested in our examination) states that there would be 24,043 homes delivered over the plan period. In principle, would housing provision in excess of LHN contribute to any wider unmet needs in the housing market area, including the Bristol City Council area in any event? If so, should that be reflected in the Plan, and how?

### **Housing needs of different groups in the community**

- Q.36 Is the Plan positively prepared in assessing and reflecting in its policies the size, type and tenure of housing needed for different groups in the community as per NPPF 63?

### **The housing requirement**

- Q.37 The Plan sets a housing requirement of 20,423 homes. What is the justification for the proposed housing requirement, is it positively prepared, and has it been derived in a way which is consistent with national policy?
- Q.38 The Council set out in its Topic Paper (Policy LPS3 - Delivery of New Homes Confirming the Plan's Housing Need, Housing Requirement and Housing Supply (ST/04)) that the housing requirement should be 22,500 dwellings (1,500 per annum). This is said to be because of, amongst other things, the requirements of paragraph 78c of the 2024 NPPF. Given that the Plan is being examined against NPPF December 2023 (not NPPF 2024) and that paragraph 78c of the 2024 NPPF is clear that those provisions are for 'the purposes of decision-making only', would such a change be necessary for soundness or legal compliance?
- Q.39 If the submitted housing requirement of 20,423 homes is not sound, what would a justified housing requirement be?

### **Housing land supply**

The Council has provided updated housing land supply data (ID/04c) which indicates an overall housing supply for the plan period of 24,043 homes, with 2,939 homes to be provided beyond the plan period. We pose questions about the various components of supply below.

- Q.40 Given that housing land supply changes over time, is it effective to set out housing land supply in policy LPS3?

## Planning permissions

Q.41 What is the evidence that the existing planning permissions are either deliverable or developable as per the NPPF definitions?

## Allocations

Q.42 Whilst we will look specifically at the detail of the proposed allocations in other matters, what is the evidence that the proposed allocations are either deliverable or developable as per the NPPF definitions (also see PPG Paragraph: 007 Reference ID: 68-007-20190722)?

Q.43 Are the contributions towards housing land supply assumed for specific allocations in the trajectory justified? What is the expected timescale and rate of development from the respective sites and is it realistic?

Q.44 How were the site capacities determined? What assumptions have been made? Are these justified?

## Windfall

Q.45 What is the compelling evidence that windfall sites will make the anticipated contribution to housing land supply over the plan period? The latest housing land supply evidence includes a windfall allowance in the first three years of the Plan. Is this justified, and would including such supply in the trajectory duplicate commitments from planning permissions?

## Sites no larger than one hectare

Q.46 Would at least 10% of the housing requirement be accommodated on sites no larger than one hectare consistent with NPPF 70?

## Student and age friendly housing

Q.47 How have the proposed student housing and 'age friendly homes' in the Plan been included as part of the housing land supply?

## **Five-year housing land supply**

Q.48 What is the up-to-date supply of specific, deliverable housing sites in South Gloucestershire to be considered in the five-year housing land supply from the intended date of adoption? Will there be a five-year supply of deliverable housing sites on adoption of the Plan?

## **Matter 8: Settlement Boundaries**

**Issue: Is the approach to settlement boundaries justified, effective and consistent with national policy?**

### **LP2 Settlement Boundaries**

- Q.49 Is the principle of using settlement boundaries to direct and control the location of new development sound?
- Q.50 Is the approach to defining/reviewing the boundaries justified and effective?
- Q.51 Are the specific boundaries for the settlements justified and appropriately drawn in all instances?
- Q.52 Do the boundaries as drawn provide flexibility to respond to change and allow windfall development?
- Q.53 What is the justification for the approach to development outside the settlement boundaries in Policy LP2?
- Q.54 Is reference to housing delivery/land supply in criterion 3 of Policy LP2 justified and effective and does it duplicate national policy?
- Q.55 What is the justification for considering development over the preceding 15 years in criterion 4 of Policy LP2 and is this approach effective?

## **Matter 9: Strategic Urban Extensions**

**Issue: Are the proposed Strategic Urban Extensions justified, effective and consistent with national policy?**

### **LP5 New Woodlands**

- Q.56 What is the justification for the overall number of dwellings to be provided by Policy LP5, and from the individual component sites?
- Q.57 What is the justification for the affordable housing provision in criteria 3 and 11, and would this be effective?
- Q.58 Are the implementation requirements in criterion 13 justified and would they be effective?
- Q.59 What are the exceptional circumstances for the proposed alteration of the Green Belt boundaries, and are the proposed alterations justified?
- Q.60 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 148 of the NPPF?

- Q.61 What is the evidence that any significant impacts from the proposed development on the transport network, including the strategic road network and the local highway network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree?
- Q.62 Are the proposed transport mitigation measures set out in Policy LP5 justified and would they be effective?
- Q.63 What is the evidence that the site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination arising from historic landfilling activities?
- Q.64 Is the proposed allocation consistent with national policy for planning and flood risk as set out in paragraphs 165 – 175 of the NPPF?
- Q.65 Is the reference to Biodiversity Net Gain in criterion 5 necessary given Policy LP28 - Ecology and Biodiversity Net Gain? Are the BNG requirements in the policy and reasoned justification consistent?
- Q.66 What is the justification for the community and educational requirements set out in criterion 4?

#### **LP6 North Lyde 'ecotech' Village**

- Q.67 What is the justification for the overall number of dwellings and employment accommodation to be provided by Policy LP6, and from the individual component sites?
- Q.68 What is the justification for the affordable housing provision and self-build in criteria 2 and 10, and would this be effective?
- Q.69 Are the implementation requirements in criterion 11 justified and would they be effective?
- Q.70 What are the exceptional circumstances for the proposed alteration of the Green Belt boundaries, and are the proposed alterations justified?
- Q.71 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 148 of the NPPF?
- Q.72 What is the evidence that any significant impacts from the proposed development on the transport network, including the strategic road network and the local highway network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree?
- Q.73 Are the proposed transport mitigation measures set out in Policy LP6 justified and would they be effective?

- Q.74 What is the evidence that the site is suitable for its proposed use taking account of potential contamination?
- Q.75 Is the reference to Biodiversity Net Gain in criterion 5 necessary given Policy LP28 - Ecology and Biodiversity Net Gain? Are the BNG requirements in the policy and reasoned justification consistent?
- Q.76 What, if any effects would there be on the designated Strategic Green Infrastructure Network Corridor?
- Q.77 Would criterion 5 be effective in providing adequate separation between existing transport and energy infrastructure, and the oil depot and abattoir and the proposed development? In regard to existing land uses, what is the evidence that the agent of change principle as set out in paragraph 193 of the NPPF has been applied?
- Q.78 What is the justification for the community and educational requirements set out in criterion 3?

#### **LP7 Carsons Green and Rockhouse Farm New Neighbourhoods**

- Q.79 What is the justification for the overall number of dwellings to be provided by Policy LP7, and from the individual component sites?
- Q.80 What is the justification for the phased approach of the proposed allocations and would this be effective?
- Q.81 What is the justification for the affordable housing provision and/or self-build in criteria 3, 8 and 10, and would this be effective?
- Q.82 What are the exceptional circumstances for the proposed alteration of the Green Belt boundaries, and are the proposed alterations justified?
- Q.83 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 148 of the NPPF?
- Q.84 What is the evidence that any significant impacts from the proposed development on the transport network, including the strategic road network and the local highway network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree?
- Q.85 Are the proposed transport requirements set out in Policy LP7 justified and would they be effective?
- Q.86 What is meant by the setting of the PROW network in criterion 4?

- Q.87 Are the proposed land uses at the local centre as set out in criterion 5 justified?
- Q.88 Are the implementation requirements in criterion 17 justified and would they be effective?
- Q.89 Is the reference to Biodiversity Net Gain in criterion 5 necessary given Policy LP28 - Ecology and Biodiversity Net Gain? Are the BNG requirements in the policy and reasoned justification consistent?
- Q.90 What is the evidence that 'Field F5' is of high ecological value and what is the evidence that the impact of the proposed development on the SNCI has been carefully considered?
- Q.91 What is the evidence that the allocation is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination from historic mining?
- Q.92 What is the evidence that the site is suitable for its proposed use taking account of potential contamination from previous land uses?
- Q.93 Is Policy LP7 consistent with national policy for the historic environment and in particular the significance of the designated heritage assets listed in criterion 4?
- Q.94 Is the requirement in criterion 14 for design to respond to the archaeology in a creative way consistent with national policy, and is it clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?
- Q.95 Are the requirements in respect of development forms and site levels set out in criterion 13 justified and would they be effective? What is the evidence that the impact of the proposed allocations on visually important hillsides has been carefully considered?
- Q.96 How has flood risk been taken into account in defining the proposed allocations and would they be consistent with national policy and guidance in respect of development and flood risk?
- Q.97 Are the requirements in respect of the concept diagram, master plan and design codes justified and would they be effective?

### **LP8 North Warmley New Neighbourhood**

- Q.98 What is the justification for the overall number of dwellings to be provided by Policy LP8, and from the individual component sites?

- Q.99 What if any effect would the requirements under Section 16 of the Commons Land Act 2006 have for the deliverability of the site?
- Q.100 What is the justification for the affordable housing provision and self-build in criteria 3, 9, 10 and 11, and would this be effective?
- Q.101 What are the exceptional circumstances for the proposed alteration of the Green Belt boundaries, and are the proposed alterations justified?
- Q.102 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 148 of the NPPF?
- Q.103 What is the evidence that any significant impacts from the proposed development on the transport network, including the strategic road network and the local highway network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree?
- Q.104 Are the proposed transport requirements set out in Policy LP8 justified and would they be effective?
- Q.105 Is the requirement in criterion 14 for design to respond to the archaeology in a creative way consistent with national policy, and is it clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?
- Q.106 What is the evidence that the impact of the proposed allocations on the historic environment has been carefully considered?
- Q.107 Are the implementation requirements in criterion 15 justified and would they be effective?
- Q.108 Is the reference to Biodiversity Net Gain in criterion 5 necessary given Policy LP28 - Ecology and Biodiversity Net Gain? Is the reference to 15% BNG uplift in paragraph 5 of the reasoned justification justified?
- Q.109 What is the evidence that the allocation is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination from historic mining?
- Q.110 How has flood risk been taken into account in defining the proposed allocations and would they be consistent with national policy and guidance in respect of development and flood risk?
- Q.111 What is the evidence that the impact of the proposed allocations in terms of noise and air quality (with particular regard to the site's proximity to the Kingswood/Warmley Air Quality Management Area) has been carefully considered?

## **LP11 Major Sites Delivery Policy**

Q.112 Does Policy LP11 serve a clear purpose avoiding unnecessary duplication of policies that apply to a particular area, and is it clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?

## **Matter 10: Village Extensions**

**Issue: Are the proposed allocations justified, effective and consistent with national policy?**

### **LP4 Easter Compton Village Extensions**

Q.113 How was the extent of the proposed allocations defined, and is this justified?

The reasoned justification to Policy LP4 explains that the existing village and the new sites will be released from the Green Belt, as shown on the Policies Map.

Q.114 What are the exceptional circumstances for altering the boundaries of the Green Belt, and would the boundaries be defined clearly, in accordance with paragraph 148 of the NPPF?

Q.115 What is the evidence that any significant impacts from the proposed development on the transport network, including the strategic road network (with particular regard to M5 Junction 17) and the local highway network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree?

Q.116 Are the requirements for affordable housing and for financial contributions justified and, if so, would the site be deliverable?

Q.117 How has flood risk been taken into account in defining the proposed allocations and would they be consistent with national policy and guidance in respect of development and flood risk?

### **LP9 Charfield Village Extensions**

Q.118 Were the locations of the proposed allocations selected on a robust basis?

Q.119 How was the extent of the proposed allocations defined, and is this justified?

Q.120 What is the justification for the financial contributions sought towards the specific education requirements (expanded primary school and additional nursery places) set out in Policy LP9?

Q.121 Why is the proposed modification relating to primary care services necessary for soundness?

Q.122 What is the evidence that any significant impacts from the proposed development on the transport network, including the strategic road network and the local highway network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree?

The reasoned justification to Policy LP9 indicates that “the number of new dwellings in this part of the district is constrained by capacity and safety issues at M5 Junction 14. National Highways have agreed that up to 775 dwellings may be provided but only subject to the early implementation of an improvement scheme for the junction”.

Q.123 Will the necessary improvement scheme be solely funded through financial contributions? What is the anticipated timing for the implementation of the improvement scheme and what effect would this have on the deliverability of the scheme? Is the intention that the improvement scheme would be provided in advance of the development of the allocations?

Q.124 What is the justification for requiring improved foot and cycle paths for the Greenway, including connections to it?

Q.125 What is the justification for seeking funds for repairs to St James Church and is it consistent with the tests for planning obligations set out in national policy?

Q.126 What is the evidence that the development of the proposed allocations would be designed to avoid or minimise adverse impacts on the Cotswolds National Landscape?

Q.127 What is the evidence that the proposed allocations would be viable?

### **LP10 Almondsbury Village Extension**

Policy LP10 requires development proposals to ensure a new robust Green Belt boundary along the southern and western edge of the developable area of the allocation.

Q.128 What are the exceptional circumstances for altering the boundaries of the Green Belt, and would the boundaries be defined clearly, in accordance with paragraph 148 of the NPPF?

Q.129 Was the location of the proposed allocation selected on a robust basis?

Q.130 How was the extent of the proposed allocations defined, and is this justified?

Q.131 What is the justification for the financial contributions sought towards the specific education requirements (nursery, primary, secondary and special education needs) set out in Policy LP10?

Q.132 What is the justification for requiring the provision of a mobility hub including provision of electric bikes and scooters for hire, and a cycle repair shop or service? Is the proposed modification to criterion 5 necessary for soundness?

Q.133 Policy LP10 requires development proposals to achieve a minimum of 10% BNG on site. The reasoned justification (paragraph 3) adds that “the creation and good management of traditional orchards, lowland mixed-deciduous woodland, scrub and species rich hedgerows should be prioritised accordingly to receive a 15% BNG uplift”. Is the proposed modification to criterion 3 of Policy LP10 justified and necessary for soundness?

### **Matter 11: Other sites with a specific Local Plan Policy**

**Issue: Are the proposed allocations justified, effective and consistent with national policy?**

#### **LP12 University of the West of England (UWE), Frenchay Campus**

The reasoned justification to Policy LP12 states that UWE has an ambition to provide specialist student accommodation for c3,000 bed spaces to meet the needs of students within its Frenchay campus. Is this consistent with other policies in the Plan, which have allocated an additional 1,500 student bedspaces?

Q.134 The ‘purpose’ section of Policy LP12 refers to UWE’s long-term aim to consolidate its activities at Glenside and Bower Ashton onto its primary campus at Frenchay. Has the Council given consideration to the future of these sites? Will existing employment uses on these sites be safeguarded?

Q.135 Will Policy LP12 and Site Allocation NF3 be effective in helping to achieve sustainable development on the Frenchay Campus?

Q.136 In asking proposals for specialist student accommodation to make appropriate provision to health care, and other public services as required, is Policy LP12 clearly written and unambiguous, so it is evident how a decision maker should react to development proposals, and will it be effective?

Q.137 What is the evidence that any significant impacts from the proposed development on the transport network, including the strategic road network and the local highway network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree?

#### **LP13 Land at former Filton Airfield – Brabazon**

Q.138 Is Policy LP13 clearly written and unambiguous, so that it is evident how a decision maker should react to development proposals, particularly given that it would partially supersede Policy CS26 of the South Gloucestershire Core Strategy? Is it clear as to what part of Policy CS26 would be superseded?

Q.139 What is the evidence that any significant impacts from the proposed development on the transport network, including the strategic road network and the local highway network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree?

Policy LP13 states that a new railway station, metrobus route, active travel measures and key links to support 3,675 homes based on existing transport schemes secured in the CPNN Infrastructure Delivery Plan (IDP).

Q.140 Is Policy LP13 clearly written and unambiguous, so that it is evident how a decision maker should react to development proposals by requiring compliance with an IDP which is not part of the development plan for the area?

Q.141 What is the evidence that a new railway station site would be secured? Is there a reasonable prospect that the railway station would be delivered in the plan period? If so, are the specific requirements and costs known? What, if any, are the implications of the railway station not being delivered?

#### **LP14 Severnside Employment Area**

Q.142 Is the overall approach to the Severnside Employment Area effective, justified and consistent with national policy?

Q.143 Does the policy effectively address Severnside's relationship with neighbouring employment areas in adjoining local authorities?

Q.144 What account does the policy take of the emerging employment land work being undertaken by the West of England Combined Authority (WECA)?

Q.145 What is the justification for the extent of the site area and how were the boundaries determined? Does the policy make it clear that the geographic application of Severnside is illustrated on the Policies Map?

Q.146 Given that the area covered by Policy LP14 Severnside is also to be designated as a Safeguarded Employment Area under Policy LPS7, is there any duplication between the policy requirements of these two policies?

Q.147 Would the proposed development at Severnside result in any significant impacts on the transport network, including the Strategic Road Network (in terms of capacity and congestion) or on highway safety, and if so, can any such impacts be effectively mitigated to an acceptable degree?

Q.148 To what extent is the implementation of the allocation dependent upon provision of the link road to Junction 1 of the M49 and is this a matter that should be addressed by the policy wording?

- Q.149 Is the intended approach to the Severnside spine road set out in paragraph 19 of the reasoned justification justified and supported by relevant evidence?
- Q.150 Would the Severnside Package set out in Policy LPS9 Sustainable Movement and Transport Infrastructure be effective?
- Q.151 Is the proposed allocation (and wording of criterion 2b of the policy) consistent with national guidance in terms of flood risk set out at paragraphs 165 to 175 of the NPPF?
- Q.152 The purpose section of LP14 states that land east of the B4055 Pilning Station is an additional proposed site allocation to complement Severnside Employment Area and provide further grow on space. It is identified as site SEA45g but is also included as site PSB4 in Appendix 1 of the Plan (Site Allocation Development Principles). In the absence of a policy within the Plan to allocate site PSB4 for development (or its inclusion as part of Policy LP14), is the Plan effective?
- Q.153 Is the proposed allocation PSB4 justified and effective and what regard has it had to the emerging Pilning and Severn Beach Neighbourhood Plan?
- Q.154 What are the exceptional circumstances for the proposed alteration of the Green Belt boundaries in relation to PSB4 and are the proposed alterations justified?
- Q.155 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 148 of the NPPF?
- Q.156 Policy LPS1 Strategy Principles criterion 8 refers to existing employment areas being safeguarded and Core Strategy paragraph 9.3 refers to the economic strategy objectives of safeguarding existing economic development areas. Is it effective for the site at PSB4 to be considered as a Safeguarded Employment Area under Policy LPS7 when it does not yet exist?
- Q.157 What is the intended purpose of the development considerations in Appendix 1 of the Plan concerning PSB4 and is it effective for these to be absent from Policy LP14?
- Q.158 Are all the development considerations justified and effective?
- Q.159 Do the development considerations have regard to the overhead cable route affecting the site?
- Q.160 Do the development considerations have regard to the ecological importance of the area and the potential for development to affect the Severn Estuary?

## **Matter 12: Gypsies and Travellers and Travelling Showpeople**

### **Issue: Is the Plan positively prepared and would it be effective in addressing the likely accommodation needs of Gypsies and Travellers and Travelling Showpeople?**

See our letter ID/07 dated 13 February 2026 and the Council's response (ID/07a) of 5 March 2026.

This matter concerns Policies LPS1 Strategy Principles (criterion 6), LPS5 accommodation for Gypsies and Travellers and LPS6 accommodation for Travelling Showpeople.

### **Need and Requirement**

- Q.161 In line with paragraph 31 of the NPPF, are the Gypsy and Traveller and Travelling Showpeople policies in the Plan underpinned by relevant and up-to-date evidence?
- Q.162 Is the evidence in the Gypsy and Traveller Accommodation Assessment November 2023 (GTAA) relating to needs (which dates to November 2023 and relies on data with a baseline of January 2022) at risk of having been overtaken by events? Does it provide a realistic and robust assessment of the needs of these communities?
- Q.163 Since the GTAA pre-dates the introduction of the updated Planning Policy for Traveller Sites (12 December 2024) does it have regard to the specific definitions in the PPTS and the Smith judgement in assessing need?
- Q.164 With our responsibilities under the Equality Act 2010 in mind, does the approach to the need for Gypsy and Traveller and Travelling Showpeople accommodation avoid discrimination?
- Q.165 Paragraph 11b of the NPPF states that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses. In terms of Gypsies and Travellers, and Travelling Showpeople the approach to need, requirement and supply does not appear to be set out in the Plan? Is this effective and consistent with national policy?
- Q.166 The need for Gypsies and Travellers and Travelling Showpeople is indicated in the reasoned justification for Policies LPS5 and LPS6 to be based on the period 2022 to 2042, whilst the Plan period is indicated to be 2026 to 2041 (as set out in the Plan, including the Purpose section to Policy LPS2). What account has been taken of differences in these time periods?
- Q.167 Is the Plan's approach to transit provision justified and effective?

## **Supply**

Note: The individual safeguarded sites and allocations for Gypsies and Travellers and Travelling Showpeople will be considered under Matter 13.

- Q.168 Is the approach to the provision of sites for Gypsy and Travellers and Travelling Showpeople positively prepared, justified and consistent with national policy and will it provide a future supply that is sufficient and suitable to meet identified needs?
- Q.169 Is the proposed provision for 99 new pitches for Gypsies and Travellers and 15 new plots for Travelling Showpeople through the Plan (as set out in criterion 6 of Policy LPS1) justified and would it be effective?
- Q.170 What is the evidence that there would be on adoption of this Plan a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against locally set targets, and a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15 as required by the Government's Planning Policy for Traveller Sites?
- Q.171 Is the approach to safeguarded sites effective, justified and consistent with national policy? How do the safeguarded sites identified in the Plan relate to the proposed allocations?
- Q.172 What are the exceptional circumstances for the proposed alterations to the Green Belt boundaries in relation to the safeguarded sites for Gypsy and Traveller and Travelling Showpeople accommodation and the allocations? (see Green Belt Exceptional Circumstances Topic Paper GB/04 appendices IV and V).

## **Policy wording for LPS5 accommodation for Gypsies and Travellers**

- Q.173 Is Policy LPS5 as drafted justified and effective?
- Q.174 Would the proposed policy criteria be effective in bringing forward sites necessary to meet the identified need for pitches?
- Q.175 Are the criteria clear and unambiguous such that it is evident to a decision maker how they should react to development proposals for Gypsy and Traveller accommodation?
- Q.176 What purpose does the final criterion of Policy LPS5 regarding windfall sites serve, and does it duplicate the first criterion of the policy which deals with proposals for Gypsy and Traveller sites generally?
- Q.177 Do the other general assessment criteria duplicate the requirements of other policies in the Plan, or other plans, or the NPPF? How will desirable criteria be dealt with in practice?

Q.178 Is the duplication of policy wording in the reasoned justification necessary or effective?

### **Policy wording for LPS6 accommodation for Travelling Showpeople**

Q.179 Is Policy LPS6 as drafted justified and effective?

Q.180 Would the proposed policy criteria be effective in bringing forward sites necessary to meet the identified need for plots?

Q.181 Are the criteria clear and unambiguous such that it is evident to a decision maker how they should react to development proposals for Travelling Showpeople accommodation?

Q.182 What purpose does the final criterion of Policy LPS6 regarding windfall sites serve, and does it duplicate the first criterion of the policy which deals with proposals for Travelling Showpeople sites generally?

Q.183 Do the other general assessment criteria duplicate the requirements of other policies in the Plan, or other plans, or the NPPF? How will desirable criteria be dealt with in practice?

Q.184 Is the duplication of policy wording in the reasoned justification necessary or effective?

### **Matter 13 – Sites for Gypsies and Travellers and Travelling Showpeople**

**Issue: Whether the individual safeguarded sites and allocations for Gypsy and Traveller and Traveling Showpeople are justified, effective and consistent with national policy.**

#### **Safeguarded Sites for Gypsies and Travellers LPS5 Schedule 1**

Q.185 Is the approach to safeguarded sites effective, justified and consistent with national policy? How do the safeguarded sites identified in the Plan relate to the proposed allocations?

Q.186 What are the exceptional circumstances for the proposed alterations to the Green Belt boundaries in relation to the safeguarded sites with an asterisk in the list below? (see Green Belt Exceptional Circumstances Topic Paper GB/04)

**1. Appletrees, New Street, Charfield**

**2. Bank Road, Pilning\* (Meadow View)**

Q.187 What is the planning status of this site? How many pitches are located there?  
Why was the site not included in Schedule 2 for intensification?

3. **Berwick Park, Berwick Lane, Easter Compton\***
4. **Bridge View, Westerleigh Road, Westerleigh\***
5. **Burton Road, Tormarton (2 sites)**
6. **Bury Hill, Hambrook\***
7. **Caravan near Aust Services, Sandy Lane, Aust\***
8. **Cottage View, Gloucester Road, Almondsbury\***
9. **Elm Farm, Westerleigh Road, Westerleigh\***
10. **Frampton Park (Cog Mill), Bristol Road, Frampton Cotterell\***
11. **Green Orchards, Berwick Lane, Easter Compton\***
12. **Greengate Yard, Shortwood Hill, Pucklechurch\***
13. **Henfield Paddock, Henfield Road, Coalpit Heath\***
14. **Highwood Park, Highwood Road, Patchway (Council-owned)**
15. **Hill View, Badminton Road, Nibley\***
16. **Land adjacent to Tormarton Road and Rushmead Lane**
17. **Land at Giddy End, High Lane, Winterbourne\***
18. **Land at Henfield Road, Coalpit Heath\***
19. **Land at Marsh Common Road\***
20. **Land at Northwick Road, Pilning\***

Q.188 Is the site address correct?

21. **Land north of Lime Kiln Court\***
22. **Land South Of The Northwick Road And Bank Road Junction, Pilning\***
23. **Meadow View, Bristol Rd, Frampton Cotterell\***
24. **Meadow View, Shortwood Road, Pucklechurch\***
25. **Moor Paddock, Westerleigh Road\***
26. **Northwood Park, Old Gloucester Road, Winterbourne\* (Council-owned)**
27. **Orchard Farm, Pomphrey Hill, Mangotsfield\***
28. **Parkfield Road, Pucklechurch (2 sites)\***
29. **Shannon Parks, Tanhouse Lane, Yate**

- 30. Shortwood Road, Pucklechurch\***
- 31. Shortwood Yard, Shortwood Hill, Pucklechurch\***
- 32. Siston Lane (2 sites), Pucklechurch\***
- 33. Stone Acre, Norley Lane, Tormarton**

Q.189 What is the planning status of this site? Why was the site not included in Schedule 2 for intensification?

- 34. Swan Lane, Winterbourne (3 sites)\***
- 35. The Conifers, Oldbury Lane**
- 36. The Meadows, Parkfield, Pucklechurch\***
- 37. The Plaza, Northwick Road, Pilning\***
- 38. Tytherington Road Nursery, Tytherington Road**
- 39. Westerleigh Road, Mangotsfield**
- 40. Willows, Latteridge Road, Iron Acton\***
- 41. 1 Dibden Lane, Emersons Green**
- 42. 56 Ram Hill, Coalpit Heath\***

### **Allocations for Gypsies and Travellers LPS5 Schedule 2**

Q.190 The Plan does not include specific site allocation policies or development considerations for the proposed Gypsy and Traveller and Travelling Showpeople allocations (which are included in GTTS/02). Is the Plan effective in this regard?

Q.191 Is there any evidence to suggest that any of the proposed sites listed below should not be allocated?

Q.192 Are the proposed allocations justified in light of the potential constraints, infrastructure requirements and adverse impacts?

Q.193 What are the exceptional circumstances for the proposed alterations to the Green Belt boundaries in relation to the sites proposed for allocation?

### **Sites for intensification Schedule 2a**

#### **Berwick Park, Berwick Lane (GT101)**

Q.194 Would the intensification of the site be consistent with national policy and guidance in respect of flood risk?

**Henfield Paddock, Henfield (GT102)**

**Hill View, Badminton Road, Nibley (GT103)**

**Frampton Park, Bristol Road (GT104)**

**Land North of Lime Kiln Court, Tytherington (GT105)**

**Moor Paddock, Westerleigh Road, Pucklechurch (GT106)**

**The Willows, Latteridge Road (GT107)**

Sites for expansion Schedule 2b

**Green Orchards, Berwick Lane (GTE01)**

Q.195 Would the expansion of the site be consistent with national policy and guidance in respect of flood risk?

**The Conifers, Oldbury Lane (GTE02)**

**The Meadows, Parkfield (GTE03)**

New sites to meet identified social need Schedule 2ci

**Land at Foxhole Lane and B44461 (GTPU01)**

Q.196 What is the evidence that any significant impacts from the proposed development on the transport network, or on highway safety, can be cost effectively mitigated to an acceptable degree?

Q.197 Is the site in a sustainable location, in respect of its access to key services and facilities?

**Doynton Lane, Doynton (GTPU02)**

Q.198 What is the evidence that any significant impacts from the proposed development on the transport network, or on highway safety, can be cost effectively mitigated to an acceptable degree?

Q.199 Is the site in a sustainable location, in respect of its access to key services and facilities?

Q.200 Would the proposed allocation be consistent with national policy and guidance in respect of flood risk?

Q.201 What is the evidence that the proposed development would be sensitively located and designed to avoid or minimise adverse impacts on the Cotswolds National Landscape?

**Froglands Cross, Old Gloucester Road (GTPU03)**

**Land at Peg Lane, Pucklechurch (GTPU04)**

Q.202 What is the evidence that any significant impacts from the proposed development on the transport network, or on highway safety, can be cost effectively mitigated to an acceptable degree?

Q.203 Having particular regard to noise and air quality, what is the evidence that any potential adverse impacts could be mitigated to an acceptable degree, to ensure that satisfactory living conditions are provided for future occupiers?

**Rectory Lane, Cromhall (GTPU05)**

Q.204 What is the evidence that any significant impacts from the proposed development on highway safety can be mitigated to an acceptable degree?

**The Firs, Swan Lane (GTPU06)**

**Tormarton Road, Marshfield (GTPU07)**

Q.205 What is the evidence that the development of the proposed allocation would be designed to avoid or minimise adverse impacts on the surrounding landscape, including the Cotswolds National Landscape?

**Land adjacent to Northwood Park (GTPU08)**

New sites to meet identified private need Schedule 2cii

**Land at Beech House, Iron Acton (GTNS01)**

**Land at Church Lane, Rangeworthy (GTNS02)**

Q.206 What is the evidence that the impact of the proposed allocation on the historic environment has been carefully considered?

Q.207 What is the evidence that any potential adverse impacts on the living conditions of neighbouring residents can be mitigated to an acceptable degree?

**Land at Commonmead Lane, Old Sodbury (GTNS03)**

**Land at Henfield Road (GTNS04)**

**Land opposite Green Orchards, Berwick Lane (GTNS05)**

## **Safeguarded Sites for Travelling Showpeople LPS6 Schedule 1**

Q.208 Is the approach to safeguarded sites effective, justified and consistent with national policy? How do the safeguarded sites identified in the Plan relate to the proposed allocations?

Q.209 What are the exceptional circumstances for the proposed alterations to the Green Belt boundaries in relation to the safeguarded sites with an asterisk in the list below? (see Green Belt Exceptional Circumstances Topic Paper GB/04)

- 1. Acres Fair, North Road, Yate**
- 2. Beanwood Park, Wapley\***
- 3. Engine Common Lane, Yate**
- 4. Fairlands, Earthcott Green, Almondsbury\***
- 5. Homefield, Hall End Lane, Wickwar**
- 6. Land at Cotswold Road, Chipping Sodbury**
- 7. Land at Park Lane, Frampton Cotterell**
- 8. Land West of Pound Mill Business Centre**
- 9. Oakleigh Green Farm Lane\***
- 10. The Burgage, Chipping Sodbury**
- 11. The Firs, The Causeway, Coalpit Heath**
- 12. The Maples, Maple Ridge Lane, Yate**
- 13. The Orchards, Bristol Road, Cromhall**
- 14. The Willows, Frog Lane, Coalpit Heath\***
- 15. The Willows, Hall End Lane, Wickwar**
- 16. Willowcrest, North Road, Yate**

## **New Site for Travelling Showpeople LPS6 Schedule 2**

### **Land at Leigh Farm, Pucklechurch (TSP01)**

Q.210 The Plan does not include a specific site allocation policy or development considerations for the proposed Travelling Showpeople allocation TSP01 (which is included in GTTS/02). Is the Plan effective in this regard?

Q.211 Is there any evidence to suggest that the site should not be allocated? Is it justified in light of the potential constraints (including the Green Belt), infrastructure requirements and any adverse impacts?

## **Matter 14: Homes for all**

**Issue: Are the individual policies clear, justified and consistent with national policy and will they be effective?**

### **LP1 Making Effective Use of Land in Urban and Town Hubs**

Policy LP1 requires development proposals for new homes within Urban and Town Hubs to optimise the use of land, by specifying density ranges for different areas.

The South Gloucestershire Council Density and Character Study – January 2022 (EEL/01) provides the main evidence in this regard.

Paragraph 124 of the NPPF expects planning policies to support development that makes efficient use of land, whilst taking into account the identified need for different types of housing and other forms of development; local market conditions and viability; the availability and capacity of infrastructure and services; the desirability of maintaining an area's prevailing character and setting and the importance of creating well designed places.

Q.212 Are the density ranges set out in Policy LP1 – Table 1 and designated on the Policies Map justified, and will they be effective in helping to meet the identified needs for housing in an appropriate way that is consistent with national policy, having particular regard to paragraph 123 of the NPPF?

Q.213 Is criterion 2f justified and consistent with national policy, with particular regard to conserving and enhancing the historic environment?

Q.214 What is the justification for the application of the Nationally Described Space Standards in 2.a? Does this requirement duplicate the provisions of Policy LP18?

Q.215 What is the justification for requiring all major development proposals to be supported by a density and character appraisal, as set out in criterion 2h of Policy LP1?

Q.216 Is Policy LP1 clear in suggesting that residential development is acceptable at Cribbs Causeway shopping centre? Is the designation of Cribbs Causeway as an 'Urban and Town Hub' justified?

### **LP3 Residential Development in the Countryside**

Policy LP3 defines the circumstances in which development proposals for new dwellings will be considered appropriate in the open countryside, beyond settlement boundaries and away from any allocated or safeguarded sites.

Q.217 What is the justification for criterion 3.e, which states that 'buildings of modern and or utilitarian construction, materials, buildings of substandard quality and incongruous appearance will not be considered appropriate for residential conversion', and is this consistent with national policy?

Q.218 In order to be effective, should the Plan be modified to make it clear whether Policy LP3 applies to sites located within the Green Belt?

Q.219 What is the justification for criterion 3.f, which requires buildings to have been used for their intended purpose for a minimum period of 10 years, in most circumstances, and would it be effective given the imprecise nature of the wording?

Q.220 Is criterion 3g clearly written and unambiguous, so it is evident how a decision maker should react to development proposals given the wording about 'very modest extensions'?

### **LPS4 Affordable Homes**

Q.221 What is the up to date evidence in respect of whether the requirements of Policy LPS4 could be viably met?

Q.222 Is Policy LPS4 clearly written and unambiguous, so that it is evident how a decision maker should react to development proposals that fall in more than one 'site type' category?

Q.223 Are the thresholds for the provision of affordable housing set out in Policy LPS4 justified, and would they be effective in meeting the affordable housing needs of the area?

Q.224 What is the justification for setting a 50% affordable housing requirement for unallocated and windfall Green Belt sites?

Paragraph 13 of the reasoned justification to Policy LPS4 indicates that the Affordable Homes policy applies to all self-contained dwellings, regardless of Use Class. This includes specialist residential developments that also provide care and support and communal facilities such as a residents' lounge or a restaurant, and non-campus-based student accommodation.

Q.225 Is Policy LPS4 clearly written and unambiguous so that it is evident how a decision maker should react to development proposals affecting all sites for 10 or more self-contained dwellings? Should paragraph 13 be included in the policy to make sure it is effective?

Q.226 Is Policy LPS4 clearly written and will it be effective in helping to meet the identified need for purpose built student accommodation in appropriate locations?

Q.227 Is paragraph 6 of Policy LPS4 clearly written and unambiguous, so that it is evident how a decision maker should interpret 'in exceptional circumstances and where it can be robustly justified'?

Q.228 What is the justification for paragraph 7, which requires throughout the build-out period for the viability of the development and the availability of public subsidy or other forms of investment to be periodically reviewed? Will this be effective?

Q.229 Paragraph 12 requires 5% of the Affordable Homes to be provided as Self and Custom-build that meets the Affordable Housing definition in the NPPF and the definition of a Self-Build or Custom build home in the NPPG. This should be delivered as Affordable Self and Custom Build homes. Is this justified by evidence of need and viability?

Q.230 Is paragraph 12 of Policy LPS4 clearly written and unambiguous, so that it is evident how a decision maker should interpret 'in exceptional circumstances, and where it can be robustly justified'?

The reasoned justification (paragraph 31) to Policy LPS4 refers to a Self and Custom Build SPD.

Q.231 Given the provisions of the Levelling-up and Regeneration Act 2023 (Commencement No.11 and Saving and Transitional Provisions) Regulations 2026 concerning the preparation of SPD, is the policy effective in this regard?

### **LP15 Houses in Multiple Occupation**

Q.232 What is the justification for criterion 2.c.ii, which defines a harmful and inappropriate concentration of HMOs in a locality, as more than 20% of households within a 100m radius of the application property being in use as licensed/licensable HMOs?

### **LP16 Age-friendly Housing and Care Homes**

Q.233 What is meant by age-friendly housing and would the policy be effective in this regard?

One of the objectives of the Plan is to provide a choice of 'age-friendly' homes to meet the aspirations of older people and any specialist housing need.

Criterion 2 of Policy LP16 sets out requirements for Housing with Care to be provided on the Strategic Urban and Village Extensions listed in paragraph 13 of the reasoned justification to the policy.

Q.234 What is the justification for restricting the type of age-friendly housing to 'Housing with Care' on these particular sites?

Q.235 Is Policy LP16 consistent with the NPPF and will it be effective in meeting the identified housing needs for older people over the Plan period?

## **LP17 Rural Exception Sites and Community Led Development**

Section 245 (Protected Landscapes) of the Levelling-Up and Regeneration Act 2023 (LURA) amends the duty on relevant authorities in respect of their functions which notably affect land in National Landscapes. Relevant authorities must now 'seek to further' the statutory purposes of Protected Landscapes. Paragraph 182 of the NPPF states that 'great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues'.

Q.236 Is Policy LP17d consistent with national policy and how have the requirements of the duty been met?

Q.237 Does Policy LP17 avoid unnecessary duplication of policies that apply to a particular area, with regard to the Green Belt for instance?

The Glossary to the NPPF defines rural exception sites as small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Paragraph 73 of the NPPF makes it clear that these sites should be on land which is not already allocated for housing and should, amongst other things, be adjacent to existing settlements. Footnote 37 to the NPPF adds that entry-level exception sites should not be larger than one hectare in size or exceed 5% of the size of the existing settlement.

Q.238 Policy LP17 supports development proposals for Rural Exception Sites or Community Led Development(s) within and around villages and settlements, where their primary purpose is to provide new Affordable Homes, and subject to a number of criteria. Criterion 1f) requires the overall scheme to have the clear support from the local community through evidenced consultation and a local housing needs survey. Is this consistent with national policy and will it be effective?

## **LP18 Internal Space and Accessibility Standards**

Q.239 With particular regard to the PPG, what is the justification for the requirement for new dwellings to accord with the nationally described space standard (NDSS)? Does this policy duplicate the requirements of policy LP18?

Q.240 What is the justification for the application of the M4(2) accessible and adaptable dwellings standard for all new housing?

Q.241 What is the evidence that the Council has considered the impact of internal space and accessibility standards in terms of Local Plan viability and any effects on the affordability of new homes?

## **Matter 15: Delivering jobs and prosperity**

**Issue: Is the strategy and provision for employment development effective, justified and consistent with national policy?**

### **LPS1 Strategy Principles (criterion 8)**

Q.242 Paragraph 11b of the NPPF states that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses. The approach to employment land need, requirement and supply does not appear to be set out in the Plan? Is this effective and consistent with national policy?

Q.243 The total requirement for 156 to 184 hectares of employment land set out in the Future Economic Needs Assessment (FENA) Addendum October 2025 (EMP/02a) is based on the period 2023 to 2043, whilst the Plan period is indicated to be 2026 to 2041 (as set out in the Plan, including the Purpose section to Policy LPS2). What account has been taken of differences in these time periods in the employment land requirement?

Q.244 Is the employment land requirement based on a robust and up to date assessment of both quantitative and qualitative need and is it positively prepared, justified and consistent with national policy?

Q.245 Is the approach to the provision of employment land supply positively prepared, justified and consistent with national policy and will it provide a future supply that is sufficient and suitable to meet identified needs?

Q.246 Is the proposed allocation of 48.1 hectares of employment land through the Plan justified and would it be effective?

Q.247 What are the exceptional circumstances for the proposed alterations to the Green Belt boundaries in relation to the employment allocations?

### **LPS7 Safeguarded employment areas**

Q.248 Is the approach to safeguarded employment areas effective, justified and consistent with national policy?

Q.249 What is the purpose of the safeguarded employment areas and how have they been identified? Is the designation intended to safeguard existing employment areas?

Q.250 How do the safeguarded employment areas identified in the Plan relate to the proposed employment allocations?

- Q.251 Are the safeguarded employment areas intended to contribute to the supply of employment land in terms of meeting the requirement?
- Q.252 Is Policy LPS7 as drafted justified and effective and is it consistent with existing Policy PSP27 (which directs B8 storage and distribution uses to safeguarded employment areas)?
- Q.253 How do criteria 3-5 concerning specific safeguarded employment areas relate to the site specific policies for those areas (LP6, LP7, LP12, LP13)?
- Q.254 Is the duplication of policy wording in the reasoned justification necessary or effective?
- Q.255 Does the Policy allow sufficient flexibility in line with paragraph 86d of the NPPF (which requires policies to be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices, and to enable a rapid response to changes in economic circumstances), and is it clear and effective?
- Q.256 What is the justification for different approaches in the East Fringe Urban Areas and outside the East Fringe Urban Areas in criteria 6 and 7? (Is this the 'additional protection' referred to in LPS2 criterion 4b?)
- Q.257 Do the other general assessment criteria set out in criterion 9 duplicate the requirements of other policies in the Plan, or other plans, or the NPPF?

### **LPS19 Non-safeguarded Employment Sites**

- Q.258 Is the policy approach to proposals for non-economic development uses within other employment sites which are not safeguarded, justified and effective, and is it consistent with national policy?
- Q.259 Does Policy LPS19 allow sufficient flexibility should no economic uses be found to be viable, and is it clear and effective?
- Q.260 Is the Policy consistent with paragraph 127 of the NPPF which requires local planning authorities to take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs?

### **LPS20 Employment and Skills Development**

- Q.261 Paragraph 16 of the NPPF requires policies to be clearly written and unambiguous so that it is evident how a decision maker should react to development proposals. Would criterion 1 be effective in ensuring development enables local residents to benefit from employment and training

opportunities arising from new major developments, and is such a requirement justified?

Q.262 Is the requirement to submit an employment and skills plan, including the thresholds identified, justified?

Q.263 What purpose would the employment and skills plans serve, and how would they be secured and managed?

Q.264 What are the implications of the requirement for employment and skills plans in terms of viability and have these been considered?

### **Matter 16: Town centres, leisure and cultural facilities**

**Issue: Is the strategy and provision for town centres and leisure and cultural facilities clear, justified and consistent with national policy and will it be effective?**

#### **LPS8 Town centres, retail and leisure**

Q.265 Paragraph 20a of the NPPF indicates that strategic policies should set out an overall strategy for the pattern, scale and design of places and make sufficient provision for amongst other things, retail and other commercial development. Is the Plan's approach to town centres, retail and leisure justified by the evidence set out in the Retail and Town Centre Planning Policy Matters Topic Paper (February 2025).

Q.266 Is the identification of 12 designated town centres and 58 local centres in the Plan justified, effective and consistent with Para 90a of the NPPF which indicates that planning policies should define a network and hierarchy of town centres and promote their long term vitality and viability?

Q.267 Does policy LPS8 make it clear that the geographic application of the various centres is illustrated on the Policies Map?

Q.268 What is the justification for the defined boundaries of the town centres, local centres and primary shopping areas? Are they based on up-to-date evidence?

Q.269 Is the network and hierarchy of centres (and out of centre locations) set out in criteria 1 to 3 sufficiently comprehensive, justified and in accordance with national policy?

Q.270 In dealing with primary shopping areas in criteria 4 and 5, is the policy consistent with the NPPF? Is the approach to residential use at ground floor level in criterion 5 consistent with paragraph 90f of the NPPF?

- Q.271 Is it evident to a decision maker how they should react to development proposals for the development included in criterion 6? And how will they ensure that the aspirations of the policy are met?
- Q.272 Is the approach to edge of centre and out of centre development in criterion 8 justified and consistent with the NPPF?
- Q.273 Is the approach in criterion 9 to establish a locally set impact assessment threshold of 350 square metres of floorspace justified, in line with national policy and would it be effective? How does it relate to Policies Sites and Places Plan Policy PSP31?
- Q.274 Is the approach to local centres and small scale facilities in criteria 10 to 12 justified? What is the justification for the radius in criterion 11? How does the policy relate to Policies Sites and Places Plan Policy PSP32 concerning local centres, parades and facilities?
- Q.275 Is the approach to markets and garden centres in criteria 13 and 14 justified, effective and consistent with national policy?
- Q.276 Are the general assessment criteria in criterion 15 effective and do any of them duplicate other parts of the policy, the Plan overall, other plans or national guidance?

### **LP21 Major Stadia**

- Q.277 Is the overall approach to major stadia clear, effective and justified?
- Q.278 Are all the criteria justified and effective and do any of them duplicate other parts of the policy, the Plan overall, other plans or national guidance?

### **Matter 17: Transport**

#### **Issue: Is the transport strategy of the Plan, and the individual policies clear, justified and consistent with national policy and would they be effective?**

- Q.279 Is the transport strategy of the Plan underpinned by relevant and up-to-date evidence, which is adequate and proportionate, focused tightly on supporting and justifying the Policy, taking into account relevant market signals?
- Q.280 Would the Plan give rise to any significant impacts from development on the transport network, including the Strategic Route Network (in terms of capacity and congestion), or on highway safety, and if so, can any such impacts be cost effectively mitigated to an acceptable degree?
- Q.281 What, if any evidence is there that the overall levels of development proposed in the Plan should be prevented on highways grounds because there would

be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe?

### **LPS9 Sustainable Movement and Transport Infrastructure**

Q.282 Given the requirements of the Building Regulations, do the requirements for electric vehicle infrastructure in criterion 3 e serve a clear purpose, and avoid unnecessary duplication of policies that apply to a particular area?

Q.283 Are the strategic infrastructure interventions to deliver Local Plan growth subject to criteria 5 and 6 of LPS9 justified and would they be effective?

Q.284 Is criterion 7 clearly written and unambiguous, so it is evident how a decision maker should react to development proposals given that it relates in part to other strategic transport measures that may emerge through the Joint Local Transport Plan or its replacement/successor, documents which in any event are not part of the development plan?

Q.285 Consistent with NPPF 110 c what is the robust evidence for the safeguarding provisions in criteria 7 to 9?

### **LP22 Parking Requirements, Including Electric Vehicles**

Q.286 Have the parking requirements set out in LP22 been prepared consistent with national policy as set out in the NPPF, are they justified and would they be effective?

Q.287 Given the requirements of the Building Regulations, do the requirements for electric vehicle infrastructure in part 3 of LP22 serve a clear purpose, and avoid unnecessary duplication of policies that apply to a particular area?

### **Matter 18: Climate change**

**Issue: Is the approach to dealing with climate change in the Plan justified and consistent with national policy and would it be effective?**

### **LPS10 Climate Change, Sustainable Design and Construction**

Q.288 Would Policy LPS10 be effective in applying to all development proposals as set out in criterion 1?

Q.289 Are the requirements set out in criterion 2 justified and consistent with national policy?

Q.290 Is it clear that the reference in criterion 2.a to 'Passivhaus equivalent' is an alternative and optional route to compliance, and developers are not required to meet that standard to meet LPS10?

Q.291 Is the requirement for new development to demonstrate through an Energy and Sustainability Statement how it would incorporate the various policy requirements for climate change mitigation, adaptation and resilience justified?

Q.292 Are the requirements for BREEAM assessments and BREEAM Communities scoping assessments in criteria 4 and 5 justified, consistent with national policy and would they be effective?

### **LP23 Climate Change Adaptation and Resilience**

Q.293 Is it effective and proportionate that the requirements of LP23 for an adaptation and resilience assessment apply to all development?

Q.294 Are the general principles in part 5 of the Policy justified and given the requirements of the Building Regulations do 5 a and b serve a clear purpose, and avoid unnecessary duplication of policies that apply to a particular area?

### **LP24 Energy Management in New Development**

Q.295 Is the energy hierarchy for new development justified, and would it be effective?

Q.296 Are the specific standards for development justified, consistent with national policy, and would they be effective?

Q.297 Are the requirements for energy offsetting justified and consistent with national policy for planning conditions and obligations?

Q.298 Are the requirements in part 13 for the heating systems hierarchy justified and consistent with national policy?

Q.299 Are the requirements for cooling systems justified?

Q.300 Are the monitoring provisions justified and would they be effective?

### **LP25 Embodied Carbon**

Q.301 Is it effective and proportionate that all proposals will be expected to show how development will minimise its embodied carbon?

Q.302 Are the requirements for embodied carbon in major development justified and consistent with national policy, and would they be effective?

Q.303 Are the requirements for offsetting justified and consistent with national policy for planning conditions and obligations?

## **LP26 Renewable and Low Carbon Energy Systems**

- Q.304 Would the Policy be effective in conserving and enhancing the landscape and scenic beauty of the Cotswolds National Landscape?
- Q.305 Is the requirement in LP26 criterion 5 that re-powering proposals should have either the same or larger installed capacity consistent with national policy, justified, and would it be effective?
- Q.306 What is the justification for the areas safeguarded for wind energy development and have they been selected using an appropriate methodology?
- Q.307 Is the policy in LP26 7 d for development of non-wind energy proposals in safeguarded areas justified, and would it be effective?
- Q.308 Are the provisions relating to ground mounted solar developments on best and most versatile agricultural land justified, consistent with national policy and would they be effective?
- Q.309 Is criterion 10 a iii concerning fire risk in relation to proposals for new energy generation or storage installations/proposals justified, and would it be effective? Is criterion 10 b clearly written and unambiguous, so it is evident how a decision maker should react to development proposals given that it sets out a 'strong preference'?

## **LP27 Community Energy**

- Q.310 Is policy LP27 consistent with national policy? Are the references to benefit, legal interest and community support in the policy land use planning matters?

## **Matter 19: Natural Environment**

**Issue: Are the individual policies clear, justified and consistent with national policy and will they be effective?**

## **LPS11 Strategic Green and Blue Infrastructure**

- Q.311 The purpose of Policy LPS11 states that 'the principles in this policy can also be applied to local green infrastructure and criteria to ensure that existing and new green infrastructure is planned, delivered and managed, including the principles and requirements relating to Biodiversity Net Gain'. Is Policy LPS11 clearly written and unambiguous, so that the aim of the Green Infrastructure Framework is evident? Would it be effective?
- Q.312 Should the policy, reasoned justification (and/or the Glossary) explain the purpose and requirement of Strategic Green and Blue Infrastructure, and what these terms comprise?

- Q.313 Policy LPS11 refers to a number of considerations, such as the Cotswolds National Landscape, designated heritage assets, trees, flood risk, etc, which are covered by other relevant development plan policies. Should Policy LPS11 be modified in order to avoid unnecessary duplication of policies that apply to a particular area, and would it be effective?
- Q.314 Is paragraph 5 of Policy LPS11 relating to the Cotswold National Landscape consistent with national policy and would it be effective?
- Q.315 What is the justification for the requirements set out in Policy LPS11 to conserve/protect and enhance, and are these consistent with national policy?
- Q.316 Does paragraph 7 of Policy LPS11, which requires development proposals to provide a minimum of 10% biodiversity net gain, serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area?
- Q.317 What is the justification for paragraph 9 of Policy LPS11, which requires development proposals within 12.3km of the Severn Estuary Internationally Designated Habitats to provide an appropriate level of contributions towards SAMM and/or offsite SANGS?
- Q.318 Is paragraph 9 clearly written and unambiguous, so that it is evident how a decision maker should react to development proposals and would it be effective?
- Q.319 What is the status of the Severn Estuary Recreation Mitigation Strategy 2025?
- Q.320 For clarity, should the wording of paragraphs 9 and 16 be modified to ensure these requirements do not apply to all 'new development' including, for example, householder extensions?

## **LP28 Ecology and Biodiversity Net Gain**

- Q.321 Is Policy LP28 clearly written and unambiguous, so it is evident how a decision maker should react to development proposals, having particular regard to the mitigation hierarchy set out in paragraph 3?
- Q.322 Does paragraph 7 of Policy LP28 serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area?
- Q.323 What is the justification for the hierarchy approach set out in paragraph 7 of Policy LP28, and is it consistent with national policy?
- Q.324 Are the requirements in paragraph 8 clearly written and unambiguous, so it is evident how a decision maker should react to development proposals when

the Local Validation List is a separate development management requirement, and is not part of the development plan?

Q.325 For clarity, effectiveness and consistency with national policy, should paragraph 4 of Policy LP28 be modified to ensure development proposals are not refused where the effects would be mitigated through S106 planning obligations?

## **Matter 20: Creating well designed places**

**Issue: Are the individual policies clear, justified and consistent with national policy and will they be effective?**

### **LPS12 Creating Well-Designed Places**

Q.326 Is Policy LPS12 consistent with national policy, having particular regard to the requirements to achieve the highest possible standards of design and site planning, and protect and enhance the natural environment?

Q.327 Having particular regard to the number of criteria which development proposals would be expected to accord with, is Policy LPS12 positively prepared and would it be effective in helping to achieve high quality, sustainable homes?

Q.328 Paragraph 2 of Policy LPS12 requires proposals to be consistent with the Council's published design guides, design codes, adopted masterplans and spatial frameworks. Given that these are not part of the development plan, is it evident how a decision maker should react to development proposals?

Q.329 What is the justification for requiring all types of major development to engage the services of a design review panel and an independent Building for a Healthy Life assessment for strategic sites, and would this be effective?

Q.330 What is the justification for requiring an integrated public art scheme to be developed and delivered for all types of major development as set out in paragraph 19 of Policy LPS12, and is this consistent with national policy?

### **LP29 Stewardship Arrangements**

Q.331 Is the sequential approach set out in Policy LP29 clearly written and unambiguous, so it is evident how a decision maker should react to development proposals, and will the sequential approach be effective? What would happen if Resident Management Companies cannot be agreed? Will Policy LP29 be effective in such circumstances?

As detailed in the reasoned justification to Policy LP29, a Public Charter and Supplementary Planning Document (SPD) will be produced that will set out expected

standards and management options / models and the context / scenarios where they would be the most appropriate as well as model clauses for articles of association and s106 agreements.

Q.332 Given the provisions of the Levelling-up and Regeneration Act 2023 (Commencement No.11 and Saving and Transitional Provisions) Regulations 2026 concerning the preparation of SPD, would the policy be effective in this regard?

Q.333 Given that the SPD would not form part of the submitted plan, is the Plan clearly written and unambiguous, so that it is evident how a decision maker should react to development proposals in this regard?

### **LP30 Private and Communal Amenity Space Standards**

Q.334 What is the evidence that there is an identified need for new dwellings to accord with private and communal amenity space standards? Are the proposed standards justified?

Q.335 Is Policy LP30 sufficiently flexible and will it be effective in helping to achieve high quality, sustainable homes?

Q.336 What is the evidence that the Council has considered the impact of the policy, in terms of Local Plan viability and any effects on the affordability of new homes?

### **Matter 21: Minerals**

**Issue: Is the approach of the Plan to minerals working and restoration consistent with national policy, justified, and would it be effective?**

#### **LPS13 Mineral working and Restoration**

Q.337 Would a landbank of at least 10 years for crushed rock be maintained throughout the plan period?

Q.338 What is the justification for the proposed extraction of crushed rock through the preferred areas set out in LPS13?

Q.339 Which sites make up the land bank and what is the anticipated annual production from them in the plan period?

Q.340 Is paragraph 4 of the reasoned justification based on the latest Local Aggregate Assessment?

Q.341 Is it effective to set out the development principles for the preferred areas in the reasoned justification and not in Policy LPS13? Is the approach to development principles set out in this policy consistent with that for the other allocations set out in Appendix 1 of the Plan?

Q.342 What is the evidence that the proposed development at Cromhall Quarry is not be likely to have an adverse effect on the Slickstones Quarry, Cromhall SSSI?

Q.343 Would the Plan (or the development plan as a whole) be effective in safeguard existing, planned and potential sites for the bulk transport, handling and processing of minerals?

Q.344 What is the evidence that so far as practicable, the Council has taken into account the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials, whilst aiming to source minerals supplies indigenously?

Q.345 Would the Plan provide for a steady and adequate supply of industrial minerals such as brick making clay as referred to in paragraph 2 of the reasoned justification on page 354 of the Plan? If not, why not?

## **Matter 22: Nationally Significant Infrastructure Projects, and nuclear power**

**Issue: Is the approach of the Plan to Nationally Significant Infrastructure Projects, and nuclear power proposals consistent with national policy, justified, and would it be effective?**

### **LPS14 Nationally Significant Infrastructure Projects (NSIPs)**

Q.346 Parts of the Policy LPS14 appear to be largely concerned with procedural rather than land use planning matters (such as part 3), or contributions and local economic and community benefits (such as parts 8 and 9). Does the Policy serve a clear purpose, is it clearly written and unambiguous, so it is evident how a decision maker should react to development proposals, and would it be effective?

### **LPS15 Nuclear New Build**

Q.347 What is the justification for a Community Impact Mitigation Fund in part 2 b of the Policy and is that consistent with national policy?

Q.348 What is the justification for the maximisation of positive outcomes, community benefits, and legacy as set out in part 3 c? Is this consistent with national policy?

### **LP31 Oldbury A Station: Decommissioning**

Q.349 What is the justification for the maximisation of benefits, and positive legacy for communities as set out in part 5? Is this consistent with national policy?

## **LP32 Radioactive Waste**

Q.350 What is the justification for part 1 I of Policy LP32 in seeking to secure 'appropriate community benefits', and is this consistent with national policy?

## **Matter 23: Waste**

**Issue: Is the approach of the Plan to waste consistent with national policy, the development plan, is it justified, and would it be effective?**

## **LP33 Waste**

Policy LP33 is a new non-strategic policy for waste.

Q.351 Policy LP33 does not supersede any policies of the Joint Waste Core Strategy as per Regulation 8(5). Is LP33 consistent with the policies of the Joint Waste Core Strategy as per regulation 8(4)? If not, why not, and should it supersede any policies of the Joint Waste Core Strategy?

Q.352 National planning policy for waste, amongst other things states that in preparing Local Plans, waste planning authorities should:

- in particular, identify the tonnages and percentages of municipal, and commercial and industrial, waste requiring different types of management in their area over the period of the plan;
- consider the need for additional waste management capacity of more than local significance and reflect any requirement for waste management facilities identified nationally;
- take into account any need for waste management, including for disposal of the residues from treated wastes, arising in more than one waste planning authority area but where only a limited number of facilities would be required;
- consider the extent to which the capacity of existing operational facilities would satisfy any identified need.

Policy LP33 does not address the above points. What is the purpose of LP33, is it consistent with national policy and would it be effective? Does LP33 serve a clear purpose, avoiding unnecessary duplication or deviance from the policies of the Joint Waste Core Strategy?

## **Matter 24: Monitoring**

**Issue: Would the proposed monitoring arrangements contained in Appendix 3 be effective?**

Q.353 Would the proposed monitoring arrangements contained in Appendix 3 be effective to meet the monitoring requirements of the Plan and its specific Policies?

## **Matter 25: Allocations – Sites in Appendix 1 not subject to site specific policies**

**Issue: Are the proposed allocations justified, effective and consistent with national policy?**

Policy LPS2 sets out in criterion 2 that site allocations for new homes and employment land, where the principle of development is acceptable as part of the Locational Strategy, are set out on the Policies Map, and available to view in Appendix 1: Allocation sites. Amongst other things Appendix 1 sets out 'development considerations' and 'site/design context' for a number of sites. Appendix 1 states that development considerations are not necessarily a complete list of mitigations, and all relevant policies in the Local Plan, including 'saved' policies, should be applied where relevant.

Q.354 The Plan does not include specific site allocation policies for a number of the proposed site allocations which are set out in Appendix 1; Allocation sites. Whilst Policies LPS2 (2) and LPS3 (6) refer to the site allocations, and site allocations are shown on the Policies Map, in the absence of specific site allocation policies, or the site allocations in Appendix 1 being set out in policy, is the Plan effective? What is the intended status of Appendix 1?

Q.355 Policy LPS2 15 b requires development of site allocations to meet all local plan policy requirements including individual site development principles. Given that the 'development considerations' as set out in Appendix 1 are not strategic or non-strategic policies, do they serve a clear purpose, and would the Plan be effective in this regard?

## **Matter 26: Sites in Appendix 1 – within North and East Fringe Urban Areas and within Market Towns**

**Issue: Whether the individual allocations in Appendix 1 are justified, effective and consistent with national policy?**

Note: allocations included in Appendix 1 but covered by separate policies are dealt with under the relevant site specific policy (as indicated in the lists below in italics).

## **Within North and East Fringe Urban Areas**

Q.356 Is there any evidence to suggest that any of the proposed allocations within the North and East Fringe Urban Areas listed below should not be allocated?

*NF3 Land at University of the West of England Frenchay Campus covered by LP12*

### **EF1 Lyde Green Road (60)**

Q.357 Why is the proposed modification to introduce additional text relating to local character necessary for soundness?

### **EF2 Lucas Works Moravian (100 + employment)**

Q.358 Are the development considerations for the site justified and effective, particularly given that they require land uses to be developed in accordance with the principles set out in the Yate Town Improvement Plan, which does not form part of the development plan?

Q.359 What is meant by 'only the positive and robust architectural features should be referenced in the new development'?

### **EF3 Lyde Green Farm (393)**

Q.360 What is the justification for the delivery of the proposed allocation as set out in Appendix 5 – Housing Trajectory? Has the Plan been positively prepared in this regard?

### **EF5 The Former Grange School Warmley (161)**

Q.361 Is the proposed allocation consistent with national policy, with reference to the criteria set out in paragraph 103 of the NPPF relating to open space and playing fields?

### **EF6 46 Broad Street Staple Hill (14 + commercial ground floor)**

Q.362 What is meant by positive and natural features?

### **NF1 Land Northeast of Old Gloucester Road Hambrook (30)**

Q.363 What is meant by positive built and natural features?

### **NF2 Land at Filton 20 Business Park Golf Course Lane (276)**

Q.364 Are the development considerations for the site justified and effective?

Q.365 Why is the proposed modification relating to development considerations necessary for soundness?

**NF5 Filton Retail Park Fox Den Road Stoke Gifford**

No specific questions.

**NF6 Land at Westfield Lane Stoke Gifford (60)**

No specific questions.

**NF7 Aviva Centre Stoke Gifford (400 / mixed use)**

Q.366 What is the evidence that any significant impacts from the proposed development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree?

Q.367 The development considerations indicate that opportunities for high-quality taller buildings at higher densities to define surrounding open spaces and to optimise uses within this highly accessible area would be supported. What is the justification for this and is it consistent with Policy LP1?

**NF8 Land at Hambrook Lane Harry Stoke (70)**

Q.368 Would the proposed allocation be consistent with national policy and guidance in respect of development and flood risk?

Q.369 Why is the proposed modification relating to development considerations necessary for soundness?

Q.370 What is the justification for the site capacity?

**NF9 Harry Stoke Road Harry Stoke (50)**

Q.371 Why are the proposed modifications relating to development considerations necessary for soundness?

Q.372 Should the development considerations be modified to make reference to the provision of a Multi-Use Games Area?

**Within Market Towns**

Q.373 Is there any evidence to suggest the sites within Market Towns should not be allocated?

**TH1 Land behind former Thornbury Health Centre Prowse Close Thornbury (75 extra care)**

Q.374 Is the provision of extra care accommodation via the proposed allocation justified and effective?

Q.375 Would the proposed allocation be effective in addressing the presence of the principal aquifer within the site?

**TH2 Former Castle School Gloucester Road Thornbury (100)**

Q.376 Is the proposed allocation justified in light of the potential constraints, infrastructure requirements and adverse impacts?

Q.377 Is the proposed allocation justified and consistent with national policy with reference to the criteria set out in paragraph 103 of the NPPF relating to open space and playing fields?

Q.378 Is the proposed allocation consistent with national policy and guidance in respect of development and flood risk?

Q.379 Is the proposed modification relating to flood risk necessary and would it be effective?

Q.380 Would the proposed allocation be effective in addressing the presence of the principal aquifer within the site?

Q.381 Has the proposed allocation had regard to the 'made' Thornbury Neighbourhood Plan?

Q.382 Are the development considerations for the site justified and effective?

**YA1 Yate Town Centre (200)**

Q.383 Is the addition of a requirement that the allocation ensures access is retained along the main river and that a Flood Risk Activity Permit is required for works within 8 metres of the main river necessary for soundness?

**YA2 Land at Ladden Garden Village Yate (140)**

Q.384 Would the proposed allocation be consistent with national policy and guidance in respect of development and flood risk?

Q.385 Why is the proposed modification relating to flood risk necessary for soundness?

**YA3 Land north of Ladden Garden Village Yate (162)**

Q.386 Is the proposed allocation justified in light of the potential infrastructure requirements and any potential adverse impacts on the transport network (in terms of capacity and congestion), or on highway safety?

**YA5 Former Whirlpool site Station Road Yate (150 mixed use)**

No specific questions.

**YA6 Cranleigh Court Yate (10)**

No specific questions.

**Matter 27: Sites in Appendix 1 – North and East Fringe Urban Area**

**Issue: Whether the individual allocations in Appendix 1 are justified, effective and consistent with national policy?**

**North and East Fringe Urban Edge**

Note: allocations included in Appendix 1 but covered by separate policies are dealt with under the relevant site specific policy (as indicated in the lists below in italics).

*BV3 Rockhouse Farm Cattybrook Road Shortwood covered in LP7*

*BV6 Land south of Shortwood Hill covered by LP7*

*BV9 Carsons Green east of the A4174 covered by LP7*

*BV10 Mounts Court Farm covered by LP8*

*BV13 Land north of A420 and south of Goose Green covered by LP8*

*BV12 Land north of Lyde Green covered by LP6*

*FC3 Woodlands Golf Course covered by LP5*

*PSB1 Land south of the B4055 Easter Compton covered by LP4*

*PSB2 Land between Over Lane and the B4055 Easter Compton covered by LP4*

*PSB3 Land off Blackhouse Hill Easter Compton covered by LP4*

*PSB4 Land to the east of the B4055 Pilning Station covered by LP14*

*SV1 Land south of Gloucester Road Almondsbury covered by LP10*

*SV5 Land on the south side of Gaunts Earthcott Lane covered by LP5*

*SV7 Land off Gaunts Earthcott Lane Woodlands covered by LP5*

*SV13 Land to the south of Trench Lane Winterbourne covered by LP5*

Q.387 Is there any evidence to suggest that any of the proposed allocations within the North and East Fringe Urban Edge listed below should not be allocated?

**BOC1 Land to the rear of Park Farm Barry Road Oldland Common (304)**

Q.388 What are the exceptional circumstances for altering the Green Belt boundary?

Q.389 What is the justification for the proposed boundaries of the site, and would they be effective?

Q.390 Is the proposed allocation justified in light of the potential constraints, infrastructure requirements and potential adverse impacts?

Q.391 What is the evidence that the proposed allocation addresses the presence of the overhead cable route within the site, and would it be effective in this regard? Is the proposed modification justified in this regard?

Q.392 Are the development considerations for the site justified and effective?

### **BOC2 Land at 12 The Park Willsbridge (150)**

Q.393 What are the exceptional circumstances for altering the Green Belt boundary?

Q.394 What is the justification for the proposed boundaries of the site, and would they be effective?

Q.395 Are the development considerations for the site justified and effective?

### **BOC3 Jarretts Garden Centre Bath Road (95)**

Q.396 What are the exceptional circumstances for altering the Green Belt boundary?

Q.397 What is the justification for the proposed boundaries of the site, and would they be effective?

Q.398 Are the development considerations for the site justified and effective?

Q.399 Is the proposed allocation justified having regard to any constraints and the provision of necessary infrastructure?

### **BOC4 Jarretts Yard Oldland Common (140)**

Q.400 What are the exceptional circumstances for altering the Green Belt boundary?

Q.401 Is the proposed allocation justified in light of the potential constraints, infrastructure requirements and adverse impacts?

Q.402 What is the justification for the proposed boundaries of the site, and would they be effective?

Q.403 What is the evidence that the proposed allocation addresses potential flood risk, and how would it be mitigated?

### **BOC5 Willsbridge Nursery off Keysham Road (A41745) (62 + employment)**

Q.404 What are the exceptional circumstances for altering the Green Belt boundary?

Q.405 What is the justification for the proposed boundaries of the site, and would they be effective?

Q.406 Is the proposed allocation justified having regard to any constraints and the provision of necessary infrastructure?

Q.407 What is the evidence that the proposed allocation addresses contamination risk within the site given the proximity to a historic landfill and a previous pollution incident to the west, and would it be effective in this regard?

**BOC6 Land adjacent to Bitton Sports and Social Club (33)**

Q.408 What are the exceptional circumstances for altering the Green Belt boundary?

Q.409 What is the justification for the proposed boundaries of the site, and would they be effective?

Q.410 Are the development considerations, which require development to preserve and enhance the significance of identified heritage assets, consistent with national policy?

Q.411 Are the development considerations, which require the usage of sports playing pitches in the southern portion of the site, consistent with national policy?

**BOC7 Land adjoining Bath Road Bridgegate (59)**

Q.412 What are the exceptional circumstances for altering the Green Belt boundary?

Q.413 What is the justification for the proposed boundaries of the site, and would they be effective?

Q.414 Would the proposed allocation be consistent with national policy and guidance in respect of development and flood risk?

Q.415 Is the proposed modification relating to flood risk necessary and effective?

**BOC8 Land on the east side of Bath Road North Common Warmley (64)**

Q.416 What are the exceptional circumstances for altering the Green Belt boundary?

Q.417 What is the justification for the proposed boundaries of the site, and would they be effective?

Q.418 Is the proposed allocation justified having regard to any constraints and the provision of necessary infrastructure?

Q.419 Are the development considerations, which require development to preserve and enhance the significance of identified heritage assets, consistent with national policy?

**BV14 Land on the east side of Bath Road North Common Warmley (41)**

Q.420 What are the exceptional circumstances for altering the Green Belt boundary?

Q.421 What is the justification for the proposed boundaries of the site, and would they be effective?

Q.422 Is the proposed allocation justified having regard to any constraints and the provision of necessary infrastructure?

Q.423 Would the proposed allocation be consistent with national policy and guidance in respect of development and flood risk?

Q.424 Is the proposed modification relating to flood risk necessary and effective?

Q.425 Is the addition of requirements to ensure access is retained along the main river and to obtain a Flood Risk Activity Permit for works within 8 metres of the main river necessary for soundness?

**BV15 Homeapple Close (employment)**

Q.426 What are the exceptional circumstances for altering the Green Belt boundary?

Q.427 What is the justification for the proposed boundaries of the site, and would they be effective?

**BV16 Glenfern and land to the east of Carsons Road (employment)**

Q.428 What are the exceptional circumstances for altering the Green Belt boundary?

Q.429 What is the justification for the proposed boundaries of the site, and would they be effective?

**EG1 Land at Shortwood Mangotsfield (65)**

Q.430 What are the exceptional circumstances for altering the Green Belt boundary?

Q.431 What is the justification for the proposed boundaries of the site, and would they be effective?

**EG2 Land at Cossham Street Mangotsfield (150)**

Q.432 What are the exceptional circumstances for altering the Green Belt boundary?

Q.433 What is the justification for the proposed boundaries of the site, and would they be effective?

Q.434 Are the development considerations, which require development to preserve and enhance the significance of identified heritage assets, consistent with national policy?

Q.435 Is the proposed allocation justified having regard to any constraints and the provision of necessary infrastructure?

### **EG3 The Hayfields off Cossham Street (65)**

Q.436 What are the exceptional circumstances for altering the Green Belt boundary?

Q.437 What is the justification for the proposed boundaries of the site, and would they be effective?

Q.438 Are the development considerations, which require development to ensure the usage of sports playing pitches is 'retained or replaced on site in quantity and quality', clear and consistent with national policy?

Q.439 Is the proposed allocation justified having regard to any constraints and the provision of necessary infrastructure?

### **EG4 Promphrey Hill Mangotsfield (7)**

Q.440 What are the exceptional circumstances for altering the Green Belt boundary?

Q.441 What is the justification for the proposed boundaries of the site, and would they be effective?

### **FD1 The Oaks Filton Road Hambrook (150)**

Q.442 What are the exceptional circumstances for altering the Green Belt boundary?

Q.443 What is the justification for the proposed boundaries of the site, and would they be effective?

Q.444 Is the site capacity clear and justified?

### **FD2 Bolbrek Filton Road Filton (11)**

Q.445 What are the exceptional circumstances for altering the Green Belt boundary?

Q.446 What is the justification for the proposed boundaries of the site, and would they be effective?

### **HA1 Land at Castle Farm Road Hanham (125)**

Q.447 What are the exceptional circumstances for altering the Green Belt boundary?

Q.448 What is the justification for the proposed boundaries of the site, and would they be effective?

Q.449 Is the proposed allocation consistent with national policy and justified, having particular regard to the loss of best and most versatile agricultural land?

Q.450 What is the evidence that any significant impacts from the proposed development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree?

### **HA2 Land at Castle Inn Farm Hanham (60)**

Q.451 Is the proposed allocation justified having regard to any constraints and the provision of necessary infrastructure?

Q.452 What are the exceptional circumstances for altering the Green Belt boundary?

Q.453 What is the justification for the proposed boundaries of the site, and would they be effective?

Q.454 Is the proposed allocation consistent with national policy and justified, having particular regard to the loss of best and most versatile agricultural land?

Q.455 What is the evidence that any significant impacts from the proposed development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree?

Q.456 Why is the proposed modification relating to woodland buffer zone necessary for soundness?

### **NC1 West of Carsons Road (employment)**

Q.457 What are the exceptional circumstances for altering the Green Belt boundary?

Q.458 What is the justification for the proposed boundaries of the site, and would they be effective?

### **PW1 15 and 17a London Road Warmley (30)**

Q.459 What are the exceptional circumstances for altering the Green Belt boundary?

Q.460 What is the justification for the proposed boundaries of the site, and would they be effective?

**SV3 Land at Hortham Lane Hortham (30)**

Q.461 What are the exceptional circumstances for altering the Green Belt boundary?

Q.462 What is the justification for the proposed boundaries of the site, and would they be effective?

Q.463 What is the evidence that any significant impacts from the proposed development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree?

**SV9 Land off Tockington Lane Almondsbury (10)**

Q.464 What are the exceptional circumstances for altering the Green Belt boundary?

Q.465 What is the justification for the proposed boundaries of the site, and would they be effective?

**SV10 The Quarters Colony Farm Hortham (90)**

Q.466 What are the exceptional circumstances for altering the Green Belt boundary?

Q.467 What is the justification for the proposed boundaries of the site, and would they be effective?

Q.468 Are the development considerations, which require onsite sports and leisure uses to be retained or replaced in kind and quality, consistent with national policy?

**SV14 Recreation Ground Oaklands Drive Almondsbury (employment)**

Q.469 What are the exceptional circumstances for altering the Green Belt boundary?

Q.470 What is the justification for the proposed boundaries of the site, and would they be effective?

Q.471 Why is the proposed modification referring to use classes B2 and B8 necessary for soundness?

Q.472 Is the provision of additional employment land via the proposed allocation justified and effective?

## **WI8 Land at Hambrook Business Park The Stream Hambrook (10)**

Q.473 Having regard to the comments made by the landowners stating that the site is no longer available, is the proposed allocation effective, and is it justified?

## **Matter 28 Sites in Appendix 1 – Edge of Market Town and Rural Village**

**Issue: Whether the individual allocations in Appendix 1 are justified, effective and consistent with national policy?**

Note: allocations included in Appendix 1 but covered by separate policies are dealt with under the relevant site specific policy (as indicated in the lists below in italics). This includes all the sites at Charfield.

### **Charfield**

*CH1 Land north of Wotton Road Charfield covered in LP9*

*CH2 Land to the south of Charfield covered in LP9*

### **Edge of Market Towns**

Q.474 Is there any evidence to suggest that any of the proposed allocations at the Edge of Market Towns listed below should not be allocated?

## **CS3 Barnhill Quarry (300)**

Q.475 Would the proposed allocation be effective in addressing the presence of the principal aquifer within the site?

Q.476 What is the evidence that the Barnhill Quarry SSSI would be protected and enhanced in accordance with paragraph 180 of the NPPF?

Q.477 What is the justification for the proposed boundaries of the site, and would they be effective?

## **FC1 Land on the East side of Dyers Lane (150)**

Q.478 Is the proposed allocation justified having regard to any constraints and the provision of necessary infrastructure?

Q.479 Are the development considerations for the site justified and effective?

## **THO2 Land to the West of Park Farm (15)**

No specific questions.

### **THO3 land West of B4601 Thornbury (40)**

Q.480 What are the exceptional circumstances for altering the Green Belt boundary?

Q.481 Is the proposed allocation justified in light of other homes having been permitted nearby?

Q.482 What is the evidence that the proposed allocation addresses the presence of the overhead cable route within the site, and would it be effective in this regard?

Q.483 Are the development considerations for the site justified and effective?

Q.484 Why is the proposed modification relating to heritage assets necessary for soundness?

### **Rural Villages**

Q.485 Is there any evidence to suggest the sites within the Rural Villages should not be allocated?

### **BV1 Land at Wick Quarry (25)**

Q.486 What are the exceptional circumstances for altering the Green Belt boundary?

Q.487 In respect of the Cotswolds National Landscape, what is the evidence that the proposed development would be sensitively located and designed to avoid or minimise adverse impacts on the designated area?

Q.488 Why is the proposed modification relating to landscape in the development considerations and the requirement for a Visual Impact Assessment necessary for soundness?

### **BV2 Land to the rear of London Road Wick (5)**

Q.489 What are the exceptional circumstances for altering the Green Belt boundary?

### **BV4 Land north of London Road Wick (30)**

Q.490 What are the exceptional circumstances for altering the Green Belt boundary?

Q.491 In respect of the Cotswolds National Landscape, what is the evidence that the proposed development would be sensitively located and designed to avoid or minimise adverse impacts on the designated area?

### **BV7 CEMEX Floors London Road (45)**

Q.492 What are the exceptional circumstances for altering the Green Belt boundary?

Q.493 In respect of the Cotswolds National Landscape, what is the evidence that the proposed development would be sensitively located and designed to avoid or minimise adverse impacts on the designated area?

Q.494 Why is the proposed modification relating to landscape in the development considerations and the requirement for a Visual Impact Assessment necessary for soundness?

### **BV8 Land to the rear of 91 High Street Wick (10)**

Q.495 What are the exceptional circumstances for altering the Green Belt boundary?

Q.496 In respect of the Cotswolds National Landscape, what is the evidence that the proposed development would be sensitively located and designed to avoid or minimise adverse impacts on the designated area?

Q.497 Why is the proposed modification relating to landscape and the requirement for a Visual Impact Assessment in the development considerations necessary for soundness?

### **BV11 Land east of Abson Road Pucklechurch (60)**

Q.498 What are the exceptional circumstances for altering the Green Belt boundary?

Q.499 Is the proposed allocation justified having regard to any constraints and the provision of necessary infrastructure?

### **CH3 Woodend Farm Woodend Lane Cromhall (employment)**

No specific questions.

### **CH4 Land at Longcross Farm Cromhall (30)**

Q.500 Is the proposed allocation justified having regard to any constraints and the provision of necessary infrastructure?

Q.501 What is the evidence that any significant impacts from the proposed development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree?

### **CS1 Land between France Lane and Park Street Hawkesbury Upton (20)**

Q.502 Is the indicated number of homes for the site justified?

Q.503 In respect of the Cotswolds National Landscape, what is the evidence that the proposed development would be sensitively located and designed to avoid or minimise adverse impacts on the designated area?

Q.504 Are the development considerations for the site justified and effective?

Q.505 Is the site in the Green Belt? If it is not, is the development considerations heading for 'Landscape and Green Belt' correct?

**CS2 Land south of Luckington Road Acton Turville (50)**

Q.506 Is the scale of the proposed allocation justified in relation to the size of Acton Turville and having regard to any other constraints?

Q.507 Is the indicated number of homes for the site justified?

**CS4 Buffer Depot Acton Turville (employment)**

Q.508 What is the justification for the proposed boundaries of the site, and would they be effective?

Q.509 Is the size of the site and the scale of development proposed justified?

Q.510 In respect of the Cotswolds National Landscape, what is the evidence that the proposed development would be sensitively located and designed to avoid or minimise adverse impacts on the designated area?

**CS5 Land at Rushmoor Dairy Badminton (employment)**

Q.511 Is the site in the Green Belt? If it is not, is the development considerations heading for 'Landscape and Green Belt' correct?

**FC2 Land off Park Plan Coalpit Heath (95)**

Q.512 Is the proposed allocation justified having regard to any constraints and the provision of necessary infrastructure?

**FC4 Land off Engine Common Lane Yate (130)**

Q.513 Is the proposed allocation justified having regard to any constraints and the provision of necessary infrastructure?

Q.514 Would the proposed allocation be consistent with national policy and guidance in respect of development and flood risk?

Q.515 Are the development considerations for the site justified and effective?

**FC5 Land at Holly Hill Farm Iron Acton (20)**

Q.516 What are the exceptional circumstances for altering the Green Belt boundary?

Q.517 What is the justification for the proposed boundaries of the site, and would they be effective?

Q.518 Are the development considerations for the site justified and effective?

Q.519 Why is the proposed modification relating to the landscape and Green Belt development considerations necessary for soundness?

**FC6 Land off Bristol Road Frampton Cotterell (60)**

Q.520 What are the exceptional circumstances for altering the Green Belt boundary?

**FC7 Land at 404 Norh Road Yate (30)**

Q.521 Are the development considerations for the site justified and effective?

**FC8 Land at North Road Yate (20)**

No specific questions.

**FC9 Land to the rear of 450 North Road Yate (8)**

No specific questions.

**FC10 Land off North Road Yate (20)**

Q.522 What are the exceptional circumstances for altering the Green Belt boundary?

Q.523 Are the development considerations for the site justified and effective?

Q.524 Why is the proposed modification relating to the development considerations necessary for soundness?

**FC11 Field to south of Rock View Engine Common Lane (12)**

No specific questions.

**FC13 Tytherington Quarry Tytherington Road (hotel and leisure)**

Q.525 Would it be justified and effective for the site to be included in Policy LPS7 Table 2 (Safeguarded Employment Areas)?

Q.526 What is the justification for the proposed boundaries of the site, and would they be effective?

Q.527 Why is the proposed modification relating to the development considerations with regard to the adjacent quarry necessary for soundness?

**FC14 Former Watermore Junior School (20)**

Q.528 Is the proposed allocation justified in light of the potential constraints and adverse impacts, including in relation to heritage assets?

Q.529 Are the development considerations for the site justified and effective?

**FC15 Land at Berrows Mead Rangeworthy (19)**

Q.530 Is the proposed allocation justified in light of the potential constraints and adverse impacts, including in relation to flood risk and biodiversity?

Q.531 Is the site in the Green Belt? If it is not, are the development considerations which refer to the Green Belt correct?

**SV2 Land at Vattingstone Lane Alveston (130)**

Q.532 What are the exceptional circumstances for altering the Green Belt boundary?

Q.533 What is the justification for the proposed boundaries of the site, and would they be effective?

Q.534 Are the development considerations for the site justified and effective?

**SV6 Land north of A38 Alveston (40)**

Q.535 What are the exceptional circumstances for altering the Green Belt boundary?

Q.536 What is the justification for the proposed boundaries of the site, and would they be effective?

**SV12 Land to the north of Berkeley Vale Motors Alveston (20)**

Q.537 What are the exceptional circumstances for altering the Green Belt boundary?

**SV15 Land by Aust Road and Elbertson Road Olveston (20)**

Q.538 What are the exceptional circumstances for altering the Green Belt boundary?

Q.539 What is the evidence that any significant impacts from the proposed development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree?

Q.540 Are the development considerations for the site justified and effective?

Q.541 Would the proposed allocation be effective in addressing the presence of the principal aquifer within the site?

Q.542 What is the evidence that the proposed allocation addresses contamination within the site and proximity to a landfill site, and would it be effective in this regard?

### **THO1 Land off Alveston Hill Thornbury (60)**

Q.543 What are the exceptional circumstances for altering the Green Belt boundary?

Q.544 What is the justification for the proposed boundaries of the site, and would they be effective?

Q.545 Are the development considerations for the site justified and effective?

Q.546 Why are the proposed modifications relating to the development considerations with regard to active travel routes and heritage assets necessary for soundness?

### **WI1 Land to the north of the railway line Winterbourne (70)**

Q.547 What are the exceptional circumstances for altering the Green Belt boundary?

Q.548 What is the justification for the proposed allocation and what account has been taken of landscape character?

Q.549 Are the development considerations for the site justified and effective?

Q.550 Why is the proposed modification relating to the development considerations with regard to design necessary for soundness?

### **WI2 Land at York Gardens Winterbourne (20)**

Q.551 What are the exceptional circumstances for altering the Green Belt boundary?

Q.552 What is the evidence that any significant impacts from the proposed development on the transport network (in terms of capacity and congestion),

or on highway safety, can be cost effectively mitigated to an acceptable degree?

Q.553 Is the indicated number of homes for the site justified?

Q.554 What is the evidence that the proposed allocation considers the proximity of the adjacent community buildings, and would it be effective in this regard?

Q.555 Are the development considerations for the site justified and effective?

Q.556 Are the considerations relating to the natural environment applicable to this site?

**WI3 Land west of Winterbourne Hill (100)**

Q.557 What are the exceptional circumstances for altering the Green Belt boundary?

Q.558 What is the justification for the proposed allocation and what account has been taken of landscape character?

*S Edwards      P Lewis      E Worthington*

INSPECTORS